



# **Main Modifications to the New Southwark Plan Integrated Impact Assessment**

**(July, 2021)**

CONSULTATION	TIMETABLE
Let's talk about your high streets	Informal consultation took place between October 2013 and February 2014
New Southwark Plan Options (Draft Policies and Area Visions) (2014)	Consultation took place between 31 October 2014 and 6 March 2015.
New Southwark Plan Preferred Option Part 1: Policies (including IIA for all DM policies)	Consultation took place between October 2015 and February 2016
New Southwark Plan Preferred Option Part 2: Site Allocations and Area Visions (including IIA for all area visions)	<p>Informal consultation took place throughout 2016 where draft visions for each area that were consulted on previously were placed on the council's website and comments invited on areas and vision content. In November 2016 the council circulated a reminder email to the policy consultation list inviting any further representations in preparation for the drafting of the visions and site allocations. Officers attended key stakeholder groups in visions areas to discuss the content of visions.</p> <p>Formal consultation initially took place on this document 6 February 2017 to 28 April 2017 however was extended to &amp; July 2017.</p>
New Southwark Plan: New and Amended Preferred Option Policies Consultation	21 June to 13 September 2017.
New Southwark Plan Proposed Submission Version <b>(including an IIA appraisal to assess the updated visions, sites and policies)</b>	Informally consulted on from 25 October 2017 for 12 weeks. Formal consultation took place from 1 December 2017 to 27 February 2018.
Consideration of responses and developing the New Southwark Plan submission version alongside all relevant documents.	February to December 2018.
New Southwark Plan Proposed Submission Version: Amended Policies 2019 <b>(including an IIA appraisal to assess the updated visions, sites and policies)</b>	Informally consulted on from 15 January 2019 for 12 weeks. Formal consultation took place from 23 January 2019 to 17 May 2019.
Submission version <b>(including an IIA appraisal to assess the updated visions, sites and policies)</b>	Submitted to the Secretary of State on 16 January 2020.
Proposed changes to the Submitted New Southwark Plan <b>(including this IIA appraisal to assess the updated visions, sites and policies)</b>	Consulted on August – October 2020
Public examination	February – April 2021
Main Modifications to the New Southwark Plan	To be consulted on in Summer 2021
Submission of the draft Old Kent Road Area Action Plan Integrated Impact Assessment Report to the Planning Inspectorate	Winter 2021
New Southwark Plan	To be adopted winter 2021

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- Appendix 3: Baseline data – Facts and Figures
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### Appendices with detailed appraisals:

- Appendix 5: Assessment of the Area Visions and Site Allocations
- Appendix 6: Assessment of the Strategic and Development Management Policies
- Appendix 7: Assessment of the Implementation Policies

### Appendices of indicators, monitoring and option testing:

- Appendix 8: Monitoring indicators against sustainability objectives
- Appendix 9: Baseline Indicators Table
- Appendix 10: Options Testing
- Appendix 11: Scoping Report
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- Appendix 13: Policy Evolution

## Glossary

AAP	Area Action Plan
AMR	Authority Monitoring Report
BLE	Bakerloo Line Extension
CAZ	Central Activities Zone
EqIA	Equalities Impact Assessment
GLA	Greater London Authority
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
IIA	Integrated Impact Assessment
LDS	Local Development Scheme
MWIA	Mental Well-being Impact Assessment
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NSP	New Southwark Plan
NSPIIASR	New Southwark Plan, Integrated Impact Assessment: Scoping Report
NSP PSV	New Southwark Plan Proposed Submission Version
NSPPO	New Southwark Plan, Preferred Option
NSP AVs&SAs	New Southwark Plan Area Visions and Site Allocations
NSP SV	New Southwark Plan, Submission Version
OA	Opportunity Area
OAPF	Opportunity Area Planning Framework
PSV	Proposed submission version
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SCI	Statement of Community Involvement
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
SRC	Social Regeneration Charter
SUDS	Sustainable Urban Drainage Systems
TFL	Transport for London

## 1. Non technical summary

### What is this document?

- 1.1 This document reports on the Integrated Impact Assessment (IIA) of the Main Modification to the New Southwark Plan. The IIA fulfils the requirement for a Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Analysis (EQIA) and Health Impact Assessment (HIA). This integrated approach avoids the need to undertake and report on separate assessments, seeks to reduce any duplication of assessment work and benefits from a shared understanding of the policies. It also illustrates the council's approach to promoting sustainable growth in the borough with equality, diversity and the health of residents at the heart of everything we do.
- 1.2 Main Modifications incorporate changes to the New Southwark Plan since the Proposed Submission Version 2017 and also incorporating Amended Policies 2019. The council then made minor changes at Submission stage and at Council's Proposed Changes version August 2020 which was consulted on August to October 2020, which allowed us to gain feedback on changes to the plan which were recommended by the Inspectors.
- 1.3 The public hearings took place virtually from 23 February – 25 March 2020 and 19 April – 30 April 2020. These can be viewed on the Council's YouTube page. Following these hearings, the Council has proposed a number of modifications to the Plan which have been agreed by the Inspectors.
- 1.4 The full list of Main Modifications is set out for this consultation. These modifications also include the addition or amendments of policies and site allocations as discussed during the Hearing Sessions. Other minor changes can be found in EIP27D Schedule of Changes and the schedule of Additional Modifications.
- 1.5 The council asked the Inspectors under section 20(7C) of the 2004 Planning and Compulsory Purchase Act as amended) to recommend 'main modifications' (changes that materially affect the policies) to make a submitted local plan sound and legally compliant. The local planning authority can also put forward 'additional modifications' of its own to deal with more minor matters. The NPPG advises whether to advertise any 'additional modifications' is at the discretion of the local planning authority, but they may wish to do so at the same time as consulting on the main modifications. The council's Additional Modifications are available at the same time as the Main Modifications.
- 1.6 The Council has previously prepared a number of IIA's to accompany different versions of the Plan. These include:
  - New Southwark Plan Preferred Option (October 2015)
  - New Southwark Plan Proposed Submission Version (2017)
  - New Southwark Plan Proposed Submission Version: Amended Policies Version (2019)
  - NSP Submission Version (2020)
  - NSP Council's Proposed Changes to the Submitted Plan (2020)
- 1.7 Each IIA was updated to reflect the amendments and modifications to the Plan as the Plan progressed.
- 1.8 This version of the IIA has been updated to reflect the Main Modifications and amendments that have been made to the Plan since the Hearing Sessions. Appendix 6 has been updated to reflect the modifications to the policies. A policy evolution has also been included for P69 Energy.

- 1.9 Appendix 5 includes a site appraisal for each site allocation. This has been updated to take in to account the addition of sites such as Aylesbury Action Area Core as well as to reflect any changes to site capacities as set out in the Site Allocations Methodology Report (May 2021).
- 1.10 The borough is at risk of flooding from a number of sources including from the River Thames as well as from ground and surface water flooding. Within the sustainability appraisals set out in Appendix 5, Objective 14 details how the sequential test (and exception test if required) has been applied with further analysis for each site allocation as required by paragraph 157 of the Framework.
- 1.11 The 2020 IIA was updated to more clearly set out the Council's considerations of reasonable alternatives for planning for growth on each site allocation and this is set out in **Appendix 12**. Amendments have been made to this to reflect the changes in the Site Allocations Methodology Paper (May 2021). All site allocation capacities considered during different iterations are also set out within this appendix. The final indicative site capacity assumptions are set out in Appendix 12, and are also provided within the Sites Allocations Methodology Report (May 2021). This IIA also goes into further detail on the chosen Option B and sets out why this is the best way forward for the Plan.
- 1.12 **Appendix 12a** sets out reasonable alternatives with a spatial dimension considered as part of the Sustainability Appraisal.
- 1.13 This IIA provides the final version of all policies, area visions and site allocations for the Main Modifications to the New Southwark Plan version, responding to all previous consultation feedback.
- 1.14 As part of the IIA, the final submission policies, site allocations and area visions are assessed against seventeen sustainability, health and equalities objectives, initially established by the New Southwark Plan, Integrated Impact Assessment: Scoping Report (NSPIIASR found in Appendix 11: Scoping Report), published and consulted upon in February 2015. The seventeen objectives are subsequently referred to in this report as IIA Objectives, numbered from one to seventeen, and answer the combined sustainability, health and equalities questions set out in **Appendix 4: Sustainability Appraisal Framework**.
- 1.15 The methodology for selecting these IIA Objectives, appraising Main Modifications to the New Southwark Plan version policies, area visions and site allocations and future monitoring of the adoption of the NSP are established in the subsequent section of the report. Each of the IIA Objectives is monitored by a number of Baseline Indicators, which are established in **Appendix 3: Baseline data – Facts and Figures**. This uses existing data monitored by the council, to regularly indicate sustainability outcomes from the implementation of the NSP. The Baseline Indicators to continuously monitor the adoption of the NSP are presented in table format in **Appendix 9: Baseline Indicators Table**.
- 1.16 The role of this document is to explain the process that the council has undertaken to establish these IIA Objectives, which are legally compliant with European, national and regional legislation. Secondly, to appraise the Main Modifications to the New Southwark Plan policies, area visions and site allocation using these IIA Objectives and Baseline Indicators, which can be found in **Appendix 5: Assessment of the Area Visions and Site Allocations**, **Appendix 6: Assessment of the Strategic and Development Management Policies** and **Appendix 7: Assessment of the Implementation Policies**. Thirdly, this document indicates how the council proposes to continue to monitor the consequences of implementing the Main Modifications to the New Southwark Plan (Option B: Place-shaping and Plan-making selected as the most sustainable option over Option A: Business-as-usual in the NSPIIASR and Option C: Higher option) in Appendix 9: Baseline Indicators Table. As such, it presents a

case that the draft Local Plan is legally compliant with all relevant legislation, plans and programmes, as established in Appendix 2: Relevant Plans, Programmes and Strategies.

## 2 Introduction

### **What does this document do?**

- 2.1 The IIA identifies the impacts of the NSP policies, area visions and site allocations on sustainability objectives, health of the population and equality groups. The process has consisted of the collection of baseline information on the environmental, social and economic characteristics of the borough (scoping). This collection of information has been used to identify sustainability issues, objectives and indicators in order to assess the likely impacts of the policies in the Main Modifications to the New Southwark Plan and to enable monitoring of progress in the future.
- 2.2 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.
- 2.3 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).

### **What has been taken from the previous IIA?**

- 2.4 Having undertaken a detailed IIA through previous draft Local Plan consultations, it is considered that the six strategic policies (or topic areas) were positively represented through the seventeen IIAOs, and will continue to reflect this in the future monitoring of Baseline Indicators (Appendix 4). Key positive impacts are identified in terms of social, economic and environmental sustainability in the summary of appraisals provided in this report. Some risks have been identified but these are generally mitigated by other policies in the plan. Appendix 6 also includes an assessment of the strategic policies –SP1a and SP1b.

### **Structure of this Document**

- 2.5 This document will firstly outline the policy requirements for the IIA in the following chapter, with more detailed information provided in Appendix 1 and Appendix 2. Secondly, it will provide a background into the IIA and the NSP, summarizing how the IIA developed through earlier consultations and how these have informed the Main Modifications to the New Southwark Plan. Thirdly, it will provide a brief overview to the approach taken to collecting baseline data and subsequently forming baseline indicators that will be used to monitor the future impacts of adopting the NSP. The entirety of baseline data, including baseline indicators and contextual characteristics are included in Appendix 3.
- 2.6 The fourth chapter provides detailed overview into the IIA appraisal methodology, describing the conjunction of baseline indicators and IIAOs, used to appraise the NSP policies, area visions and site allocations. The formation of the IIAOs, to inform sustainability, health and equalities targets are provided in Appendix 4. This appendix describes how the IIAOs were

selected based on the requirements of regulation described in Chapter 2, to justify legal compliance of the proposed Local Plan to meeting sustainability, health and equality targets. It also indicates the targets of the Council's baseline indicators which are continuously being monitored across different teams at the Council, and how these baseline indicators align with the objectives, to support the negative and/or positive impacts of future adoption of the draft Local Plan.

- 2.7 The fifth chapter identifies the process of identifying options within Appendix 10, for the Main Modifications to the New Southwark Plan, summarizing the NSP Scoping Report that was submitted and consulted upon in 2015. This is included in full in Appendix 11 and justifies why the selection of Option B: Place-shaping and Plan-making is identified as more supportive to the health, sustainability and equality objectives than Option A: Business-as-usual, which includes keeping the adopted Southwark Plan (2007) and Core Strategy (2011) or by selecting Option C: Higher option. Further information on the Council's considerations of reasonable alternatives for planning for growth and the site allocation capacities which informed the final indicative site capacity assumptions are set out within Appendix 12. Appendix 12a sets out reasonable alternatives with a spatial dimension considered as part of the Sustainability Appraisal.
- 2.8 The sixth chapter sets out how the seventeen objectives were developed that formed the basis of the IIA appraisal methodology and assessment; and further details on how the IIA appraisal was carried out.
- 2.9 The seventh Chapter summarizes the full Sustainability Appraisal of the NSP policies, found in detail in Appendix 6, and identifies any mitigation or negative impacts that could arise based on the objectives as a result of adopting policies from the draft Local Plan. This chapter is a summary and overview as to whether the policies are positively prepared to support the sustainability, health and equality objectives of the regulatory bodies in adopting the draft Local Plan.
- 2.10 Chapter eight summarizes the appraisals from Appendix 5 of the sustainability of the Area Visions and Site Allocations. Chapter eight further summarizes the approach to the sequential test (and exception test if required).
- 2.11 Chapter nine summarizes the appraisals from Appendix 7 of the sustainability of the Implementation Policies.
- 2.12 Finally, the tenth chapter sets out how the impacts of the Main Modifications to the New Southwark Plan on sustainability, health and equality will be monitored, based on continued feedback from the Baseline Indicators. This is included in further detail in Appendix 8 and Appendix 9.

### **3 Regulatory requirements for the IIA**

#### **Why is this document required?**

- 3.1 Under the Planning and Compulsory Purchase Act 2004 regulations, a Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA), prepared in accordance with the Strategic Environmental Assessment Directive EC/2001/42 is required for all Development Plan Documents.
- 3.2 Paragraph 32 of the NPPF (2019) states:
- “Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)”.
- 3.3 Southwark Council has a statutory duty to consider the equality impacts of its decisions. The public sector Equalities Duty (section 149 of the Equality Act 2010) came into force on the 5<sup>th</sup> April 2011 which extended the previous duties to cover the following protected characteristics:
- “Age, disability, gender reassignment, pregnancy and maternity, race – including ethnic or national origins, colour or nationality, religion or belief – including lack of belief, sex and sexual orientation”.
- 3.4 While there is no statutory requirement to undertake a Health Impact Assessment (HIA), the government has clearly expressed a commitment to promoting HIA’s at a policy level in a variety of policy documents and they are increasingly being seen as best practice.

#### **The move towards Integrated Impact Assessment**

- 3.5 The council is also required by UK law to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics, as set out in the Public Sector Equalities Duty (2011) (under section 149 of the Equalities Act 2010). The council carries out Equalities Analysis (EqIA) of its plans, decisions and programmes to consider the potential impact (positive and negative) of proposals on the key ‘protected characteristics’ in the Equality Act 2010 and on Human Rights.
- 3.6 The Equality Act was introduced in October 2010. It replaces and extends all previous equality legislation into one overarching act. The Equality Act 2010 outlines a number of ‘protected characteristics’, which are the groups of people or communities where the government feels that discrimination or unfair treatment could arise.
- 3.7 An Equalities Impact Assessment (EQIA) has been conducted in addition to the equalities considerations made in the Integrated Impact Assessment (IIA) to form the equality analysis. The EQIA has also been updated to reflect the modifications in the Plan.
- 3.8 The equalities impact of the Main Modifications to the New Southwark Plan has been assessed at every stage of the plan. The document assesses the Plan against the protected characteristics highlighting where there is a positive impact, negative impact or neutral impact. Each strategic policy, development management policy, implementation policy and area vision has been assessed for its equalities impact. A summary is also provided of the

key equalities issues and positive and negative impacts of the Strategic and Implementation Policies. It also sets out the mitigation where appropriate.

- 3.9 The IIA sets out the baseline data and indicators that have informed the assessment of the equalities impacts of the policies in the Main Modifications to the New Southwark Plan. The EQIA pulls out further data more specifically related to the protected characteristics and socio-economic disadvantage. Appendix 1 - Supporting Datasets of the EQIA has also highlighted where the data is unavailable for more specific datasets.
- 3.10 The outcome of this assessment of equalities sits alongside the HRA, HIA, and SA to create a comprehensive sustainability assessment.
- 3.11 The IIA considers if there are any unintended consequences for people within the equalities and health groups and if the policies will be fully effective for all target groups. Crucially, assessing policies from these different perspectives - that is 1) a sustainability perspective (including environmental, social and economic sustainability), 2) an equalities perspective and 3) a health perspective - enables a considered and holistic approach to assessing the policies in the Main Modifications to the New Southwark Plan in an integrated way.
- 3.12 There are overlaps in the methods and outputs of the above documents and therefore an approach which fuses the statutory requirements of the SA, SEA, EqIA and HIA into a single integrated impact assessment is used to assess the impact of the Main Modifications of the New Southwark Plan in an integrated way.

### **Strategic Environmental Assessment Directive**

- 3.13 SAs are also required to satisfy the European Directive 2001/42/EC. The Directive requires a formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. SEA is transposed into UK legislation through the Environment Assessment of Plans and Programmes Regulations 2004. SEA is focused primarily on environmental effects, whereas SA goes further by examining all the sustainability related effects of plans, whether they are social, environmental or economic. The process for undertaking SA is conducted in accordance with the requirements of the SEA Directive. Appendix 1 explains what the SEA directive is and signposts where the relevant information can be found within the document.

### **Habitats Regulations Assessment**

- 3.14 The Conservation of Habitats and Species Regulations (as amended) (2010) [the Habitats Regulations] require that Habitats Regulation Assessment (HRA) is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance.
- 3.15 The objective of the HRA screening process is to determine whether likely significant effects on designated Natura 2000 sites, either alone or in combination may result from the implementation of Main Modifications to the New Southwark Plan. 'Likely significant effect' in this context is any effect that may reasonably be predicted as a consequence of the plans that may affect the conservation objectives of the features for which a site was designated.
- 3.16 The information collated in the baseline information and from consultation on the scoping report has been mapped, reviewed and assessed against the draft policies and strategies of the Main Modifications to the New Southwark Plan to determine whether there is potential for the integrity of these sites to be affected. Site integrity is defined as:

*“the coherence of its structure and function across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified”*

- 3.17 The HRA of the Main Modifications to the New Southwark Plan has been undertaken alongside the IIA, with the findings of the HRA informing the IIA. The methods and findings of the HRA process are reported separately from the IIA and the report has been approved by the statutory consultee (Natural England) and placed online to be accessed by the wider public.
- 3.18 The HRA screening process has found that the policies and site allocations to be adopted under the Main Modifications to the New Southwark Plan will have no negative impact on the four European Sites that are located within a 10km boundary of Southwark, either alone or when considered in combination with other existing plans and projects. In light of this finding, it is not required to carry out any further HRA analysis.

### **Health Impact Assessment**

- 3.19 Health Impact Assessment (HIA) is a combination of procedures, methods and tools by which a policy, program or project may be judged as to its potential effects on the health of a population, and the distribution of these effects within the population. In this context health can be defined as both physical and mental health and well-being. HIA also considers the potential effects on the determinants of health such as life circumstances and lifestyles. HIA is still a relatively new concept and as yet, there is no one standard method for conducting HIAs. However it should involve all relevant stakeholders and use a range of methods to gather data as evidence. While HIA is not required by law it is considered good practice, particularly since responsibility in managing the health of populations was transferred from national government to local authorities following the Health and Social Care Act 2012.
- 3.20 A Health and Wellbeing Impact Assessment (HIA) has been collated to identify the impacts of planning issues on health in the borough. This is centred round the assessment of the plan using four key themes:
- Housing design and affordability;
  - Accessibility and active travel;
  - Healthy environment; and
  - Vibrant neighbourhoods.
- 3.21 These findings are reflected in a separate report and used to inform the IIA. This report is a desktop based assessment of the health impacts of the NSP. The HIA uses the HUDU Model to identify health impacts of the policies in the Main Modifications to the New Southwark Plan. The HUDU Planning Contributions Model is a comprehensive tool to assess the health service requirements and cost impacts of new residential developments. The public health team at Southwark was also given the opportunity to comment and give guidance.
- 3.22 The key identified health impacts on the Main Modifications to the New Southwark Plan are surrounding mental health and wellbeing in regards to creating a strong sense of place, and easily navigable and legible pedestrian routes and public realm. This is especially important for the elderly, and for those with neurological conditions or disabilities as it allows for independent living and improves safety and security for all. There are also issues surrounding the prevalence of hot food takeaways and obesity, which Strategic Policy 5 Healthy, active lifestyles aims to address.
- 3.23 The transport policies and low line routes policies ensure greater safety and accessibility to active travel and improve the pedestrian experience to encourage more active lifestyles for all. In terms of air quality and pollution, there are also issues around the impact of poor air

quality on life expectancy, health and quality of life. These are all issues the Plan aims to mitigate.

- 3.24 The Health and Well-being Impact Assessment is integrated into the IIA. The IIA in its assessment of the policies and their impact has taken into consideration the potential health impacts of the plan. The sustainability objectives also make due regard to the potential health impacts arising from the implementation of policies in the NSP. The baseline data and indicators in the IIA provide a context for need in the borough and have informed the assessment of policies in the HIA.
- 3.25 The EQIA has also assessed the health impacts of the policies of the main Modifications to the New Southwark Plan against the protected characteristics and socio-economic disadvantage. It has indicated what the potential positive, negative or neutral impacts will be on health, and provided a mitigation method where there is a negative impact.

## 4 Background to the Integrated Impact Assessment (IIA) to inform the New Southwark Plan (NSP)

### Purpose of the Integrated Impact Assessment

- 4.1 The purpose of Sustainability Appraisal (SA) is to ensure that sustainable development has been integrated in the formulation of development plans and to verify that due consideration has been given to social, economic and environmental factors. The SA must also show how the requirements of the Strategic Environmental Assessment (SEA) Directive have been met. The National Planning Practice Guidance (NPPG) states that SEA can be undertaken as an integral part of the SA. The Integrated Impact Assessment (IIA) considers the sustainability impacts of the plan in addition to impacts on health and equalities.

### Planning and Sustainable Development

- 4.2 The National Planning Policy Framework (NPPF) (2019) provides the over-arching national policy to deliver sustainable development through the planning process. The framework suggests that the purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system having three overarching objectives:
- *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
  - *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
  - *an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*
- 4.3 The National Planning Policy Framework states that:  
*“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains).”- NPPF, para 32*
- 4.4 The NPPG sets out the key stages and tasks for the SA process and their relationship with the Local Plan process, which are illustrated in Figure 3.1. These key stages and tasks are applicable to the IIA process for the New Southwark Plan PSV, NSP Amended Policies 2019 and the Proposed changes to the Submitted New Southwark Plan. It is important to note that IIA is an iterative and on-going process. Stages and tasks in the IIA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.

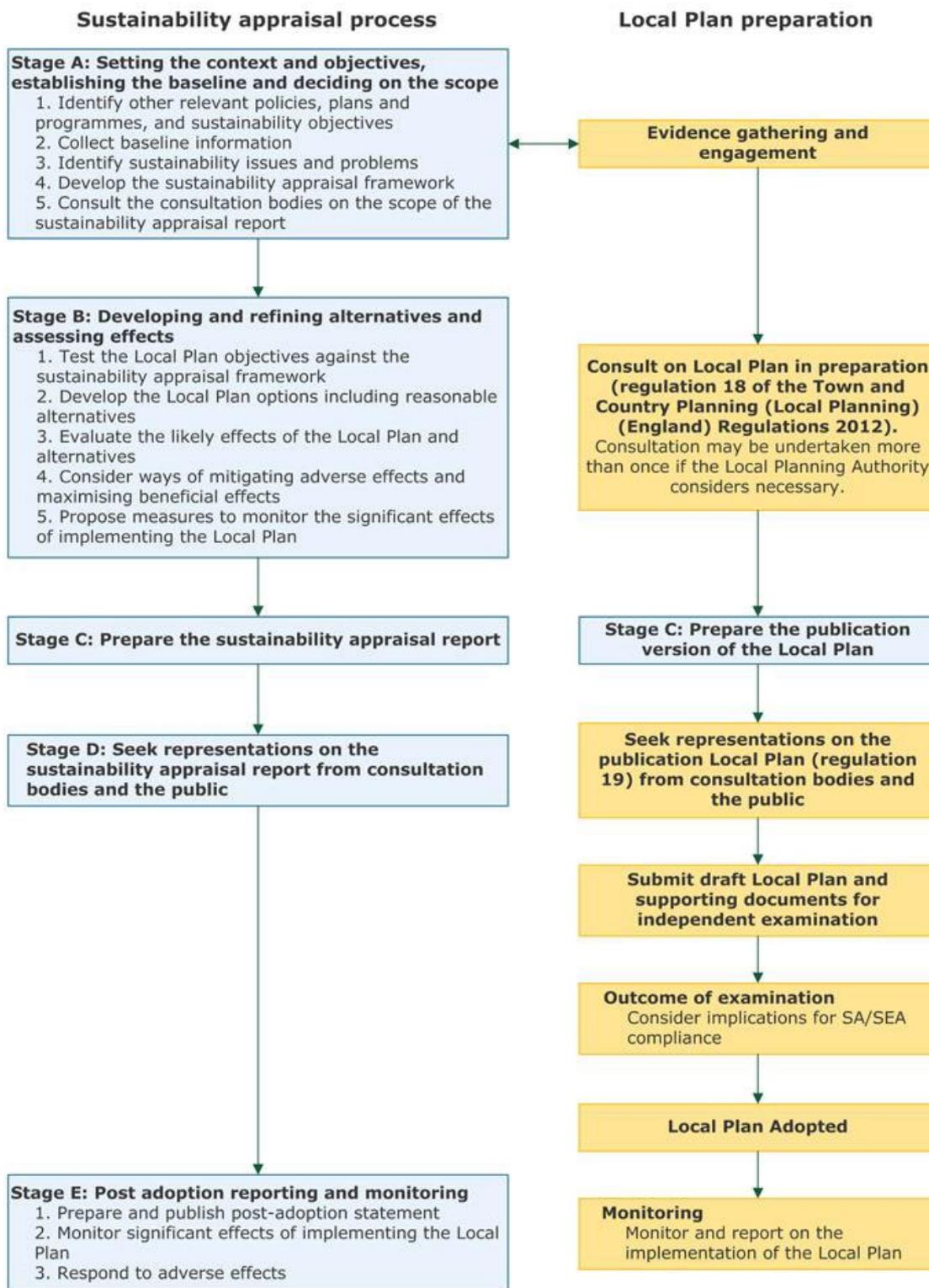


Figure 3.1 Stages of the Sustainability Appraisal Process <sup>1</sup>

<sup>1</sup> Local plan-making, National Planning Practice Guidance 2014

<b>Stage A – Scoping</b>	<p>Setting the context and objectives, establishing the baseline and deciding on the scope.</p> <p>Consultation on the NSP scoping report took place in February and March 2015.</p>
<b>Stage B – Testing alternatives</b>	<p>Developing and refining options and assessing effects against the IIA framework.</p> <p>Options were considered during the preparation of the NSP in 2016.</p>
<b>Stage C – Prepare the Integrated Impact Assessment Report</b>	<p>This stage involves testing in detail the impacts of the preferred options. Following this, the updated IIA report has been prepared for consultation with the public along with the consultation on the NSP proposed submission version.</p>
<b>Stage D – Seek representations from consultation bodies and the public</b>	<p>Consultation on the preferred option IIAs took place across later 2015 and early 2016 and 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 Proposed changes to the Submitted New Southwark Plan was assessed in this the 2020 appraisal which will be was consulted on in autumn 2020. The Main Modifications to the New Southwark Plan have been assessed in this version of the IIA which will be consulted on in Summer 2021.</p>
<b>Stage E – Post adoption reporting and monitoring</b>	<p>The plan will be monitored through the Baseline Indicators, Authority’s Monitoring Report and the Social Regeneration Indicators. Further information on this is set out in Chapter ten of this report. A Monitoring Framework has been produced alongside the NSP to ensure the monitoring and effectiveness of each of the policies. The NSP will be continuously influenced by other tiers of planning at national, regional, borough and local levels. Any changes to other spheres of planning legislation will require the IIA and NSP to be updated accordingly to align with these new targets set.</p>

Figure 3.2 Sustainability Appraisal Stages Timetable

### Stages of Preparation for the New Southwark Plan

4.5 The New Southwark Plan has been prepared in several stages. At the preferred option stage the council split the plan, and stages of consultation in two parts: Firstly, the policies set out the strategic and development management policies which proposals will be assessed against and expected to comply with following adoption of the New Southwark Plan.

- 4.6 Part 2: Site Allocations and Area Visions provides an indication of the council's expectations for planned growth across the borough and to shape the development of the borough's distinct areas by setting out area-based and site-based planning policies. These have been brought together in the proposed submission version and remain as such in the current Proposed changes to the Submitted New Southwark Plan. To date the council has undertaken the following stages of consultation to inform the formulation of draft Local Plan policies.
- 4.7 The first stage of consultation, 'Let's talk about your high streets' was a very informal initial stage of consultation to get people thinking about their high streets and what they want from them. This consultation helped shape area visions and planning policies for the New Southwark Plan Options Document.
- 4.8 The New Southwark Plan Options version included draft visions for Aylesbury, Bankside, Bermondsey and the Blue, Blackfriars Road, Camberwell, Canada Water, Dulwich, Elephant and Castle, Herne Hill, London Bridge, Old Kent Road, Nunhead, Peckham and Tower Bridge Road. The Options version also set out initial proposed site allocations and policies and an implementation plan for seven main planning and regeneration topics.
- 4.9 The New Southwark Plan Preferred Option Part 1 (Policies) took into account representations received in response to the Options consultation in order to develop the preferred option for development management policies and regeneration strategy for Southwark.
- 4.10 The New Southwark Plan Preferred Option Part 2 (Sites Allocations and Area Visions) develops the site allocations and visions taking into account consultation on the Options and Preferred Options Part 1 versions. Informal consultation took place to ensure stakeholders could participate in the development of the visions and site allocations before they were formally drafted.
- 4.11 Between 21 June and 13 September 2017 the council consulted on a selected set of new and amended policies for both the New Southwark Plan and Old Kent Road Area Action Plan with the NSP going to cabinet again for the Preferred Submission Version in October 2017. Consultation responses received, as with previous stages and consultation periods, were carefully considered and informed the proposed submission version of the plan.
- 4.12 The Council then carried out the Proposed Submission 2017 consultation to provide interested stakeholders with an opportunity to comment on the revised policies, visions and site allocation. However, responses were only accepted at this stage that related to two things: 1) Does the plan comply with the relevant planning legislation and regulations? And 2) Is the plan 'sound'? That is:
- Has it been positively prepared
  - Are the policy requirements robustly justified with sound reasoning and evidence-led
  - Will the plan be effective in what it is supposed to achieve; and
  - Is it in conformity with regional and national tiers of policy?
- 4.13 Following a review of the consultation responses received to the proposed submission version, amendments to some of the policies were made as required.
- 4.14 The Amended Policies 2019 were consulted on between 15 January 2019 and 17 May 2019. This has informed the Proposed Changes to the submitted Plan 2020, submitted for Examination in Public, to be tested to make sure it is both legal and sound.

- 4.15 The Council's Proposed Changes to the Submitted New Southwark Plan was further consulted on in autumn 2020, while the Examination in Public remained open. This was completed at the request of the Planning Inspectors to take into account the minor changes made by the council to the Proposed Submission and Submission version of the Plan.
- 4.16 Our Statement of Community Involvement (SCI) sets out how individuals, community groups, developers and anyone else who may have an interest in local plans should be consulted on planning documents. This ensures that our consultation is therefore with our community groups. The SCI is currently being updated with a draft due to go out to consultation imminently.

### **The New Southwark Plan, Integrated Impact Assessment: Scoping Report**

- 4.17 The New Southwark Plan, Integrated Impact Assessment: Scoping Report (NSPIASR) was published in February 2015. The NSPIASR (Appendix 11) considered relevant baseline information (Appendix 3) regarding key environmental, social and economic matters within the borough which are likely to be impacted by NSP policies. The NSPIASR also established the framework for undertaking the IIA by setting out sustainability, health and equalities objectives, decision making criteria and indicators used to measure the impacts of the emerging policies. These were updated as part of consultation responses, where the finalised seventeen IIA Objectives can be found in Appendix 4. The way which these objectives will be monitored on an ongoing basis is identified in Appendix 8 through selected baseline indicators.

### **Consultation Responses on the IIA**

- 4.18 The first stage of formal consultation for the NSP IIA involved the IIA Scoping Report, which was published for consultation in February and March 2015. SEA regulations require that the contents of the scoping report must be consulted on with the following 'authorities with environmental responsibility':
- Natural England
  - Environment Agency
  - Historic England
  - Sport England
- 4.19 The law requires the statutory organisations be provided with five weeks in which to respond to the Scoping Report. Consultation responses from all respondents to the consultation have been used to update the relevant elements of this IIA report and to inform the preparation of the Main Modifications to the New Southwark Plan.
- 4.20 Consultation responses on the Scoping Report included suggestions for some minor amendments to be incorporated and also suggestions were put forward for: additional baseline information to be included in the appendices; recommendations for amending some of the objectives; recommendations for new sustainability questions and suggestions for amending and creating new indicators.
- 4.21 As we move forward we will continue to assess the sustainability implications across the wider area. We will also consult the same groups and organisations on the sustainability report at this stage.
- 4.22 Government guidance also recommends that additional bodies can be consulted in order to represent the social and economic aspects of sustainability. An extensive list of local consultees on our planning policy consultation database was consulted.

### **Social Regeneration Indicators (Fairer Future Promises)**

- 4.23 Southwark Council has prepared a set of social regeneration indicators which will monitor social regeneration impacts in the borough. The social regeneration indicators will sit alongside the Council Plan to monitor the high-level impact that our actions are having across the borough and the progress we are making in achieving our regeneration for all ambitions.
- 4.24 The council adopted an initial Southwark Regeneration Framework in September 2017. A revised Regeneration that Works for All Framework was adopted in January 2019. The Framework identifies 10 Social Regeneration Charter Areas in the borough. A Social Regeneration Charter must be prepared for each area which will set out the vision, the specific opportunities, challenges and our priorities for the area, using the Social Regeneration Indicators as a means of monitoring. The Charters will also inform the local Community Infrastructure Levy priorities for the area.
- 4.25 Social Regeneration Charters have been adopted for Canada Water (December 2018), St Thomas Street (December 2019), and the Old Kent Road (January 2020). A draft Charter for Borough & Bankside is awaiting adoption at the time of writing. Charters are currently being prepared for Bermondsey & The Blue, Camberwell, Peckham and Nunhead, and Walworth subject to public consultation.
- 4.26 The outcomes measured through the Social Regeneration Indicators inform the IAOs and Baseline Indicators described in Appendix 4 and Appendix 8. They will be used across the council and by partners to inform council activities, plan strategically for the future and influence others.

### **Identifying Other Relevant Plans, Strategies and Programmes**

- 4.27 To establish a clear and concise scope for the IIA it is necessary to identify and review the relevant policies, plans and programmes that may influence the content of the Main Modifications to the New Southwark Plan. The process of an IIA appraisal enables potential relationships to be identified that will allow any synergies to be exploited and any inconsistencies and/or constraints to be addressed. Additional objectives and indicators which would assist in analysing and comparing economic, environmental and social impacts are also identified.
- 4.28 The policy framework is constantly evolving: at a national level, the NPPF and NPPG are now in place; at a regional level, the London Plan has been adopted and associated SPG's are subject to on-going review.
- 4.29 At a local level, planning decisions in Southwark are influenced by a number of statutory plan-making authorities and policy is developed with regard to corporate Council-wide strategies. In addition the evidence base continues to evolve as the NSP and associated framework documents are prepared.
- 4.30 Appendix 2 provides an overview of the key international, national, regional and local policies, plans and programmes that inform the NSP and the accompanying IIA.

### **Southwark's Local Plan**

- 4.31 The "Local Plan" refers to all relevant documents that are prepared by a local planning authority in planning for the future and in assessing and making decisions on planning applications. There are several layers and sub-sets to a Local Plan. Points 1-7 together, below, make up Southwark's current Local Plan:

- 4.32 The National Planning Policy Framework (NPPF) was updated in 2019. To aid understanding and interpretation of the NPPF, the government also produced topic-based National Planning Practice Guidance (NPPG). However, the guidance does not constitute formal policy and so does not hold significant weight in the determination of planning applications. The NPPF seeks to establish planning policies applicable to the UK as a whole. Unless otherwise justifiable, all regional and local planning policy must be in general conformity with the NPPF.
- 4.33 The London Plan was adopted in March 2021 and contains the regional planning policy for Greater London as a whole. The London Plan considers long-term, large scale, strategic issues as well as more detailed policy suited specifically to London, for example prescribing acceptable levels of density in a London context. The Mayor of London also produces more detailed Supplementary Planning Guidance (SPG) to aid understanding and interpretation of the planning policies in the London Plan. Unless otherwise justifiable, all London borough local planning policy must be in general conformity with the London Plan.
- 4.34 The 'saved' Southwark Plan policies (adopted in 2007) contain detailed development management policies which are used in assessing planning applications.
- 4.35 The Core Strategy (adopted in 2011) is the overarching spatial plan for the borough. This was produced in response to a new system of local plans introduced by national government. The Core Strategy takes a longer-term, more broad and strategic overview than the 2007 Southwark Plan.
- 4.36 Area Action Plans (AAP's) have been adopted for Aylesbury, Peckham and Nunhead and Canada Water. At the time of writing an additional AAP was being prepared for the Old Kent Road. These documents contain area-specific planning policy fine-tuned for specific areas.
- 4.37 Other area and topic based Supplementary Planning Documents (SPD's) - These do not constitute planning policy and their purpose is to aid understanding and provide a more detailed interpretation of and guidance to local Southwark planning policies.
- 4.38 Neighbourhood Plans – Southwark has several Neighbourhood Forums either established or currently in the process of being established with the objective of designating a Neighbourhood Area. Designated Neighbourhood Forums are able to prepare a Neighbourhood Plan which must be in general conformity with the local, regional and national planning policy. A Neighbourhood Plan has been adopted for the Southback and Waterloo area. Lambeth is the lead authority and adopted the plan on 16 December 2019.
- 4.39 The Local Development Scheme (LDS) sets out the timetable for the preparation and adoption of Southwark's various planning policy documents (such as those listed above). This schedule takes into account the different stages of plan preparation including evidence base preparation, background studies, and various consultation phases and where relevant any public hearings that the Council will need to satisfy before adopting policies. This is updated annually.

### **The New Southwark Plan**

- 4.40 Once adopted, the New Southwark Plan (NSP) will replace the 'saved' policies of the Southwark Plan (2007) and the Core Strategy (2011), incorporating the strategic and detailed policies into one document. The current AAPs will also be rescinded. The planning policies as proposed in the NSP will have significant implications for the social, economic and environmental well-being and resilience of the borough and its residents.
- 4.41 The NSP explains the council's strategy for regeneration from 2019-2036. The NSP:
- Sets policies to support the provision of new homes including 11,000 new Council homes

- Protects our existing schools and community facilities in the borough and provide more where this is needed
- Protects local businesses and attracts more businesses into the borough to increase job opportunities
- Supports our high streets and increases the range of shops to increase their vitality
- Directs growth to certain areas of the borough, predominantly in the Old Kent Road, Elephant and Castle, Canada Water, East Walworth, Blackfriars Road, Bankside and along the River Thames where there is greater public transport accessibility
- Introduces policies to improve places by enhancing local distinctiveness and protecting our heritage assets
- Sets policies to provide more green infrastructure and to promote opportunities for healthy activities

4.42 The NSP is a spatial plan. Not only does it set out planning policies to guide development but it also explains how development will be delivered and may inform future decisions about investment in infrastructure to provide a Fairer Future for all residents, as identified in the council's Fairer Future Promises<sup>2</sup>.

### **What are Area Visions and Site Allocations?**

4.43 Area visions: Southwark's neighbourhoods each have a rich, varied and unique character. The New Southwark Plan contains a vision for each area setting out what the neighbourhood will be like in the future, and how new development will help achieve this. The visions set out the existing individual character of the borough's neighbourhoods and how the New Southwark Plan will help to build on this character as sites come forward for development. They will set out how development will seek to protect, enhance and incorporate heritage assets in new development and will identify key opportunities for new development including improvements in public realm, walking and cycling routes, health and education facilities and green links.

4.44 Site allocations: Site allocations comprise a detailed list of potential development sites that the council has identified for future development. Councils are required to identify and allocate development sites in their local plans to help ensure strategic needs for housing, employment, schools and health facilities and more can be met. To ensure this, the council has the opportunity to set out key land use and other requirements for each site, including indicative densities, routes through sites and any other requirements the council deem necessary.

### **Appraisal of the site allocations and area visions**

4.45 Area visions provide the strategic vision for the future of Southwark's distinct places and neighbourhoods. They set out key infrastructure enhancements, opportunities for public realm and transport improvements and growth opportunities for new homes and jobs. Area visions also identify the prevailing character of different places to be renewed, retained or

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<sup>2</sup> Fairer Future Promises link

enhanced. Development proposals should be formulated in the context of the relevant area vision and should demonstrate how they contribute towards realising the strategic vision for that area.

4.46 Site Allocations are planning policies which apply to key potential development sites of strategic importance. Site allocations are needed to ensure that when a strategic site comes forward for redevelopment it integrates well into its surroundings and contributes towards meeting strategic needs for new homes, jobs and infrastructure. Site allocations set out the land uses that must be provided as part of any redevelopment alongside other acceptable land uses that may be provided in addition to the required land uses. For example, site allocations may specify that development must provide new public open space, new public access routes, and new health or education facilities.

4.47 The full appraisal of the area visions and site allocations is provided within Appendix 5.

**How has sustainability, health and equalities been considered in the development of the Proposed changes to the Submitted New Southwark Plan?**

4.48 For the HIA element of the IIA the impacts on the population groups listed in Table 3.3 will be considered:

Children 0-16	Unemployed
Young Adults 16-25	Low Income
Adults 25-65	Homeless/Street Community
Older Adults 65+	Refugees and asylum seekers
People with alcohol and drug problems	Ethnic groups
People with long term illness	Learning difficulties
People with mental health problems	Physical disabilities
Residents	Carers
Visitors	People who experience domestic violence

Table 3.3 Population groups considered in the HIA.

4.49 The IIAO indicators give due regard to the population groups in Table 3.3. The HIA assesses the health impacts of the policies on the above population groups in more detail in a separate document.

4.50 For the EqIA element of the IIA the impacts on the protected characteristics listed below in Table 3.4 will be considered.

4.51 The Equality Act was introduced in October 2010. It replaces and extends all previous equality legislation into one overarching act. The Equality Act 2010 outlines a number of “protected characteristics”, which are the groups of people or communities where the government feels that discrimination or unfair treatment could arise. The IIA will consider if there are any unintended consequences for some groups and if the policies will be fully effective for all target groups.

<b>Age</b>	A person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18-30 year olds).
<b>Disability</b>	A person has a disability if s/he has a physical or mental impairment which has a substantial and long-

	term adverse effect on that person's ability to carry out normal day-to-day activities.
<b>Gender reassignment</b>	The process of transitioning from one gender to another.
<b>Marriage and civil partnership</b>	In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).
<b>Pregnancy and maternity</b>	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
<b>Race</b>	A group of people defined by their race, colour and nationality (including citizenship) ethnic or national origins.
<b>Religion and belief</b>	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.
<b>Sex</b>	A man or a woman.
<b>Sexual orientation</b>	Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Table 3.4 Protected Characteristics included in the Equalities Act 2010 and their definitions as set by the Equalities and Human Rights Commission<sup>3</sup>

4.52 The EQIA also assesses the impact of the policies in the Main Modifications to the New Southwark Plan on those with socio-economic disadvantage. This is aligned with Southwark Council's objectives to deliver a fairer future for all.

### **Southwark Council's approach to equality: delivering a fairer future for all (2011) <sup>4</sup>**

4.53 This report sets out the overarching equality objectives which are linked to the strategic priorities of the council. The objectives below will also be considered in the IIA and are set out below:

<sup>3</sup> Equality and Human Rights Commission, 'Equality Act' (2010)

<sup>4</sup> Fairer Future (2011)

- Improve the quality of life for Southwark's people through better access to services and creating sustainable mixed communities with opportunities for local people that come from being in the heart of London.
- Improve social cohesion by promoting positive relationships and a sense of community and belonging, by reducing fear and tensions, and encouraging civic responsibility so that the contributions individuals and groups make to their communities are properly valued.
- Promote people's rights and responsibilities. We will do this by ensuring that the council does all it should in providing leadership and by encouraging its partners to do likewise. We will act to protect the rights of those who live in Southwark by ensuring that abuse; mistreatment or discrimination is identified and dealt with.
- Ensuring we have a workforce that understands and is committed to achieving these goals and retains the confidence of our local communities.

## 5 Baseline Data: Summary of Findings

### Links to other policies, plans and programmes

- 5.1 In order to establish a clear and concise scope for the IIA it is necessary to identify and review the relevant policies, plans and programmes that may influence the content of the NSP. This process enables potential relationships to be identified that will allow synergies to be exploited and any inconsistencies and constraints to be addressed. It will also identify additional objectives and indicators, which will assist in analysing and comparing economic, environmental and social impacts throughout the IIA and help in identifying key sustainability issues.
- 5.2 The policy framework is constantly evolving: at a national level, the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) are now in place, at a regional level, the London Plan and associated Supplementary Planning Guidance (SPG) are subject to on-going review.
- 5.3 At a local level, planning decisions in Southwark are influenced by a number of statutory plan-making authorities and policy is developed with regard to corporate Council-wide strategies. In addition the evidence base continues to evolve as NSP documents are prepared.
- 5.4 It is important to identify this policy framework at an early stage as a wide range of guidance and initiatives influence the United Kingdom's planning system and the development of planning policy in Southwark. A considerable number of relevant documents were identified at the international, national, regional and local levels as part of the Scoping Report (Appendix 11). Since the consultation on the Scoping Report, additional or more recent documents of relevance have been identified and these have been included in the table set out in Appendix 2. This provides an overview of the key international, national, regional and local policies, plans and programmes that informs the NSP and accompanying IIA.

### Baseline information

- 5.5 The aim of collecting baseline information is to assemble data on the current state of the area and the likely future state. The information then provides the basis for predicting and monitoring effects. Collecting baseline information is also a way of identifying sustainability problems and alternative ways of dealing with them.
- 5.6 Both qualitative and quantitative data has been used to inform the baseline analysis. Quantitative data has been taken from monitoring and research activities currently being carried out by a variety of organisations. Qualitative information is more often based on judgement and is particularly useful for objectives that relate to the character and quality of the built environment.
- 5.7 The baseline information collected is set out in Appendix 3.

### **Problems in collecting baseline data**

- 5.8 Problems arose because in some instances where data did exist it was often either at the wrong geographical scale e.g. regional/national or held over insufficient time to show a trend. There was also a case where some baseline data was no longer being collected. Where qualitative data has been used, it has not always been possible to provide an analysis of trends.

5.9 Monitoring is carried out more frequently for some indicators than others. In addition, some of the gaps in data still remain. In the future, if data is still not available for some indicators it may be more appropriate to select alternative indicators. However, in some cases where there are no suitable indicators relating to an objective, the objective itself may need to be revised or deleted. The baseline data has been used to describe the current social, economic and environmental characteristics. Where possible, data specific to the borough has been used.

**Key environmental, health and equality objectives**

5.10 Table 4.1 identifies key sustainability issues that have been identified for the NSP which the IIA will address. These have been abstracted from the findings of Appendix 3 which divide contextual characteristics and baseline indicators into economic, social and environmental conditions.

5.11 These have also been identified through monitoring, engagement with stakeholders, a review of relevant policies, strategies and programmes and existing council evidence base documents, and a survey of baseline data and information about the borough.

5.12 The sustainability issues are set out in the context of a number of themes, in recognition of the over-arching status and the format of the emerging NSP.

<b>Homes</b>
<ul style="list-style-type: none"> <li>• Providing everyone with a decent and affordable home to live in to meet housing needs of present and future generations</li> <li>• Providing and maintaining suitable accommodation for those with specialist needs, vulnerable individuals and families.</li> <li>• Lack of living space - overcrowding</li> <li>• Improving existing housing stock and delivering new council housing</li> <li>• Providing the right mix and balance of housing types, sizes and tenures in areas of the borough</li> <li>• Optimising the efficient use of land at appropriate densities.</li> <li>• Delivery of the London Plan housing target</li> </ul>
<b>Revitalised Neighbourhoods</b>
<ul style="list-style-type: none"> <li>• Relatively high levels of deprivation</li> <li>• Access to services and health inequalities</li> <li>• Limited access to healthy food linked to obesity and related diseases</li> <li>• Mental illness and poor self-esteem associated with unemployment and poverty</li> <li>• High levels of crime and fear of crime</li> <li>• Growing population</li> </ul>

- Poor environment leading to physical inactivity
- Improving the health of Southwark residents by promoting healthy lifestyles.
- Maintaining local distinctiveness and protecting and enhancing place-making assets.

### **Design, Heritage and Environment**

- Ensuring a high quality of design in new developments to ensure accessibility, inclusivity and interaction
- Protecting and enhancing biodiversity and access to the natural environment
- Mental health benefits from access to nature, biodiversity, green space and water
- Address existing open space deficiencies and improving the use of open spaces for sport, leisure and environment purposes
- Increasing green links and improving the public realm
- Need to preserve and enhance the historic environment and built heritage
- Protection of landscape features and designated sites
- Sensitivities around very tall buildings

### **Town Centres**

- Increasing the vitality and viability of town and local centres
- Improving retail choice and the balance of retail and other town centre uses
- Supporting local people to make healthier choices
- Attracting and facilitating town centre investment
- Protecting essential shopping services for local communities

### **Social Infrastructure**

- The creation of healthy, cohesive, inclusive and safe environments
- Providing adequate community facilities and infrastructure to meet the needs of a growing population and facilitate social interaction
- Identifying appropriate locations for community facilities

### **Business, Employment and Enterprise**

- Addressing employment inequalities and reducing the barriers to employment
- Increasing employment opportunities through training to increase skills
- Maintaining concentrations of employment floorspace in key accessible locations
- Improving land use efficiency through managed release of surplus

employment land.

- Providing space for businesses of all sizes to establish and grow.
- Protecting space for small and medium sized enterprises
- Improving the educational attainment, skills and aspirations of residents

### **Transport**

- Improving the transport network and infrastructure
- Providing and maintaining sustainable transport choices for all members of the community
- Reducing congestion and pollution
- Managing delivery and servicing activities
- Improving accessibility by public transport

### **Sustainability**

- Mitigating and adapting to climate change
- Minimising flood risk and improving resilience to flood risk.
- Improving recycling and the management of waste.
- Improving energy efficiency and use of renewables
- Providing opportunities for heat and power networks.
- Improving air quality and decreasing level of emissions from industry, residential, construction and traffic.
- Need for sustainable use of water resources
- Need to ensure that there is social, physical and green infrastructure capacity for existing and future needs
- Reducing the impact of noise
- Ensuring high standards of sustainable design are achieved in the built environment.
- Health risks from toxicity of contaminated land
- Opportunities for food growing – active lifestyles, healthy diet and tackling food poverty

## 6 Options-testing for the NSP

### The Assessment of Options

- 6.1 This section outlines and provides a summary on the options that have been considered for the New Southwark Plan.
- 6.2 In addition to the options presented below, the development of the policies within the New Southwark Plan and the justification for their evolution is set out within the following Background Papers:
- Industrial Background Paper
  - Housing Background Paper
  - Offices Background Paper
  - Retail Background Paper
  - Infrastructure Background Paper
- 6.3 These extracts are provided at Appendix 13. This does not include all policies of the Plan. It includes the main industrial, housing, office and retail policies and the policies which have been changed from the Southwark Plan 2007 (saved policies) and the Core Strategy 2011.
- 6.4 As set out earlier in the report, in response to the Inspectors' letter, the IIA has been updated to clearly detail our reasonable alternative options considered during the preparation of the New Southwark Plan.
- 6.5 As part of the preparation of the New Southwark Plan, three 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).
- 6.6 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).
- 6.7 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.
- 6.8 The reasonable alternatives considered are set out within Appendix 12 and Appendix 12a. Appendix 12 demonstrates how the capacities have changed throughout different iterations (Preferred Option; Proposed Submission Version and Proposed changes to the Submitted NSP, Main Modifications) of the Plan. Appendix 12a sets out the alternatives considered of spatial dimensions and highlights the chosen option.

### What options have been considered and why?

- 6.9 The NSPPO consultation sets out the council's proposed strategy for planning and regeneration in Southwark to help deliver the Fairer Future promises in the Council Plan, in conformity with the ambitious targets for development in the borough set by the London Plan. The NSPPO also stated that the final version of the NSP would contain area visions setting out aspirations for places and site allocations with specific requirements for land uses and densities for development.
- 6.10 Part of the NSP strategy is to build more homes of every kind in Southwark, and to use every tool at the council's disposal to increase the supply of all different kinds of homes in the borough. The strategy also aims to revitalise neighbourhoods and work to make sure Southwark has a strong economy, identifying regeneration areas extending across most of the borough including London Plan opportunity areas and local action areas.
- 6.11 We have also assembled an extensive evidence base which confirms both the need and opportunity for large scale redevelopment of land in Southwark as well as the need for planning policy to guide development to ensure that it is sustainable, equitable and supports health and wellbeing.
- 6.12 Within this context, potential NSP AVs&SA options were assessed for their 'reasonableness' prior to being taken forward for appraisal. This involved considering a series of questions:
- will implementation of the option assist in fulfilling the objectives of the NSP?
  - is it a genuine option?
  - will the necessary resources be available to deliver the NSP?
  - will there be sufficient time within the plan period to implement the option?
  - is there an unacceptable risk that the option will not be fully implemented for one reason or another?
  - is the option sufficiently flexible to accommodate changing circumstances?
  - does the option generally conform with the London Plan and NSP?
- 6.13 All options were assessed against the IIA framework set out in Appendix 10.

#### ***Option A: Business as Usual***

- 6.14 Option A involves the description of Area Visions and the identification of Site Allocations but relies on other local plan policies in the NSP and London Plan to determine planning applications. This Option does not provide any significant new material guidance for development, such as site development capacities, land use, infrastructure requirements or design criteria. Area Visions describe the character of areas and the council's broad regeneration aims but do not seek to shape the contribution of development opportunities within each area.
- 6.15 This option selects sites for allocation from the potential sites consulted on at the NSP Options stage, land identified through an ongoing call-for-sites, the London Strategic Housing Land Availability Assessment (SHLAA), and by planning and regeneration officers. All sites of sufficient size, generally above 0.25 ha, and where clear constraints on development would not prevent comprehensive redevelopment, are allocated as opportunity sites for development.

### *Summary of Option A*

- 6.16 This option would help to deliver the NSP strategy by encouraging development on sites that could make a significant contribution to regeneration. Planning applications would be determined in line with planning policies in the same way as proposals on other sites that are not allocated. Area visions would have limited implications on planning proposals but would help communicate the council's goals to developers and other stakeholders. This option quantifies the strategic development opportunities in the borough allowing estimates of growth to demonstrate how key objectives, such as housing delivery, would be met; it is therefore a genuine reasonable alternative.
- 6.17 Option A would not present fundamental barriers in terms of resources, time or risks as it relies on the routine operation of the planning department. Flexibility is offered as changing circumstances would be reflected in other material considerations in the determination of applications. General conformity with the London Plan and NSP would be achieved through the application of their policies but it would only achieve the minimum towards their goals.

### ***Option B: Place Making and Place Shaping***

- 6.18 Option B sets out Area Visions and Site Allocations as per Option A. However, alongside the description of Area Visions and identification of Site Allocation there is additional policy and guidance that is material to the determination of applications. It thereby takes a proactive approach to place making and place shaping, integrating sites with their context and steering growth to deliver the regeneration strategy.

### *Area Visions*

- 6.19 In this option, Area Visions provide a more specific strategy for each area, the associated policy and guidance must be taken into account by all relevant development proposals in the borough. They set out key infrastructure requirements, opportunities for public realm and transport improvements and growth opportunities for new homes and jobs. Area Visions also identify the prevailing character of different places to be conserved or enhanced.

### *Site Allocations*

- 6.20 In this option, Site Allocations set out the land uses that *must* and *should* be provided as part of any redevelopment, and other acceptable land uses that *may* be provided. Site Allocations set out either the minimum or indicative housing capacities to be delivered. Indicative development capacities for housing were inserted into the New Southwark Plan site allocations as requested by the Inspectors, along with the housing trajectory which indicates the expected housing delivery within the borough, including through site allocations.
- 6.21 Following discussions at the Hearings to the Examination in Public and as requested by the Inspectors, the capacity requirement for Site Allocations has been amended within the Main Modifications: Site Allocations which 'must' provide housing have a minimum capacity which is expected to be delivered and will contribute towards

meeting our housing need. Site Allocations which 'should' provide housing have an indicative housing capacity; this is not a minimum or maximum capacity but will indicate the scale of development that is likely to be acceptable and will be encouraged. A site allocation may also provide site specific design guidance that should be considered in the event of redevelopment.

- 6.22 Housing is a required or encouraged use on most sites. As well as maximising the provision of new homes, this will help to ensure that all sites have the potential to generate an increase in land value to incentivise development. Our housing requirements are met through site allocations which 'must' provide housing, including sites in the Old Kent Road Opportunity Area.
- 6.23 In the CAZ, the re-provision or uplift of employment floorspace is a 'must' requirement in the site allocations. Housing is a 'should' which encourages mixed use development where the re-provision or uplift of employment floorspace can be achieved.
- 6.24 As identified in the 5 and 15 Year Housing Land Supply, our strategic housing target as set out in the London Plan 2021 2,355 per annum or 23,550 over the 10 years, our target can be met with addressing the under delivery in 2019/2020 and a 20% buffer with Option B. The annual target can also be met over the 15 year period.

#### *Housing development capacities within the site allocations*

- 6.25 The key purpose of the housing development capacities is to ensure Southwark can meet its future strategic needs for new homes, jobs, public open space, public access routes, transport and social infrastructure. It will ensure the Council has an understanding of the strategic distribution of development expected to come forward across the borough over the course of the plan period.
- 6.26 The housing development capacity of site allocations within Option B and set out within the Plan have been determined through the design led approach which is set out in detail within Site Allocations Methodology Report, Section 4 (May 2021). The capacities are informed by:
- Sites that benefit from Planning Permissions that have undergone detailed design
  - Masterplans that have a high level design (e.g. live planning applications or Old Kent Road site allocations where masterplanning has been undertaken)
  - Sites that have not had previous development design work, and this is where the design-led approach has been applied.
- 6.27 Where an approved application is relevant to a site allocation, it is considered that the planning application represents the optimum use and capacity of the site, as this has been tested by a planning application.
- 6.28 The site capacities have taken into account consultation responses; approved planning applications and any masterplanning work to better reflect site-specific circumstances and respond positively to the site context and policy requirements set out in the NSP.
- 6.29 Where appropriate, in Option B the higher capacities have been taken forward to be the minimum development capacity to take into consideration representations received, recent engagement from developers to redevelop the site, with

masterplanning being undertaken, where this capacity better optimises the use of the site.

- 6.30 In some instances the higher capacity options were not appropriate to be taken forward in Option B, as they did not optimise the use of the site. The consideration of these higher capacities would require detailed design and masterplanning to truly understand the impact on the wider area.
- 6.31 In this option, site allocations are selected through the same process described for Option A. The site capacities are the most appropriate figures for Option B.
- 6.32 The Site Allocations Methodology Report, Section 4 (May 2021) provides further detail on the other options considered and sets out why they were not carried forward for calculating site capacity, these considerations were density and floor to area ratio.
- 6.33 Significant growth is expected in addition to the site allocations identified within then NSP. Although certain site allocations have been omitted from the NSP (reasons for omission are set out within Appendix 1 of the Sites Allocations Methodology Report (May 2021)) the redevelopment of a number of these omitted sites can be achieved through NSP policies, where acceptable. These sites were mainly omitted for the following reasons:
- Small site without the clear opportunity for major intensification where acceptable redevelopment could be achieved under other NSP policies. If these sites come forward these are classed as windfall sites (see below).
  - It has been recently redeveloped and is therefore unlikely to come forward during the life of plan period.
  - Development is already under construction on the site.
  - Redevelopment could be achieved under other NSP policies.
  - The site owner has confirmed there is no prospect of the site being redeveloped.
- 6.34 As part of this option, it is expected that given the policy and guidance set out in the NSP, windfall sites will also contribute to delivering growth, infrastructure and design outcomes sought by the London Plan and NSP. Windfall sites are defined in the glossary chapter of the NPPF as sites not specifically identified in the development plan. Paragraph 70 of the NPPF states that, a windfall allowance may be justified as part of the supply, if the local planning authority has compelling evidence that windfall sites provide a reliable source. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends. The 5 and 15 year housing land supply report sets out that in the past significant development of housing has been delivered in Southwark on windfall sites.

#### *Old Kent Road site allocations*

- 6.35 The residential capacity options for the Old Kent Road allocations set out in Option B are based on Opportunity Area wide options which were considered in the 2016 Allies and Morrison Place Making Study for the Old Kent Road. These three options were based on the delivery of the Bakerloo Line Extension:

- High density scenario – 2 new stations
- Medium density scenario – 1 or 2 new stations
- Low density scenario – no Bakerloo Line Extension

6.36 The London Plan sets out that the Old Kent Road Opportunity Area should be able to deliver 12,000 homes and 5,000 jobs. Other Local Development Studies and Urban Design Studies have been undertaken, which make up the evidence base for the Old Kent Road Area Action Plan 2017. Based on these it was decided that the Old Kent Road could exceed the target set out by the London Plan and achieve the delivery of 20,000 homes and 10,000 jobs over a 20 year period.

6.37 Continuous masterplanning work, which takes into account planning applications and various constraints, has been undertaken for site specific allocations to come to the capacity as various iterations of the AAP have been published. Further masterplanning work has been carried out for the latest version of the AAP (December, 2020) which increased the capacities for some sites. Where capacities are decreasing (e.g. NSP55 Mandela Way) it is due to the reduction of residential floorspace to increase employment floorspace.

6.38 The site allocations within the Old Kent Road will be intensified for mixed use development and industrial co-location. Development will include an innovative new approach to create new town centres which include community facilities, retail, office, education and health uses. Industrial development will be included alongside or underneath new homes with specific design criteria to ensure businesses can operate successfully without harming residential amenity.

#### *Summary of Option B*

6.39 In addition to encouraging development in general, this option would seek to fulfil the NSP objectives by providing greater certainty as to the broad parameters of acceptable development within Area Visions and on specific Site Allocations which informs Table SP1b in the Plan, setting out development expected in each vision area.

6.40 This option would ensure we exceed our housing target (as demonstrated within the 5 and 15 Year Housing Land Supply). It would also secure land for infrastructure and deliver an uplift in certain land uses, such as those generating employment and contributing to the growth of economic clusters.

6.41 In resource, time and risk terms this option should be beneficial in clarifying the priorities for different areas and the status of sites upfront – de-risking development. While creating certainty could be less flexible, this option allows a range of acceptable land uses, avoids absolute capacity limits and through the application of other local plan policies it will still allow development to respond to changing circumstances. This option would seek to proactively deliver growth, infrastructure and design outcomes sought by the London Plan and the NSP.

6.42 Option B represents the optimum capacity for development across the borough which would help achieve the strategic objectives of the Plan and growth during the plan period by being sympathetic to site surroundings, meeting the site requirements set out in the Plan and by taking into account site considerations and policy designations.

### ***Option C: Higher option***

- 6.43 In response to the Inspectors' letter in April, 2020 the IIA has been updated to clearly set out the Council's considerations of the reasonable alternative for planning for growth on each site allocation as part of Option C: Higher Option. The sustainability appraisal is set out in Appendix 12.
- 6.44 Option C sets out Area Visions and Site Allocations using the same approach as Option B, i.e. there is additional policy and guidance in the Site Allocations that is material to the determination of applications.

### ***Site Allocations***

- 6.45 Option C determines a higher capacity of housing using the methodology set out within the Site Allocations Methodology Report but increasing the capacity through either a larger development footprint or an increased number of storeys on the building. The capacity of the site allocations as part of the Old Kent Road Area Vision are explained above within Option B which would be consistent for Option C.
- 6.46 Where the capacity of a site allocation has been reduced during the plan making process to take into account site constraints to delivery and the site context, the previous higher capacity represents the high capacity in Option C.
- 6.47 The higher option capacities are indicative, if a development proposed within a site allocation achieved a higher capacity it would need to be considered against the existing site context and surroundings, the site specific policy and guidance, the other development management policies in the NSP, London Plan and SPDs.
- 6.48 The higher option is applied only to residential development capacities identified in Option B. This is because many site allocations contain existing employment floorspace. In suitable locations, sites seek the re-provision of the existing quantum of employment space as a minimum or 50% of the total floorspace, whichever is greater.
- 6.49 As with Option B, significant growth is expected in addition to the site allocations within Option C. Although certain site allocations have been omitted from the NSP (reasons for omission are set out within Appendix 1 of the Sites Allocations Methodology Report (May 2021)) the redevelopment of these omitted sites, where acceptable, could be achieved through NSP policies.
- 6.50 As part of this option (as with Option B), given the development management policies set out in the NSP, windfall sites would also contribute to delivering growth, infrastructure and design outcomes sought by the London Plan and NSP.

### ***Option C Summary***

- 6.51 Option C would significantly increase the delivery of homes and affordable homes in the borough, which is a priority locally, nationally and regionally and would deliver benefits to residents. This needs to be carefully balanced against the delivery of other uses which have other economic, social and environmental benefits.

- 6.52 A higher capacity of housing on sites could impact on the delivery of employment. A higher capacity of employment uses could impact on the delivery of housing. Given our requirements for the provision of employment floorspace, along with the intensification of these sites with housing, retail, education community spaces and open space, a balance has to be struck to ensure we can meet our identified need and strategic targets for jobs and homes within the borough. Option C would jeopardise the delivery of these requirements collectively.
- 6.53 An increased housing capacity also provides uncertainties on the planned social and transport infrastructure in the borough and London and whether this would meet the demand of more residents. The impact of the increased capacity on the borough's heritage asset, borough views and open space, green corridors and biodiversity would also be uncertain.
- 6.54 Given the uncertainties with Option C and the potential detrimental impact on the delivery of important employment generating uses, this has not been carried forward in the New Southwark Plan.

#### **What have the options identified?**

- 6.55 Each option is considered against the 17 identified IIA objectives incorporating SEA objectives, sustainability, health and equality. The full appraisal can be found in Appendix 10. The assessment summarises the impacts and gives an overall score based on the opportunities the Plan could offer in each scenario. The following summary explains the results and gives a qualitative analysis of the complexities and challenges of the two alternative approaches.
- 6.56 Option A generated a high degree of uncertainty around its effects, particularly in the medium to long term. Through identifying land for development but without detailed guidance, opportunities to meet the IIA objectives are unlikely to be taken. Although other local plan policies will secure positive effects, they may not always be as successful without policy guidance providing coordination. In particular, infrastructure that requires land for its delivery would be more challenging to bring forward. In the medium term, delays to infrastructure delivery could slow development overall and a favourable balance between housing and land uses providing services and employment would less likely be achieved. At least some minor negative social impacts in the long term would be anticipated as these outlined uncertainties would impact particular groups.
- 6.57 In the short term Option A would be neutral, with positive effects attributed to accelerated redevelopment of sites providing employment in construction, remediating land and delivering much needed new homes. If this option was taken forward then the assessment indicates that the plan would be highly reliant on development management policies to mitigate potential negative effects. These policies may need to be revisited in light of the need to create certainty on how employment growth will be supported, infrastructure will be delivered alongside affordable housing and cumulative environmental effects mitigated.

- 6.58 The assessment indicates that Option B would result in wide ranging positive effects by giving a clear idea of how each development site and the regeneration of vision areas can contribute towards an overall strategy for sustainable growth. Major positive effects are attributed to the delivery of education and health facilities, business space, open space, green infrastructure and new housing including affordable homes. As with Option A, this would rely on the implementation of the development management policies of the plan to secure positive effects and mitigate negative ones. The addition of place making and place shaping guidance to these policies generates overall positive scores.
- 6.59 Option B would leave some residual uncertainty for which further mitigation to minimise any negative effects could be considered. There may be opportunities to go further in supporting the mitigation of some environmental effects and in the delivery of care facilities. These areas will be considered further as part of council-wide strategies.
- 6.60 Option C indicates there would be positive impacts as a result of the increased housing supply including affordable homes, which could be achieved by taking forward the high capacity options on all site allocations, however, this could compromise the delivery of employment floorspace. Option C generated a high degree of uncertainty around its effects overall. The sustainability appraisal indicates that as a result of higher capacity options the impacts of high density developments are uncertain on: the historic environment and cultural assets; open spaces, green corridors and biodiversity; and the provision of adequate infrastructure to support existing communities and the future growth. Whilst proposals will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy, it would need to be assessed if the contributions would sufficiently offset the impacts of the development.

**What option was chosen for the Proposed changes to the Submitted New Southwark Plan and maintained in the Main Modifications to the New Southwark Plan and why?**

- 6.61 The Proposed changes to the Submitted New Southwark Plan was been prepared in accordance with the principles outlined in Option B. This is also presented in the Main Modifications to the New Southwark Plan.
- 6.62 Option B provides in excess of our housing targets for housing without compromising other strategic aims of the borough, including good design principles, heritage, provision of non-residential uses and open spaces. Option B also provides a healthy buffer of housing, over our London Plan housing target which is identified in the 5 and 15 Year Housing Land Supply Report.
- 6.63 Appendix 10 (Table 1) sets out the averaged scoring for the three options against the 17 sustainability objectives, encompassing economic, social and environmental aspects. The options appraisal found that Option B: Place Making and Place Shaping would have an overall score of 59% against the sustainability objectives and this option would result in positive impacts overall. 12 of 17 objectives received a positive scoring in achieving the sustainability objectives.
- 6.64 This option will provide more positive social, economic and environmental benefits than Option A or C, which will improve the health and wellbeing of Southwark's communities.

- 6.65 The benefits anticipated through this preferred approach will be achieved through securing growth in housing, employment, town centre amenities, primary health and care facilities, school places, higher education and public open spaces. They will also be served by enhancing and expanding physical networks of sustainable transport and habitats for wildlife, social interaction and economic interaction within local business clusters.
- 6.66 Guidance in the NSP will complement local plan policy requirements through site specific information so that it is understood how proposals can integrate into their local context and help to deliver area visions. The positive effects of these policies will thereby be enhanced.
- 6.67 The options appraisal considers Option A to have an overall neutral score of 17%, and this option would have overall neutral social, economic and environmental impacts. The majority of the objectives in this option have scored uncertain (11 out of 17) and neutral (4 out of 17). The sustainability appraisal found that without the identification of land to provide infrastructure, including new education, health facilities and open space and without the identification of area-wide improvements the delivery of infrastructure would be uncertain and less coordinated. Furthermore, without guidance on sites and areas, opportunities to improve places for community cohesion and support for a diversity of lifestyles could be missed. Without guidance the full consideration of heritage assets and opportunities for heritage-led regeneration might not be incorporated into development proposals; and without the identification of opportunities for new open space and green links sufficient space might not be provided to serve the needs of a growing population or habitats provided and connected for wildlife.
- 6.68 Option A has not been taken forward, whilst it would be a reasonable alternative to identify opportunity sites for development and rely on other local plan policies to shape growth, the social, economic and environmental effects would be deeply uncertain.
- 6.69 The options appraisal considers Option C to have an overall neutral score of 41%, and that this option would have overall neutral social, economic and environmental impacts. The majority of the objectives in this option have scored uncertain (6 out of 17) and neutral (4 out of 17). Option C has not been taken forward, because whilst it would be a reasonable alternative, and there would be positive impacts as a result of increased housing delivery, the social, economic and environmental impacts on the borough would be deeply uncertain and the mitigation against any negative impacts would be highly reliant on development management policies. Given our requirements for the provision of employment floorspace, along with the intensification of these sites with housing, retail, education community spaces and open space, a balance has to be struck to ensure we can meet our identified need and strategic targets for jobs and homes within the borough. Option C would jeopardise the delivery of these requirements collectively.

### **What are the significant positive effects?**

- 6.70 Accelerating the delivery of housing development will provide major contribution towards providing everyone with the opportunity to live in a decent home. By creating certainty around the requirements for other land uses and infrastructure on site

allocation this will also support affordable housing delivery by allowing the more accurate understanding of development costs in the valuation of land.

- 6.71 Option B more than meets our London Plan 2021 housing target as detailed in the 5 and 15 Year Housing Land Supply without compromising our other strategic aims of the borough including good design principles, heritage, provision of non-residential uses and open spaces.
- 6.72 The plan generates major positive effects to tackle poverty and encourage wealth creation. The acceleration of development in most areas will create jobs in construction. Where a significant uplift in commercial floor space is planned for there will be further increases in employment opportunities. The opportunity for the occupation of affordable workspace to provide support for start ups, small or independent businesses is vital to secure Southwark's thriving economy. This will include job opportunities secured for local people as well as procurement opportunities for other local businesses. Support for the most promising economic clusters within the borough will generate higher wages and economic resilience.
- 6.73 The policies seek to retain some of the previously removed Strategic Protected Industrial Land and to allocate a couple of the sites as Locally Significant Industrial Sites (LSIS); this will ensure the retention of the businesses and employment on these sites.
- 6.74 The expansion of the Camberwell Town centre will ensure that additional local employment can be accommodated to sustain this town centre and securing growth for this part of the borough.
- 6.75 The introduction of the Aylesbury area vision and site allocation provides further guidance for development in Aylesbury. It specifies that development should generate new neighbourhoods with a range of housing tenures that will attract existing residents to stay and new people to move in, including Southwark residents who want to stay and benefit from the great connections, facilities and communities. It also requires development to establish a local hub with a range of community facilities including a new Health Centre, Library, pharmacy café and public square, which will benefit residents.
- 6.76 The health of the population will be improved by encouraging active lifestyles and wellbeing through a network of green links, cycle routes and open spaces across the borough and maintained by additional health and care facilities. These will provide the opportunity to deliver integrated health services to improve the quality of their operation. Public spaces, public realm, cultural facilities and a flexible range of new town centre amenities will have major long term positive effects to promote social inclusion, equality, diversity and community cohesion by creating spaces for interaction as well as a diversity of different lifestyles.
- 6.77 In parts of the borough redevelopment will deliver area-wide improvements in the architectural quality of buildings and the public realm alongside new or enhanced open space and urban greening. These will deliver major positive effects and enhance the quality of landscape and townscape.

#### **What are the significant negative effects?**

- 6.78 The plan does not generate major negative effects in the appraisal although there are residual areas of uncertainty, discussed further below, which could result in negative effects; particularly where they are cumulative in nature.
- 6.79 The site allocations and area visions seek to steer development opportunities that already exist towards delivering a sustainable regeneration strategy. Furthermore they are supported by the strategic and development management policies to further mitigate negative effects.
- 6.80 The appraisal does indicate minor negative effects in the short term in some areas towards social inclusion, equality, diversity and community cohesion. This is related to the loss of some community assets in the short term, which may impact particular groups, and the potential disruption of social interaction through the impacts of construction. This would be in locations where the acceleration of development brings forward a number of sites concurrently within a small area as development management policies will seek general mitigation of the impacts of construction. The appraisals indicate that this disruption will occur in areas that will likely accrue more significant benefits in the long run towards this sustainability objective. Nevertheless, opportunities for further mitigation in the short term could be explored through targeted community infrastructure development and the coordination of quick wins from regeneration and meanwhile uses.

### **Uncertain impacts**

- 6.81 The plan provides a positive strategy for growth however there are some impacts that may be uncertain at this stage.
- 6.82 Option B sets out the housing capacity for each site which enables us to meet our 5 and 15 Year Housing Land Supply based on the London Plan target. The housing supply includes windfall sites (as set out in the Planning Practice Guidance and detailed above) which comprises an average of past delivery.
- 6.83 The housing land supply also includes the delivery of homes through the Old Kent Road site allocations, which comprise approximately 20,000 homes as part of the agreed phasing with Transport for London and the Greater London Authority. Approximately 15,000 homes are expected to be delivered in 6-15 years and it is noted within the 5 and 15 Year Housing Land Supply Report that there is sufficient capacity to carry delivery forward to 2036 if some of the site allocations are not delivered up to 2035.
- 6.84 Within the 6-15 year supply there is a buffer of 9,860 homes in addition to the London Plan 2021 target. It is important to have a buffer in our housing land supply as all homes that are approved are not always delivered and having a buffer will increase our potential to meet our housing target.
- 6.85 This buffer is important as all of the homes in the pipeline and the windfall sites may not come forward or these homes may fall into later supply beyond the 15 years planned. However, the delivery Phase 2 homes (approximately 10,500 homes) rely on the Bakerloo Line Extension (BLE) as this has been agreed through a phasing plan with the GLA and TfL. The BLE is critical for the long-term planning for delivering

homes in the Old Kent Road, including beyond the Old Kent Road Action Plan Area timeframe.

- 6.86 Southwark Council together with Lewisham have been actively campaigning and promoting the BLE given its importance for the delivery of homes in the boroughs. This infrastructure is essential to meet our future housing need, given the planned delivery of new homes in the Old Kent Road Opportunity Area in Southwark and New Cross and Catford Opportunity Areas in Lewisham. Both parties are also working with the Greater London Authority and Transport for London to develop these proposals for the BLE and to make the case to government to ensure the project is delivered. We have agreed a phasing plan for the delivery of these new homes with the GLA and TfL which can be found at Appendix 3 of the Site Allocations Methodology Paper.
- 6.87 The Department for Transport made a safeguarding direction in March 2021 for the Bakerloo Line Extension which will support the project in safeguarding sites and routing alignment. The Bakerloo Line extension will enable the planned development for Phase 2 to be delivered and will provide a further catalyst for change.
- 6.88 However, should the BLE not be delivered or delivery be delayed, this could significantly impact upon our housing land supply for years 6-15 and beyond should some pipeline permissions, site allocations or windfall sites not come forward.
- 6.89 While on the whole the allocation of flexible employment space will have major positive effects for the local economy and employment, redevelopment of sites will in several instances result in the loss of existing businesses. For lower value storage or industrial space or where businesses are less compatible with existing land uses similar operations may be challenging to re-incorporate. In order to maintain and enhance economic diversity there may be further opportunities for mitigation from regeneration and engaging stakeholders to curate the offer of commercial space within vision areas.
- 6.90 Sustainable transport improvements and greening will help to mitigate the causes of climate change. However, traffic congestion impacts of construction could add to emissions in some locations. There may be further opportunities to reduce emissions overall all in the medium to long term through decentralised energy. If opportunities are identified for area-wide energy networks beyond those proposed in the Old Kent Road area, there could be scope for the final version of the NSP to further support their delivery. Congestion could similarly affect air quality and there may be as yet unidentified opportunities for area-wide responses.
- 6.91 Within critical drainage areas policy will seek flood risk assessments and sustainable drainage measures. Where redevelopment is particularly concentrated there may be a greater risk of cumulative impacts. Opportunities for strategic solutions to manage any risk could be further investigated.

### **Cumulative impacts**

- 6.92 The SEA Directive requires an assessment of secondary, cumulative, and synergistic effects, which should be incorporated in the SA. Collectively these effects are called cumulative impacts. Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects (e.g. noise, dust and visual) have a combined effect.

- 6.93 Synergistic effects interact to produce a total effect greater than the sum of the individual effects. The potential of these are outlined in Appendix 10. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity. For example, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.
- 6.94 There could be cumulative impacts with development occurring in Southwark and the surrounding boroughs. Engagement is continuous with these boroughs to ensure the cumulative impact of development can be realised and mitigated where required. In particular, Lewisham also has significant growth planned within the Opportunity Areas, there is continuous communication with Lewisham to ensure there is the required infrastructure for the planned development. This includes working positively and in cooperation with Greater London Authority and Transport for London to support the business case for, and secure delivery of, the Bakerloo Line Extension which will run through Old Kent Road, Lewisham and beyond to Hayes. Further information on this can be found in the Site Allocations Methodology Report Appendix 3.
- 6.95 A number of other Statements of Common Ground have been prepared with the surrounding boroughs and the GLA and TfL which can be found on the Examination webpage:
- Bromley
  - Bexley
  - City of London
  - Greenwich
  - Tower Hamlets
  - Westminster
  - Lambeth
  - Croydon
- 6.96 These agree to continue to work together on strategic matters with other boroughs, GLA and TfL.
- 6.97 The growth planning within the New Southwark Plan is within the context of the adopted London Plan through which has impacts across London have been tested.
- 6.98 The cumulative impact of policies with a minor negative or uncertain impact could result in a major negative impact overall. It is difficult to assess the extent of such impacts at this stage in the process with the lack of detailed information on the design of proposals for individual sites. Providing that suitable mitigation measures are applied to individual proposals it is considered that the potential negative impacts will remain minor and, with the development of new technologies and regulations, could even be reduced further over time. Cumulative impacts may also be positive – for example several minor positive impacts on open space and biodiversity could lead to a major positive impact for an area as a whole.

6.99 The cumulative impacts of the policies will need to be kept under review through the monitoring process and assessment of planning applications to measure the success of implementing the policies and inform any amendments that may be needed to policies and guidance.

### **Proposed mitigation**

6.100 Where the SA identified potential shortcomings, mitigation measures are proposed to help off-set the negative impacts. To a large extent mitigation measures are provided in the Main Modifications to the New Southwark Plan for development management policies. To mitigate against the loss of businesses as set out under uncertain impacts, Policy P32 (Business Relocation) which aids the uncertainty and assists existing businesses as much as possible.

6.101 The following measures warrant further investigation following potential negative consequences of selecting Option B: Place-shaping and plan-making:

- short-term offsets to benefit communities disrupted by concentrated largescale construction;
- curation of business space;
- de-centralised energy networks;
- air quality improvement;
- strategic sustainable drainage systems and flood risk.

6.102 These will be cross-examined in further detail in the IIA appraisal summary included in the following chapters, to identify whether the benefit of policies outweigh risks.

### **Uncertainties and Risks**

6.103 The conclusions that were reached in undertaking the IIA of the Modification to the New Southwark Plan are a result of both quantitative and qualitative (i.e. subjective) judgement by planning professionals within the council. In addition, predicting the outcome of a potentially complex mix of social, economic and environmental factors is an inherently difficult task to undertake, and can only be undertaken on the basis of the background data that is available.

6.104 Consequently, the way area visions and site allocations were ranked against particular sustainability objectives may be subjective. However, whilst some rankings are assessment individually, it is the overall performance of policy against the IIA Framework (Appendix 4) taken as a whole, which is the most important element to consider.

## 7 IIA Appraisal Methodology

- 7.1 The establishment of appropriate objectives and indicators is central to the assessment process and provides a way in which the performance of the policies can be assessed. By researching specific issues affecting Southwark through a detailed desktop analysis and internal discussions, seventeen objectives (Appendix 4) were developed that formed the basis of the IIA appraisal methodology and assessment. The associated baseline indicators table, for which the IIAOs are to be continuously monitored, has been included in Appendix 9.
- 7.2 Upon developing an appraisal, each of the development management policies are grouped into six strategic policy areas identified in the NSP and summarised as such as part of the following appraisal chapter.

### **IIA Topics derived from Strategic policies within the Main modifications to the New Southwark Plan**

- 7.3 The IIA appraisal is reflective of the move towards integrating impact assessments for the Plan, linking the Sustainability Appraisal, Health Impact Assessment and Equalities Analysis. The sustainability, equalities and health impacts of policies have been assessed with reference to the following 'strategic policy' areas outlined in the Main Modifications to the New Southwark Plan to ensure a consistent approach is used by the IIA. Each strategic policy area relates to a particular topic or set of related topic areas. These have been revised and identified for use by the IIA to include:
- SP1a – Southwark's Development Targets
  - SP1b – Southwark's Places
  - SP1 – Homes for All
  - SP2 – Southwark Together
  - SP3 – A Great Start in Life
  - SP4 – A Green and Inclusive Economy
  - SP5 – Thriving Neighbourhoods and tackling inequalities
  - SP6 – Climate Emergency
- 7.4 In this updated version of the IIA, an assessment of SP1a and SP1b has now been included in Appendix 6.

## Method of Assessment

- 7.5 This section explains the approach and methods for the IIA of the Main Modifications to the New Southwark Plan. The IIA Framework presented in Appendix 4 form the basis for assessing the NSP policies (strategic, implementation and development management), site allocations and area visions. That includes the indicators that will be used to continuously monitor each of the IIA objectives (IIAOs). Appendix 4 also sets out the IIA objectives and associated questions that have been asked when undertaking the appraisal methodology, to ensure that the IIA objectives are consistently appraised across all of the strategic, development management policies, implementation policies, area visions and site allocations.
- 7.6 The IIA is structured under the objectives in the IIA Framework Appendix 4, which incorporate topics in the SEA Directive (Appendix 1). This provides a framework and structure to evaluate the likely significant effects of the policies within the Main Modifications to the New Southwark Plan against these key sustainability appraisal topics determined above, which include health and equality. The appraisal takes short, medium and long term effects into consideration, but does not explicitly determine on each of these basis separately.
- 7.7 The appraisal is undertaken using professional judgment, supported by the baseline information and wider evidence base.
- 7.8 A summary appraisal commentary alongside the system of symbols is provided in Appendix 5, 6 & 7 of this IIA report to set out any significant effects identified for the Main Modifications to the New Southwark Plan policies, area visions / site allocations and implementation policies, along with suggestions for mitigation or enhancement to be made where relevant. The nature of the likely effects (including positive/negative, duration, permanent/ temporary, secondary, cumulative and synergistic) are described, along with any assumptions or uncertainties noted. Where necessary, the appraisal commentary also identifies any potential cumulative effects for that option.

Symbol and colour	Scoring Value (%)	Score	Description
✓✓	100	Major or direct positive	The proposed option/policy contributes significantly to the achievement of the objective.
✓	50	Minor or indirect positive	The proposed option/policy contributes to the achievement of the objective but not significantly or indirectly.
-	0	Neutral	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
x	-50	Minor or indirect negative	The proposed option/policy detracts from the achievement of the objective but not significantly.
xx	-100	Major or direct negative	The proposed option/policy detracts significantly from the achievement of the objective.

?	N/A	Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.
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Table 5.3 Individual scoring metric against each objective included in sustainability appraisals of Appendix 5, 6 and 7

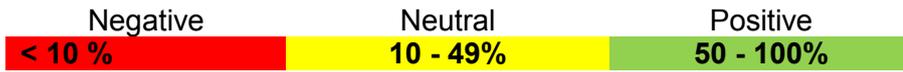


Table 5.4 Ranks of the averages of scoring, in positively or negatively meeting the IIA Objectives. Used in sustainability appraisals of Appendix 5, 6 and 7.

## 8 Appraisal Summary for the Strategic and Development Management Policies

- 8.1 The strategic vision for Southwark is to continue to be a network of successful, unique, historic, distinct places with affordable housing and business space, plenty of shops and cultural activities, open spaces and clean air that are linked together, to Central and the rest of London by an accessible and affordable transport network between 2019-2036.
- 8.2 In response to the Inspectors letter received on 20 April 2020, amendments were made to the submitted Plan. In the Proposed changes to the submitted New Southwark Plan, the following two new strategic policies were added:
- SP1a Southwark's Development Targets
  - SP1b Southwark's Places
- 8.3 SP1a sets out the target that developments need to deliver to achieve growth and improvements as part of the strategic objectives and the council's regeneration strategy. SP1b sets out how we will work with our partners, local communities and developers to ensure that developments improve our places for local communities through delivery of regeneration in our Opportunity and Action Areas to achieve our targets. Policies SP1a and SP1b are overarching policies for all strategic policies (SP1-SP6) setting out targets for growth in each strategic policy and the vision for the Borough in achieving this.
- 8.4 The strategic policies are borough-wide policies which set out the council's regeneration strategy to work with local people to improve neighbourhoods and create new opportunities for the future. They are also used to set the context for our detailed planning policies and to make planning decisions. Development management policies set out further detail which is required to deliver the strategic policies. They are used to assess planning applications.
- 8.5 The IIA appraisal tables in Appendix 6 set out the full appraisal and impacts of the eight (SP1a, SP1b, SP1-SP6) strategic policies which overarch the development management policies and subsequent development management policies. These are assessed against the seventeen IIA objectives in the IIA framework (Appendix 4) and use the baseline indicators as future monitoring of these appraisals (Appendix 9). Each appraisal is grouped by Strategic Policy with development management policy that falls under each overarching strategic policy contained in the Main Modifications to the New Southwark Plan.

## **SP1a. Southwark's Development Targets**

### **Overall Summary: Positive**

- Strategic Policy 1a Southwark's Development Targets sets out the Plan targets over the Plan period. It has been assessed that this policy will have an overall positive future effect on economic, social and environmental sustainability of the borough and the health and equality of residents, workers and visitors. Notably this includes:
- The policy sets targets for housing, employment, jobs and cultural and community uses. The delivery of these will create more inclusive and active places for all. The strategic targets aim to ensure affordable homes and job opportunities are provided for Southwark residents.
- The policy recognises the need to use technology and other building infrastructure to improve air quality and tackle the climate emergency. The implementation of this should be considered alongside policy P64 Improving air quality as well as other policies relating to the climate emergency.
- The need for development such as leisure and sports, sport, health, tourism and education are necessary to create successful places and for supporting the fast pace of change in opportunity areas, particularly where there is an increase in housing
- It is acknowledged that the preservation of historic buildings and open spaces are necessary to build desirable places.
- In conclusion, this strategic policy provides an overview of the growth expected in the borough and highlights necessary activities needed to create successful places. The objectives of this policy work in conjunction with the rest of the Development Management Policies in the Plan

## **SP1b. Southwark's Places**

### **Overall Summary: Positive**

- Strategic Policy 1b Southwark's Places sets out the spatial strategy of the Plan. It has been assessed that this policy will have an overall positive future effect on economic, social and environmental sustainability of the borough and the health and equality of residents, workers and visitors. Notably this includes:
- A spatial strategy to deliver a cohesive and vibrant borough. The policy sets out the capacities for each of the areas in the borough which will allow for the planning of infrastructure and any other necessary activities to ensure vibrant places
- Involving a diverse range of people and working with stakeholders such as the local community to ensure the successful regeneration of places.
- Recognising where most of the development will take place ensures that it is clear where most of the jobs and homes will be located for local residents.

## SP1. Homes for All

### Overall Summary: Positive

- 8.6 Strategic Policy 1: “Homes for All” and the development management policies that sit under it as a topic area (P1-P11) have been assessed as having an overall positive future effect on the economic, social and environmental sustainability of the borough and the health and equality of residents, workers and visitors. Notably this includes:
- An overall increase in affordable homes and private rented sector homes. The provision of affordable homes is encouraged through the fast track route for affordable housing in P1 (social rented and intermediate housing). It also removes the higher bracket of affordable housing in private rented homes, which ensures more affordable private rented homes are delivered for people more in need in Policy P4 (private rented homes).
  - Support for housing for the elderly, people with specialist needs (including wheelchair user homes and wheelchair accessible homes), students. Policy P11 (Homes for Gypsies and Travellers) safeguards the borough’s four existing Gypsy and Traveller sites, as well as making provision for the identification of new sites to meet any identified need for additional Gypsy and Traveller accommodation. The EQIA and Appendix 6 assess the main modifications to this policy and the impacts on those who do not meet the PPTS 2015 definition.
  - The updated policies aim to deliver these new homes, and to optimise the delivery of new homes, requiring more quality housing to be built and should relieve pressure on existing housing stock, reducing homelessness and increasing affordability and security. This security includes the safeguarding of our existing Gypsy and Traveller sites in Policy P11 (Homes for Travellers and Gypsies).
  - Optimising the delivery of new homes at higher densities through sustainable land use on small and infill sites or brownfield land would contribute to Southwark’s housing need and towards its economic growth. This would increase delivery of affordable housing and reduce homelessness, ultimately leading to the improvement of resident’s mental and physical health in the borough under the reassurance that they have a good quality, permanent home.
  - Negative trends in the findings include the contextual challenge of the River Thames flood risk zones and critical drainage areas cover the majority of the borough, therefore any housing development in Southwark will most likely be in an area at risk of flooding, however the appraisal evaluates the provisions the policy makes to ensure that these negative trends are minimised.
  - Flooding was identified as one of the few negative points which intersected with almost all policies. Flooding and critical drainage areas, which are being closely monitored and major development requires strategic flooding assessments. The council is aware of this contextual limitation and aims to protect all development from this environmental threat through additional flood risk reduction and mitigation.

- Average level of benefit were identified for P4 (Private rented homes) and P10 (Self and custom build), whereas all other SP1 policies had high levels of alignment with the IIA objectives.
- P4 (Private Rented homes) has an indirect impact on the IIA objectives because privately rented homes do not directly function to tackle poverty, improve health, reduce the incidence of crime and promote social inequality. Though flood risk is an indirect risk to all of development in the borough, it brings the weighting of P4 policy to an average or neutral appraisal score because of the indirect positive impact this policy will have on other aspects of the IIA objectives. No mitigation is therefore required in regards to this policy as this is covered in separate Strategic Flood Risk Assessment (2017) evidence-base and is not uniquely influenced by the content of this policy.
- In conclusion, SP1 has been positively prepared in regards to the sustainability objectives for the reasons described above. There are certain contextual elements in Southwark which require constant monitoring such as flood risk mitigation. Secondly, there are certain implications for delivering high density housing that could have indirect impact on existing assumptions for delivering environmental sustainable urban development. This is due to the consumption and infrastructure requirements necessary for sustaining increased needs for a larger population. Improving the infrastructure to support the housing delivery targets does provide an opportunity to upgrade efficiency of water, air quality and waste infrastructure. In terms of economic and social sustainability these policies have been positively prepared and no further mitigation is required.

## **SP2. Southwark Together**

### **Overall Summary: Positive**

- 8.7 Strategic Policy 2: “Regeneration that works for all” and the development management policies that sit under it as a topic area (P12-P25) have been assessed as having an overall positive future effect on the economic, social and environmental sustainability of the borough and the health and equality of residents, workers and visitors. Notably this includes:
- The aim of SP2 is to ensure that Southwark makes use of its strategic position as having one of the most ambitious regeneration programmes in the country, and makes sure that the benefits of these developments are captured and provided for the benefit of all of our existing residents. This requires design policies that ensure that our places are revitalized and regenerated to the highest design and environmental standards. Secondly that they recognize the existing contextual heritage and are able to provide sensitive design that enhances these characteristics, ensuring coherency between the new and the old, in the urban fabric. The aim of this policy is for everyone to proud of the places where they live and work.
  - The SP2 development management policies are positively prepared with our sustainability objectives because it supports the highest design quality that protects local character, requires multiple amenity and environmental benefits, it supports strong and cohesive communities, it prioritizes safety and seeks to reduce flooding. It outlines that homes are being built rapidly with most of the change taking place in the

north and center of the borough. Development management policies aim to ensure development is sensitive to local townscapes and existing communities, enhancing what already exists. Southwark's built heritage is recognised as a community asset and is strongly protected.

- Development which provides accessible and inclusive design for all ages and especially for people with disabilities and vulnerable people is supported ensuring future development is in compliance with the Equalities Act 2010, relevant London Plan policies and Part M of the Building Regulations (2010). It therefore seeks to promote protected characteristics and equality in its policies.
- Development management policies support development which ensures high standards of design with commensurate consideration given to visual appearance, composition, aesthetics and detailing. This includes recognising the importance of significant Borough views and panoramas which provide a positive contribution to experiencing Southwark's position in London. Development that does not enhance such views is to be avoided.
- Risks identified by assessing SP2 policies include the recognition that tall buildings can look out of place in their surroundings with a risk of causing unpleasant environmental effects, especially to a given location's micro-climate. The amendment to the tall buildings policy seeks to provide more guidance for the location of tall buildings to minimise impact by locating them in areas where they are considered possible. Risks are also recognised in relation to maintaining the strategic importance and unique character of the River Thames; this is due to the areas environmental sensitivity and intense development pressure. These issues will be addressed through the other policies in the New Southwark Plan.
- P18 (Listed buildings and structures) falls below average in the sustainability appraisal. The reason for this is that there could be a perceived clash with the benefits of protecting heritage listed building and townscapes (IIA12) and other IIA objectives. That is that heritage listings can prevent the optimum sustainability or environmental standards to be met or prioritized in development or retrofitting of a building. This negative impact is outweighed by the cultural and mixed-social benefit of preserving heritage assets to the borough. Furthermore, there are opportunities for climate change and sustainability standards to be met in listed buildings to be improved with modernization of technology.
- The treatment of listed buildings and structures are established in national level policy, required by the Planning (Listed Buildings and Conservation Areas) Act 1990, therefore there are limited amendments that could be made to this policy to make it more socially, economically and environmentally sustainable. There is argument to suggest that utilizing existing sources has short-term reuse benefits that outweighs the carbon costs of demolishing and erecting new buildings, with the costs of producing and transporting materials to site. Therefore in the short-term the benefits of retaining existing buildings are high, but in the long-term whether they are able to meet energy efficient standards and if not, there could be long term detrimental

impact in overall sustainability. It is therefore a mitigation requirement that the sustainability standards of heritage buildings are monitored. Encouraging the retrofitting of existing stocks and the treatment of retrofitting on listed building requires further study as part of the Heritage SPD. The evidence for the carbon emissions of listed buildings has not been captured yet so it is not something that we are able to directly monitor and mitigate against at the present time. For this reason, there has to be an uncertainty weighting with the overall sustainability of this policy.

- P22 (Archaeology) as a process provides no contribution to climate change. The benefits of protecting archaeological finds are considered to significantly outweigh the disbenefits identified in the increase in carbon emissions. Overall there is nothing that can be mitigated from a policy perspective on the management of archaeology to increase sustainability.
- In conclusion, the treatment of sustainability for preserving heritage assets requires further studies that should be published through an SPD rather than required through policy at this stage. With existing technologies SP2 ensures that optimum design and development standards are met which fulfill satisfactory requirements of the sustainability appraisal.

### **SP3. A Great Start in Life**

#### **Overall Summary: Positive**

8.8 Strategic Policy 3: “Best Start in Life” and the development management policies that fall under it as a topic area (P26-P27) have been assessed as having an overall positive future effect on the economic, social and environmental sustainability of the borough and the health and equality of residents, workers and visitors. Notably this includes:

- SP3 aims to support all young people to have the best start in life by ensuring a safe, stable and healthy environment where they have the opportunity to develop, make choices and feel in control of their lives and future. The council believes wholeheartedly in giving young people the best start in life and aims to do so by establishing a new childcare commission bringing together experts, parents, providers and employers to find new ways to guarantee care and early education. The council also aims to make sure there are enough primary and secondary places for all.
- Development management policies recognise that education facilities can significantly enhance the economy and contribute to regeneration by complementing existing uses.
- No mitigation is required as part of the SP3 development management policies which are weighted highly in the sustainability appraisal.

## SP4. A Green and Inclusive Economy

### Overall Summary: Positive

8.9 Strategic Policy 4: “Strong Local Economy” and the development management policies that sit under it as a topic area (P28-P43) have been assessed as having an overall positive future effect on the economic, social and environmental sustainability of the borough and the health and equality of residents, workers and visitors. Notably this includes:

- SP4 outlines that Southwark Council will work to ensure that the Borough has a strong local economy where all residents benefit. The council intends to create more opportunities for people in Southwark to find work, get into training and achieve their aspirations.
- Small and independent businesses make up the majority of businesses in Southwark providing jobs for local people and providing opportunities for start-ups and self-employment. Development management policies encourage the diversification of the local economy and support the retention of existing small and medium enterprises by encouraging the development of affordable workspace. Policy P30 (Affordable Workspace) now specifies 10% affordable workspace in major developments delivering employment space to ensure it is delivered. It also encourages the use of railway arches. Activities supported include business uses, retail and community facilities in railway arches.
- Tourism is promoted by a range of development management policies including those which support proposals for new hotels. To further support the economy, Policy P40 (Hotels and other visitor accommodation) has been amended to require a minimum of 10% of the total floorspace to be provided as ancillary facilities in the hotel developments incorporating a range of daytime uses and other employment opportunities. It is recognised that Southwark’s historic assets can promote and enable tourism opportunities, through the protection of heritage assets and the recognition of the contribution of pubs to the historic character of a given area
- Development management policies aim to help and improve employee education and training programmes. The council’s Economic Wellbeing Strategy (2017)<sup>5</sup> objective of overcoming barriers to employment is supported by policies which promote a targeted approach to improve employment participation within Southwark and an entrepreneurial approach to business, especially amongst young people. The plan also seeks to ensure small and independent businesses, which make up an overwhelming proportion of employers in Southwark, are provided for in development.
- Recognition and support is given to P34 (Town and local centres). These places provide important services and facilities for the borough’s residents and should be the main focus for new developments for town centre uses. The council’s aim is to increase the amount of shopping space in centres and improve the choice of

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<sup>5</sup> LB Southwark ‘Economic Wellbeing Strategy’ (2017)

goods and services while also encouraging the diversification of economic activity within these areas. This should improve access to jobs for all and otherwise contribute to a reduction in poverty.

- Infrastructure, particularly transport infrastructure which provides access to services and jobs for all people is supported by SP4 and associated development management policies. It is outlined that new mixed-use neighbourhoods will require significant investment and enhancement to pedestrian and cycle networks. The potential for other infrastructure enhancements, such as the proposed extension to the Bakerloo line, to drive growth and regeneration within the Borough is also supported.
- P28 (Strategic protected industrial land (SPIL)) falls below average sustainability rating. The protection of SPIL does not necessarily promote sustainable forms of transportation in the borough, as vehicle deliveries are directly correlated with the uses on SPIL and are normally heavily polluting either through exhaust emissions or re-suspended particulates from tyre and break functions. The management of these impacts includes the council working with other stakeholders to ensure that improved technology that is cleaner, and better consolidation or distribution networks, exist within the borough. The implementation of this need to be continuously monitored to reduce the impact of this policy in the future.
- Secondly, P28 (Strategic protected industrial land (SPIL)) presents a risk in promoting criminal behavior and fear of crime. The surrounding public realm around SPIL sites can add to the incidences of fear of crime as it might not be well-integrated, with active frontages and natural surveillance as required by P12 (Design of Places). Effects of negative impact on the public realm that can be caused by SPIL sites is mitigated by P12 (Design of Places) and P17 (Efficient use of Land). It is imperative that surrounding public realm is designed around the highest levels of natural surveillance possible and that neighbouring use classes are strategically selected.
- Thirdly, the varied activities that take place on SPIL sites have an uncertain relationship with the IIAO to reduce carbon emissions and tackle climate change depending on the business and operation on the site. The transportation of goods requiring vehicle emissions will have a direct negative impact on air quality in these areas. This will naturally be mitigated when cleaner transportation and technology are developed, however it is important that P64 (Improving air quality) is recognized for its value in mitigating the impacts of undesirable emissions on SPIL sites by monitoring air quality levels and particularly for vulnerable users such as the elderly and schools.
- In the case of Southwark, P28 (Strategic protected industrial land (SPIL)) does play a role in conserving historic environment and cultural assets. Some areas of Southwark were notably strategic industrial land that played a strong role on the people who have worked and lived in our borough in the past and up to present

time. The relationship with quality of landscape and townscape and conservation of historic environment is therefore uncertain and it is important that this policy exists (further detail can be found in the SPIL Background Paper).

- P28 (Strategic protected industrial land (SPIL)) SPIL can have negative effects on biodiversity and green infrastructure or corridors by presenting potential difficulties between connecting green links. This policy ensures that SPIL are limited and do not increase to places that have not historically been designated as SPIL. This protects biodiversity in former areas of protected industrial land that has been released for various reasons.
- P35 (Development outside town centres) has the potential to reduce the density in naturally-occurring town centres. This could cause an undesirable spread of intensity of development which contradict P17 (Efficient use of Land). Disruption of agglomeration benefits could have negative impact on other town centres nearby. Secondly, they could have physical, mental and emotional health impacts for residents and workers. Thirdly it could impact social inclusion and promote unsustainable forms of travel due to lower public transport accessibility levels (PTAL). These new town centres would require revised infrastructure planning and would be monitored through the use of impact assessment in considering a grant of planning permission on a case-by-case basis. Mitigation of this is required using an impact assessment which justifies this choice based on the sequential test. The sequential test is sufficient mitigation as it addresses the viability of new town centres based on criteria similar to the IIAO.
- In conclusion, SP4 policies have been positively prepared in relation to the sustainability objectives. Whilst certain elements of economic town centres may have negative or uncertain sustainability implications, such as development outside town centres and SPIL, they are effectively managed through policy to improve upon pre-existing condition. They therefore contribute more directly to sustainable development objective in the borough than the business-as-usual scenario.
- The new Use Class Order introducing Class E in September 2020 created some uncertainty regarding the delivery and monitoring of particular types of employment and retail development that is needed to meet the targets of the plan. In order to address the consequences which will arise from the introduction of Class E and in order to plan positively in a way that is consistent with and meets all the requirements of the NPPF, and achieves general conformity with the London Plan, the Council considers that it will be necessary in some cases to use conditions and/or planning obligations to put restriction on uses within new Class E development and this has been reflected in the main modifications for the employment and retail policies in the NSP. This will enable particular uses to be secured where there is an identified need, for example, light industrial uses in suitable locations and enables appropriate design of ground floors for this use.

## SP5. Thriving Neighborhoods and tackling inequalities

### Overall Summary: **Positive**

8.10 Strategic Policy 5: “Healthy active lives” and the development management policies that sit under it as a topic area (P44-P54) have been assessed as having an overall positive effect on the economic, social and environmental sustainability of the borough and the health and equality of residents, workers and visitors. Notably this includes:

- The delivery and increase in the range of jobs by supporting arts, culture, leisure and sports and health facilities, which can also positively effect wellbeing and mental health and provide opportunities for exercise, workshops, training classes and lessons. This will encourage social interaction and potentially employment prospects. These types of facilities, as well as community facilities can provide essential spaces for human interaction and discovery, reducing the chance of social exclusion. This is especially true for both the elderly, due to a lack of active friends or support networks, and children and younger people, where a lack of such facilities may have negative effects on their growth and their outlook on life.
- Arts, culture and leisure can extend our evening economies, adding life and vitality to places for a longer time each day, making people feel safer. Flexible, shared community facilities were assessed as a positive policy development due to the increased opportunities for social interaction across groups, and more people using spaces and buildings at different times of day, helping to create street life and enhancing natural surveillance. It will also be an efficient use of land in a borough where land is in extremely short supply.
- Promoting walking, cycling and public transport over private car use will similarly have multiple positive impacts. Well designed and easy-to-navigate routes will increase and improve access to services, facilities and jobs for residents and visitors and improve safety by reducing car accidents through integrating appropriate well designed infrastructure. Walking and cycling are the healthiest ways to move around and encouraging this will help make people and places healthier, more active and have improved air quality and reduce emissions. Opening up low line walking routes along and through the borough’s railway viaducts will re-connect historically severed areas and provide space for and further improve access to a variety of businesses, services and facilities and encourage walking.
- Investment in public transport infrastructure and discouraging the use of private motor vehicles will reduce negative environmental impacts, including CO<sup>2</sup> emissions and air quality impacts. Car parking provision will be more restrictive than previous policy limits and the current London Plan, potentially impacting families more so than other groups where cars are seen as the most convenient mode of transport. However, we are increasing accessibility through the promotion of walking with good walking routes that make it easy for people with

mobility issues to move around, as well as requiring cycle parking spaces for accessible bicycles and tricycles. Street level car parking will also be restricted.

- No negative sustainability implications have been identified as part of the appraisal of SP5 and underlying development management policies. Instead it is considered that the promotion of sustainable modes of transport supports each of the IIA objectives directly or indirectly and is positively prepared.

## **SP6. Climate Emergency**

### **Overall Summary: Positive**

8.11 Strategic Policy 6: “Climate Emergency” and the development management policies that sit under it as a topic area (P55-69) have been assessed as having an overall positive impact on the economic, social and environmental sustainability of the borough and the health and equalities of residents, workers and visitors. Notably this includes:

- SP6 sets out a suite of environmental policies to adapt to and mitigate against climate change. This sets out the strategy to the management and protection of the natural environment in Southwark to ensure that trees, open space and biodiversity are protected and enhanced, and that environmental quality is not compromised by noise, contaminated land or waste. Each environmental policy adapts and/ or mitigates to climate change by managing resources in a more sustainable way to address the climate emergency and contribute to meeting the statutory net carbon zero target by 2050.
- The continued protection of currently protected green space and the creation of new green and open spaces will have multiple benefits, including providing new and improving existing habitats which will enhance the borough’s biodiversity. Access to nature and greenery is known to have positive effects on mental wellbeing. Open and green spaces will also provide the opportunity for people to engage in leisure, sports and recreational activities which are often a good form of exercise. This will improve the health of the population in Southwark.
- Improving Southwark’s existing poor air quality has the potential to significantly improve physical health, particularly for vulnerable groups such as children and the elderly, who suffer the effects of poor air quality more so than other groups. Plants absorb carbon dioxide and release oxygen, meaning the more greenery Southwark has, through green walls and roofs, brown roofs, green open space, community food growing facilities and green open spaces such as parks and gardens the better the opportunity for improvement. The air quality neutral policy has been supplemented with a requirement to provide measures beyond air quality neutral which should offset a development’s impact. This is considered to be a best-fit compromise between the need to improve air quality and also deliver homes and employment space.
- While lots of types of trees can actively improve air quality, some types of trees can cause new harmful pollutants to form which would not otherwise have

formed. NSP policy directly addresses this risk. Another risk is the immediate urban context in which trees are planted needs to be carefully considered. For example, the canopy cover that trees provide can trap pollutants at ground level and prevent them from escaping, making air quality worse for users of the street. The NSP policy directly addresses this risk.

- Trees and other types of urban greening such as green walls and brown roofs will have positive impacts for other reasons, such as providing shade and minimising the solar gain of buildings, helping reduce overheating in buildings and the urban heat island effect. This will result in less need to artificially cool buildings, saving on energy consumption and CO2 emissions.
- Ensuring new buildings and existing buildings are built or retrofitted to high environmental standards will also save energy and reduce greenhouse gas emissions (P69). This will reduce utility bills, having a particularly positive effect in Southwark's deprived communities where fuel poverty is a higher risk for people. Retrofitting existing buildings and creating sustainable new buildings will contribute to future proofing our built environment, helping it to be 'fit for purpose' for longer and resulting in a more efficient use of resources such as materials and energy. Other policies that will help to achieve an efficient use of resources include our energy policy, where combined heat and power will re-capture wasted heat energy to supply back to buildings; requirements for re-use of rain water; and requirements for construction phases to demonstrate sustainable waste management.
- Public safety will be positively impacted through improving green spaces for pedestrians and cyclists so that they can avoid main roads where traffic accidents and poor air quality is worse. New development and public realm will be required to "design out" opportunities for crime and reduce flood risk through design and mitigation measures. The appropriate management of waste will also help to positively impact health and safety of the public realm, minimising vermin and offensive odours and visual harm to amenity.
- No negative sustainability implications have been identified as part of the appraisal of SP6 and underlying development management policies. Instead it is considered that the promotion of environmental policies supports each of the IIA objectives or indirectly and is positively prepared.
- SP6 Climate Emergency and the associated development management policies collectively, alongside other policies in the plan, adapt to and mitigate against climate change to reduce carbon emission in new development and the built and natural environment to aim to meet net carbon zero targets. This includes meeting net carbon zero by 2050 and the interim target as set by the Carbon Budget Order (2021) to 78% carbon reduction against 1990 baseline levels by 2035.

## **Conclusion**

8.12 The overall impact of the eight identified strategic policies and the associated development management policies in terms of the seventeen objectives in the IIA

framework (Appendix 4) have been assessed and are all positively prepared. Risks that have been identified are generally mitigated by other policies in the plan.

## 9 Appraisal Summary for NSP Area Visions and Site Allocations

- 9.1 As set out earlier in the report, within the IIA submitted in January 2020 with the New Southwark Plan Submission Version, the site allocations had been grouped together with their respective site area visions. The Inspectors have indicated that this approach did not allow the consideration of an individual site's performance against the Council's appraisal objectives nor it enabled the consideration of any potential mitigation measures required.
- 9.2 The IIA has now been updated with the site appraisal for each individual site allocation against the IIA objectives and this is set out in Appendix 5. A summary of the sustainability appraisal for both area visions and site allocations is set out further below.
- 9.3 The area visions and site allocations are assessed with explicit reference to the short, medium and long term impacts of the designations. These are assessed against the 17 IIA objectives. This is considered appropriate due to acknowledging that the temporal impacts, including those from the implementation of policies alongside the area visions and site allocations, will be experienced to varying degrees in each area, i.e. spatially. Further information about impact of the policies is set out below. The area visions are:
- Aylesbury
  - Bankside and the Borough
  - Bermondsey
  - Blackfriars Road
  - Camberwell
  - Crystal Palace and Gipsy Hil
  - Dulwich
  - East Dulwich
  - Elephant and Castle
  - Herne Hill and North Dulwich
  - London Bridge
  - Nunhead
  - Old Kent Road
  - Peckham
  - Rotherhithe
  - Walworth
- 9.4 Chapter six of this report sets out the IIA Appraisal Methodology on the basis of which the sustainability appraisal was carried out. As set out in Tables 5.3 and 5.4, each objective is measured on a scoring scale, with each grade assigned a numeric value, symbol and colour. The colour bar within Table 5.4 divides the overall scoring into three categories from negative (< 10 %), neutral (10 - 49%) and positive (50 - 100%).

## Area Visions and Site Allocations

- 9.5 The table below shows the averaged scoring for the area vision appraisals across all time periods, to indicate the overall efficacy in meeting the sustainability objectives.

Site	Area vision appraisal across all time periods
Aylesbury	62%
Bankside and borough	47%
Bermondsey	50%
Blackfriars Road	56%
Camberwell	53%
Crystal Palace and Gipsy Hill	38%
Dulwich	47%
East Dulwich	47%
Elephant and Castle	50%
Herne Hill and North Dulwich	35%
London Bridge	57%
Nunhead	38%
Old Kent Road	69%
Peckham	59%
Rotherhithe	65%
Walworth	50%

- 9.6 To note, the scale for the appraisals is the same however the color coding is different. It is clear that anything above the score of 10% is neutral whereas anything above 50% is positive. For that reason most of the short and medium-term impacts will be assessed as neutral, as the amount of change that will happen to these areas as a result of site allocations and area visions will take time to take effect. In no circumstance under the site appraisal process has an impact of a site or area action plan been negative and for this reason there are no negative results identified. Instead the appraisal differentiates by area based on the time-sensitive effectiveness of these visions.
- 9.7 Social inclusion was recognized as a short term issue in Blackfriars Road, Camberwell, Elephant and Castle, Peckham, Rotherhithe and Walworth. This is due to a concentration of short-term redevelopment, where it will take time before improvements to the public realm and accessibility enhancements are realized. For this reason, in the short-term while redevelopment is occurring it is likely that elements of social inclusion, equality and diversity are reduced due to the difficulty in accessing sites that are under construction with not enough mitigation in place. Policy ensures that once development is completed, that public realm is enhanced.
- 9.8 The contribution to climate change was uncertain in the short-term for Bankside and the Borough, Blackfriars Road, Camberwell, Elephant and Castle, London Bridge and Rotherhithe. The reason for the short-term uncertainties are because at present these areas suffer from particularly poor air quality and high carbon dioxide emissions with high levels of motorized private or public transport. Development intends to encourage

a modal switch towards walking and cycling in all these areas but at present there is uncertainty as to whether these will be effective in the short-term.

- 9.9 A negative contribution to climate change and uncertain sustainable use of water resources is identified in the Old Kent Road, which is subject to experience a particularly high level of growth in the short-term which will lead to an immediate demand on resources. Strategies to develop utilities, energy, flood risk and water management to inform policies in the AAP have been developed in order to mitigate the overwhelming amount of growth anticipated on social, economic and environmental sustainability benefits. New underground stations and improved surface transport suggests that the health of the population and more sustainable modes of travel are expected. Overall the benefits of the regeneration, designated as an opportunity area in the London Plan outweighs any of these negative short term costs. The focus will be to ensure that the infrastructure is in place to mitigate negative impact in the long run.
- 9.10 The site allocations and area vision impacts will be more prominent in their effect on sustainability in the sites marked as green than the sites marked as yellow. The overall impact of the site allocations and area visions are positive with eight of the area visions containing site allocations all scoring above 50 and scoring notably highly in area visions; Borough and Bankside, Bermonsdey, Dulwich Herne Hill, Elephant and Castle, London Bridge, Old Kent Road and Walworth. It is important to note that Nunhead Area Visions do not contain any site allocations.
- 9.11 The sustainability appraisal of the site allocations demonstrate that most of the sites will be positively contributing to the housing stock within these areas by providing housing of various tenures (objective 15) including affordable housing, encouraging more activity within retail centres, through the provision of various town centre uses which helps to stimulate the economy and sites will at least be re-providing or delivering an uplift of employment in commercial uses specifically office use which will also help to encourage wealth and creation within the borough (objective 1).
- 9.12 The site allocations also score highly in promoting active modes of transport (objective 16), through providing green links to open spaces and supporting the low line walking route, this in turn has positive effects on climate change (objective 6) and air quality (objective 7) where the use of more active modes of transport such as cycling and walking will naturally reduce carbon emissions from private vehicles, as cars and motorcycles are used less often. Beneficial outcomes from encouraging more active modes of transport also positively contribute to improving health within the borough (objective 3) through encouraging residents to partake in more physical activity.
- 9.13 Most of the sites allocations also score highly in contributing to increasing the provision of infrastructure (objective 17) to support new development. This is mainly being done through enabling the provision for community and assembly and leisure facilities. New development within the area visions will also be subject to community infrastructure payments and the necessary s106 payments which will deliver the required infrastructure to mitigate impact of the development. This in turn will help in creating community interaction and cohesion (objective 5) where residents and visitors are able to participate and have access to a wide range of community cultural and leisure facilities together. The sustainability appraisal of the site allocations also demonstrates that the sites also contribute towards creating a safer Borough (objective 4) in encouraging more natural surveillance within the area through active frontages, more walking and cycling routes and generally increasing the population within the

Borough through providing more housing which would naturally result in more people coming into the area and using local essential facilities. This also increases the perception of a safer environment amongst residents as more people will be moving within the Borough which aids in creating natural surveillance.

### **Flood Risk of Site Allocations**

9.14 The borough is at risk of flooding from a number of sources including from the River Thames as well as from ground and surface water flooding. The Inspectors have pointed out that no evidence was provided that a sequential, risk based approach to the location of development as required by paragraph 157 of the Framework has been carried out. Within the sustainability appraisals set out in Appendix 5, Objective 14 details how the sequential test (and exception test if required) has been applied with further analysis for each site allocation.

9.15 The next section within this chapter sets out the NPPF approach to flood risk management in the preparation of a local plan; and further information on the sequential and exceptions tests. This section further elaborates on the Council's approach to flooding and an appraisal summary for site allocations sequential and exception tests.

#### NPPF approach to flood risk management in the preparation of a local plan

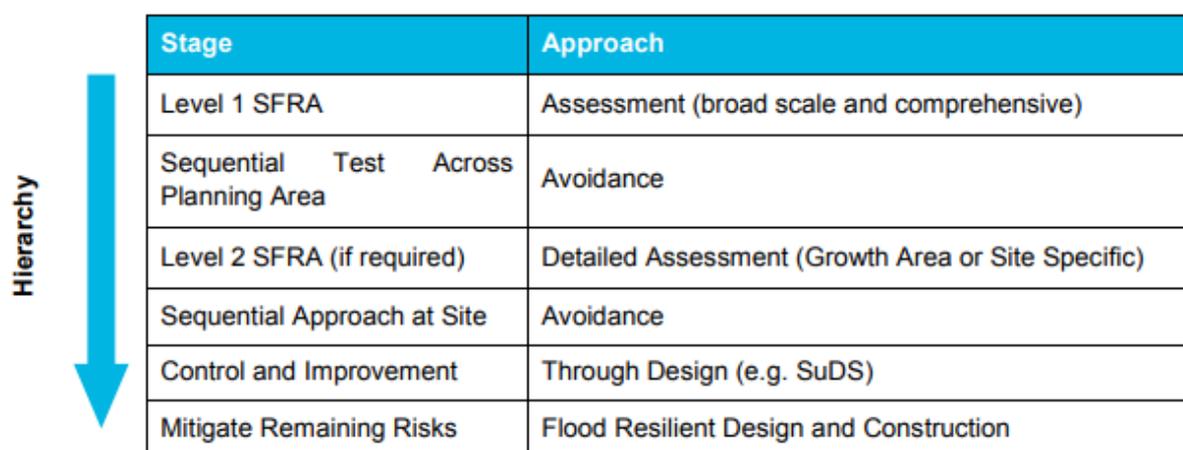
9.16 The National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance emphasise the responsibility of Local Planning Authorities to ensure that flood risk is understood and managed effectively and sustainably throughout all stages of the planning process.

9.17 The greatest risk to property and life from flooding within Southwark is as a result of tidal activity within the River Thames. However, the Borough is currently protected from combined tidal and fluvial flooding by the River Thames Tidal Defences, up to the 1 in 1000 year event. The risk is therefore of a residual nature, associated with overtopping or breaching of defences. Excepting the River Thames, there are no other watercourses within Southwark known to present a risk of fluvial flooding. A potential risk of flooding from other (non-river related) sources exists throughout the Borough, including sewer surcharge and surface water flooding as a result of heavy rainfall and/or blocked drainage systems.

9.18 Southwark plays a key role in managing this risk as a Lead Local Flood Authority, under the Flood and Water Management Act (2010) and the Flood Risk Regulations (2009). Areas of the Borough are also thought to be susceptible to elevated groundwater levels, which may additionally interact with and exacerbate these other sources of flood risk. It is expected that changing climate patterns will have a substantial impact on the level of flood risk from all sources within Southwark.

9.19 The NPPF approach aims to ensure that flood risk is considered at all stages of the planning process and to avoid inappropriate development in areas of greatest flood risk; steering development towards areas of lower risk. Development is only permissible in areas at risk of flooding in exceptional circumstances where it can be demonstrated that there are no reasonably available sites in areas of lower risk, the sustainability benefits of that development outweigh the risks from flooding and, the development will be safe for its lifetime without increasing flood risk elsewhere.

9.20 Such development is required to include mitigation/management measures to minimise risk to life and property should flooding occur. Building on these principles, the NPPF and Technical Guidance have established a process for the assessment of flood risk, with each stage building upon the previous assessment with a refinement of the evidence base. Utilising a Source – Pathway – Receptor approach, the source of flooding, the spatial distribution of flood risk and the vulnerability of development types are assessed to inform decision making through each of the key stages of the Flood Risk Management Hierarchy, as outlined in the NPPG and shown in the table below.



Stage	Approach
Level 1 SFRA	Assessment (broad scale and comprehensive)
Sequential Test Across Planning Area	Avoidance
Level 2 SFRA (if required)	Detailed Assessment (Growth Area or Site Specific)
Sequential Approach at Site	Avoidance
Control and Improvement	Through Design (e.g. SuDS)
Mitigate Remaining Risks	Flood Resilient Design and Construction

#### Applying the sequential test

9.21 The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. (paragraph 158 of the NPPF). As such, development should not be permitted in areas of flood risk, where there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.

9.22 Planning Practice Guidance requires inappropriate development in areas at risk of flooding (i.e. in flood zones 2 and 3 or land within flood zone 1 which has critical drainage problems) to be avoided by directing development away from areas at highest risk. Where development is necessary, it is required that it is made safe without increasing the risk of flooding elsewhere. The NPPF sets out a sequential approach in order to achieve this. This requires that development can be located in flood zone 2 and then flood zone 3 only if there are no reasonably available sites in flood zone 1. The Sequential Test should be carried out on all development sites and can be applied at all levels and scales of the planning process, both between and within Flood Zones.

9.23 The approach seeks to prevent the allocation of sites that are inappropriate on flood risk grounds by considering the vulnerability of the type of development proposed and how compatible the intended use is with the level of flood risk at the site. The NPPF Technical Guidance Note classifies the flood risk vulnerability of land uses into five categories, as follows:

#### **1) Flood risk vulnerability of land uses**

##### **i. Essential infrastructure**

Includes:

- Essential transport infrastructure;
- Essential utility infrastructure including electricity generating power stations, water treatment works;
- Wind turbines.

## **ii. Highly vulnerable**

Includes:

- Police stations, fire stations and ambulance stations;
- Emergency dispersal points;
- Basement dwellings;
- Caravans, mobile homes and park homes intended for permanent residential use;
- Installations requiring hazardous substances consent.

## **iii. More vulnerable**

Includes:

- Hospitals;
- Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels;
- Buildings used for dwelling houses, student halls of residence, drinking establishment, nightclubs and hotels;
- Non-residential uses for health services, nurseries and educational establishments;
- Landfill and sites used for waste management facilities for hazardous waste;
- Sites used for holiday or short-let caravans and camping.

## **iv. Less vulnerable**

Includes:

- Police, ambulance and fire stations which are not required to be operational during flooding;
- Buildings used for shops; financial, professional and other services; restaurants and cafes; hot food takeaways; offices; general industry; storage and distribution; non-residential institutions not included in 'more vulnerable', and assembly and leisure;
- Land and buildings used for agriculture and forestry;
- Waste treatment;
- Minerals working and processing;
- Water treatment works;
- Sewage treatment works.

## **v. Water-compatible development**

Includes:

- Flood control infrastructure;
- Water transmission infrastructure and pumping stations;
- Sewage transmission infrastructure and pumping stations;
- Sand and gravel workings;
- Docks, marinas and wharves;
- Navigation facilities;
- MOD defence installations;
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location;
- Water-based recreation (excluding sleeping accommodation);
- Lifeguard and coastguard stations;

- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation; and
- Essential facilities such as changing rooms; essential ancillary sleeping or residential accommodation for staff required by uses in this category.

9.24 The below table sets out the types of development that are considered as suitable within areas of varying perceived flood risk.

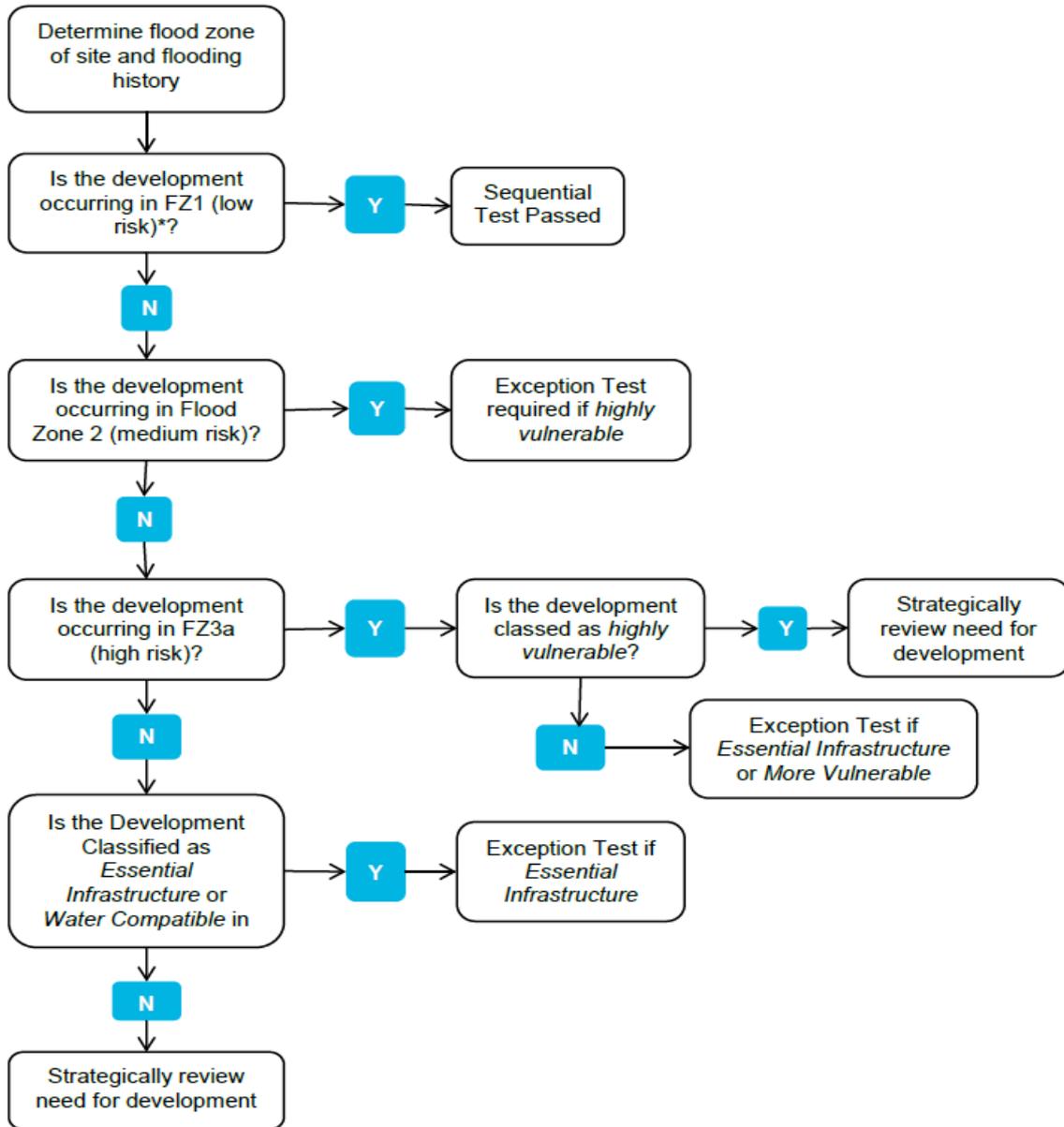
## 2) Flood zones and development compatibility

Flood Zone	Description	Annual probability of river or sea flooding	Appropriate uses
Zone 1	Low Probability	1 in 1,000 (<0.1%)	<ul style="list-style-type: none"> <li>• All uses</li> </ul>
Zone 2	Medium Probability	1 in 100 – 1 in 1,000 (river) (1-0.1%) 1 in 200 – 1 in 1,000 (sea) (0.5-0.1%)	<ul style="list-style-type: none"> <li>• Water Compatible</li> <li>• Less Vulnerable</li> <li>• More Vulnerable</li> <li>• Essential Infrastructure</li> <li>• Highly Vulnerable*</li> </ul>
Zone 3a	High Probability	1 in 100 or greater (river) (>1%) 1 in 200 or greater (sea) (>0.5%)	<ul style="list-style-type: none"> <li>• Water Compatible</li> <li>• Less Vulnerable</li> <li>• More Vulnerable*</li> <li>• Essential Infrastructure*</li> </ul>
Zone 3b	The Functional Floodplain	1 in 20 or greater (5%) or land which is designed to flood in an extreme (0.1%) flood.	<ul style="list-style-type: none"> <li>• Water Compatible</li> <li>• Essential Infrastructure*</li> </ul>

Notes: \*only if Exception Test passed

### The Sequential Test

9.25 There is significant development and regeneration proposed in Southwark in the future, with a large number of site allocations located in medium-to-high risk flood zones 2 or 3. As such it is crucial that the allocation of development considers flood risk early in the planning process. It is therefore necessary for Southwark to consider whether potential development sites in flood zones need to and can pass the sequential and exception test. Within the *Strategic Flood Risk Assessment (SFRA) Level 1 (2017)* it is set out how the Sequential Test has been undertaken and how the below flow diagram has been applied to identify the suitability of a site for allocation, in relation to the flood risk classification.



\* Other sources of flooding also need to be considered

- 9.26 Southwark is an inner London borough with a large proportion of land located in flood zone 2 and 3; therefore locating all required development in the Borough away from these areas is unlikely to be achievable. In order to effectively manage flood risk, a sequential test has been applied for each site allocation in the *Strategic Flood Risk Assessment (SFRA) Level II: Sequential test of site allocations* according to the NPPF risk-based approach. The test confirms if the proposed land use is acceptable and compatible with the flood risk zone or requires an additional exception test to allow the development to occur for wider sustainability reasons (paragraph 159 of the NPPF).
- 9.27 The greatest risk to property and life from flooding within London Borough of Southwark (LBS) is as a result of tidal activity within the River Thames. However, the Borough is currently protected from combined tidal and fluvial flooding by the River Thames Tidal Defences (TTD) up to the 1 in 1000 year event. The risk is therefore of a

residual nature, associated with overtopping or breaching of defences. Excepting the River Thames, there are no other watercourses within Southwark known to present a risk of fluvial flooding.

- 9.28 A potential risk of flooding from other (non-river related) sources exists throughout the Borough, including sewer surcharge and surface water flooding as a result of heavy rainfall and/or blocked drainage systems. Southwark plays a key role in managing this risk as a Lead Local Flood Authority, under the Flood and Water Management Act (2010) and the Flood Risk Regulations (2009).
- 9.29 Areas of the Borough are also thought to be susceptible to elevated groundwater levels, which may additionally interact with and exacerbate these sources of flood risk. It is expected that changing climate patterns will have a substantial impact on the level of flood risk from all sources within Southwark.
- 9.30 The SFRA identifies the tidal floodplains associated with the River Thames and presents Flood Zone Maps that delineate the flood zones outlined in the NPPF. Breach modelling has additionally been undertaken to enable a greater understanding of the residual risk associated with this source. The resulting hazard, depth and velocity mapping contained within the SFRA provide further definition of the spatial variations of flood risk within Flood Zone 3.
- 9.31 The majority of the northern half of the Borough is located within Flood Zone 3a and therefore classed as at high risk of flooding. The floodplain areas within Southwark associated with the River Thames do not have a Flood Zone 3b or functional floodplain associated with them, as they are classed as defended and would not flood during a 1 in 20 year event. Therefore, the functional floodplain has been defined as the area situated on the river side of the raised defence line.
- 9.32 Many site allocations are located in the four opportunity areas designated for significant growth in the London Plan (Canada Water, Borough, Bankside and London Bridge, Elephant and Castle and Old Kent Road). Many of the sites in the north of the borough are required to deliver the quantum of housing necessary to meet the borough needs, as well as the development of employment and retail floorspace, particularly in the Central Activities Zone (north of the borough). Additional social infrastructure and new parks will also be delivered as part of the regeneration objectives of these areas. The development of these areas, in conformity with the London Plan objectives for growth and housing targets, is considered to bring significant sustainability benefits to the local communities.
- 9.33 The development envisaged for these areas to meet the requirements of meeting the boroughs targets for growth, the duty to cooperate with neighbouring boroughs (for example to secure significant infrastructure improvements such as the Bakerloo Line extension) and the Opportunity Area designations for growth in the London Plan. The scale of development envisaged for these areas is unlikely to be achievable in other parts of the borough and would not meet other sustainability objectives of the IIA. Whilst many of the sites are located in Flood Zone 3, these benefit from the Thames Tideway defences, and many safety measures are incorporated into NSP Policy P67 to ensure the developments are safe. The sequential test for the site allocations is therefore considered to be passed.

## The Exception Test

9.34 A local planning authority should demonstrate through evidence that it has considered a range of options in the site allocation process, using the Strategic Flood Risk Assessment to apply the Sequential Test and the Exception Test where necessary. This can be undertaken directly or, ideally, as part of the sustainability appraisal. Where other sustainability criteria outweigh flood risk issues, the decision making process should be transparent with reasoned justifications for any decision to allocate land in areas at high flood risk in the sustainability appraisal report.

9.35 Appendix 5 contains a detailed sustainability appraisal, where every area vision and site allocation was assessed against the Council's objectives. For every site allocation under objective 14 (To reduce vulnerability to flooding) it is set out whether it has satisfied the sequential test, or an exception test was required. As set out in SFRA Level II, if the sequential test is passed, the development is permitted as it proposes 'less vulnerable' land uses which are acceptable within the respective Flood Zone. If the sequential test confirms that the site will have 'more vulnerable' land uses, an exception test has been carried out to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. Within the exception test two criterion need to be satisfied, as per paragraph 160 of the NPPF as follows:

**1. Demonstrate wider sustainability benefits to the community that outweigh flood risk**

*Evidence of wider sustainability benefits to the community should be provided, for instance, through the sustainability appraisal. If a potential site allocation fails to score positively against the aims and objectives of the sustainability appraisal, or is not otherwise capable of demonstrating sustainability benefits, the local planning authority should consider whether the use of planning conditions and/or planning obligations could make it do so. Where this is not possible the Exception Test has not been satisfied and the allocation should not be made.*

**2. Demonstrate that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall**

*Wider safety issues need to be considered as part of the plan preparation. If infrastructure fails then people may not be able to stay in their homes. Flood warnings and evacuation issues therefore need to be considered in design and layout of planned developments. In considering an allocation in a Local Plan a level 2 Strategic Flood Risk Assessment should inform consideration of the second part of the Exception Test.*

9.36 Where an exception test was required, to satisfy the sequential test criterion, under objective 14 we have set out the wider sustainability benefits for each site allocation in Appendix 5 such as social, economic and environmental benefits that would be brought to the community that outweigh flood risk.

9.37 Many site allocations are located in the four opportunity areas designated for significant growth in the London Plan (Canada Water, Borough, Bankside and London Bridge, Elephant and Castle and Old Kent Road). Many of the sites in the north of the

borough are required to deliver the quantum of housing necessary to meet the borough needs, as well as the development of employment and retail floorspace, particularly in the Central Activities Zone (north of the borough). Additional social infrastructure and new parks will also be delivered as part of the regeneration objectives of these areas. The development of these areas, in conformity with the London Plan objectives for growth and housing targets, is considered to bring significant sustainability benefits to the local communities. The following regeneration benefits are relevant:

- Making use of brownfield sites;
- New homes to meet and exceed our housing targets including affordable housing to meet the borough needs of social rented and intermediate housing
- An increase in high-quality office accommodation to support the growth of the local economy and bring increased job opportunities and prosperity to the borough including the provision of affordable workspace;
- A variety of town centre uses and retail at ground floor level to provide active frontages and create a vibrant urban area;
- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development;
- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant;
- Delivery of the Low Line walking route creating improved accessibility and the quality of experience for walking. Improved walking networks encourage active travel and exercise, which is beneficial for health, as well as activating railway arches for a variety of commercial uses;
- Bringing more destinations closer to residents through strategic walking routes and improved accessibility, with improved pavements, crossings and public spaces encourage people to walk more. Measures to encourage walking can also help tackle social isolation and routes should accommodate parents and older or disabled people;
- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.
- New homes will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health;
- Some sites are required to deliver new open space in areas of deficiency. New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialisation, nature conservation, food growing and cultural events. This will maintain and improve open spaces to ensure health and wellbeing benefits associated with these activities are accrued;
- The provision of open space is valuable in supporting active travel and walking which has the potential to encourage a reduction in climate change. By reducing the intensity of carbon emissions released in a certain area contributes to better air quality;

- The increased provision of open space will help absorb negative CO2 emissions and this will contribute to better air quality;
- The requirement to improve pedestrian movement and permeability through site developments will enhance connectivity across the area, promoting healthy lifestyles and improving access to services.
- Redevelopment opportunities will also enable social infrastructure such as schools and health facilities to be provided.

These sites are therefore considered to pass part 1 of the Exceptions Test.

- 9.38 Furthermore, to meet the second requirement that the development is safe for its lifetime, and that flood risk to people and property will be managed satisfactorily, recommendations set out in the SFRA Level II report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS have been incorporated under objective 14 in Appendix 5 for each site. The site allocations in Flood Zone 3 are in the 'defended' zone, meaning they benefit from protection from combined tidal and fluvial flooding by the River Thames Tidal Defences (TTD) up to the 1 in 1000 year event. The risk is therefore of a residual nature, associated with overtopping or breaching of defences.
- 9.39 Ongoing maintenance of these defences is critical, and the SFRA recommends priority should be given to safeguarding the Standard of Protection (SoP) provided by defences over the lifetime of any development. Additionally, the SFRA recommends consideration should be given to the specific recommendations of the Environment Agency's Thames Estuary 2100 (TE2100) plan in requiring reduction of current and future flood risk through raising, maintaining and enhancing flood defences.
- 9.40 Policy P67 in the New Southwark Plan requires a number of measures in developments to promote safety measures which would apply to all site allocations:
- Finished floor levels set no lower than 300mm above the predicted maximum water level
  - Reducing surface water run-off to greenfield run-off rates including the use of SUDS to the drainage hierarchy and water sensitive urban design
  - Permeable paving and gardens
  - A set back of 10 metres for development on sites located adjacent to the River Thames defence wall
- 9.41 A Flood Risk Assessment (FRA) would also be required for any development proposals in flood risk zones 2 and 3. The FRA must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, include site specific measures to, reduce flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas, as recommended in the Level 1 SFRA.
- 9.42 Where an approved application is relevant to a site allocation, further information has been provided under objective 14 to set out the flood risk considerations that were taken into account during the decision making process, and what recommendations have been made to reduce flood risk and making the development safe for its lifetime. The SFRA also recommended using Integrated Water Management Strategies (IWMS)

for areas which would receive a significant amount of development to manage surface water run-off on a strategic scale. An IWMS has been prepared for the Old Kent Road AAP incorporating these principles. Overall, the site allocations requiring the exceptions test are considered to be able to demonstrate the development will be safe, protecting the vulnerability of its users, and without increasing flood risk elsewhere by using the principles of Policy P67, Integrated Water Management Strategies and individual Flood Risk Assessments, in accordance with Part 2 of the Exceptions Test.

- 9.43 The sustainability appraisal of objective 14 (in Appendix 5) was undertaken using professional judgment, supported by the baseline information and wider evidence base. Out of 82 sites, all sites have passed the sequential test. A number of sites also required additional exception tests. All sites required for the exception test have satisfied the two criteria of the exception test. None of the site allocations represented inappropriate development which is incompatible with the flood risk level as defined in the NPPF.
- 9.44 As such, overall the sustainability appraisal of each site demonstrates a positive appraisal. No risks have been identified as part of the site appraisals and if any arose at a later time, they are generally mitigated by other policies in the plan.

## 10 Appraisal Summary for NSP Implementation Policies

10.1 The IIA appraisal tables in Appendix 7 set out the details of the impacts for of the six implementation policies in terms of the seventeen objectives in the IIA framework.

### **IP1. Infrastructure**

**Overall Summary:** Positive

10.2 Overall this policy is positively prepared. The only item to note is all aspects of infrastructure are supported by these two implementation policies, there is potential for clashing incentives, for instance between sustainable urban drainage systems and green infrastructure with highways and public transport infrastructure. For this reason IIOA9 and IIAO14 are uncertain as to whether they are actively seeking to achieve these objectives, although they are included in the infrastructure policy, benefits provided might be minimised by other infrastructure capacities supported by this policy.

### **IP2. Transport Infrastructure**

**Overall Summary:** Positive

10.3 Overall this policy is positively prepared as it encourages improvements to transport infrastructure which should reduce unsustainable transport usage and support more environmentally-friendly modes of travel. Secondly, improved transport systems will allow more people the opportunity to travel, potentially improving their quality of life.

### **IP3. Community Infrastructure levy (CIL) and Section 106 planning obligations**

**Overall Summary:** Positive

10.4 This policy is positively prepared as it ensures that principles of sustainable development can be mitigated through financial contributions, allowing development to support sustainable functioning in the local community and for surrounding neighbourhoods whether or not they are able to achieve it in their design.

### **IP4. Enforcement against unlawful development**

**Overall Summary:** Positive

10.5 This policy ensures that the objectives of the council are met by discouraging development to take place that does not conform to the sustainable principles promoted by the NSP, where not adhering to these policies present risk of adverse harm to the borough and its residents. Regulating the development that takes place unlawfully ensures that the wellbeing of residents can be protected and impact of the development can be mitigated if adverse harm is created. This ensures that development takes place which optimises benefits for all members of the community.

## **IP5. Compulsory Purchase Order (CPO)**

**Overall Summary:** Positive

10.6 This policy provides purchasing rights to the Council to support wider regeneration objectives. It requires power to be given to the Council to strategically select land that can be seen to provide long-term social, environmental and economic benefits to the overall wellbeing of its residents. This is justified if the Council is able to provide a compelling case in the public interest. Such a case requires a long-term vision into the future, and the cooperation of a number of stakeholders and funding provisions to be provided. In the short-term, claiming land in this way can be disruptive to communities. It is however a requirement of national legislation. Although the methods of acquiring land through Compulsory Purchase Order (CPO) are often criticised, there are examples showing where these have been of an overall benefit to wider communities in the long-term. The Council provides multiple forms of support to property owners and residents who are at risk of being displaced by the CPO process, including the provision of compensation. CPO remains the last resort for the Council in securing vacant possession of land for regeneration.

## **IP6. Monitoring Development**

**Overall Summary:** Positive

10.7 Monitoring development is an ongoing requirement of the Council done through its Authority Monitoring Report, which is discussed below. The AMR procedure ensures that fundamental Council data is publicised and made transparent, so that the Council is able to adjust planning policies at interim reviews. This provides a fundamental feedback mechanism that enables planning policies to be improved upon on a regular basis. It has numerous indirect benefits for these reasons. The Main Modifications to the NSP include the introduction of the NSP Monitoring Framework to the plan which provides clarity on the indicators and how each policy will be monitored over the plan period. Overall, the appraisal is positive as it is clearer how the plan will be monitored over time.

## **IP7. Statement of Community Involvement**

**Overall Summary:** Positive

10.8 The SCI supports all stakeholders and interested parties to the planning policies to provide comments and recommendations regarding all planning documents and guidance. It ensures that sufficient community engagement takes place to specifically target harder to reach groups, who may be affected by planning policy, however are unaware of the process behind providing comments. The intention of the SCI is to improve equality and incorporate the benefits of a wider range of stakeholders in the borough to develop the most effective and beneficial planning policies and supplementary guidance.

## **Conclusion**

10.9 While there is room for improvement in IP5 the remainder of the Implementation Policies are positively prepared and therefore recommended.

## 11 Monitoring and Implementation of the NSP

### Proposals for monitoring

- 11.1 This plan will be monitored through the NSP Monitoring Framework (Annex 4 to the plan). They have drawn on and provide more detail to the baseline indicators found in Appendix 9 of this report which refer to findings of Appendix 3: Baseline Data. Each of the baseline indicators are attributed to specific IAOs which have been used during the appraisals of the NSP (Appendix 5, 6 and 7).
- 11.2 The most appropriate way to monitor the plan is through the Local Development Framework Authority's Monitoring Report (AMR). The AMR monitors the type of development that is occurring as a result of all of the council's planning policies and guidance and what effects this development is having in terms of sustainability. The effectiveness of the policies will be monitored through the NSP Monitoring Framework.
- 11.3 The indicators will also be monitored through publication of Social Regeneration Indicators published alongside the Council Plan. These indicators will be reported to Cabinet on an annual basis so they can monitor the progress of the indicators. Social Regeneration Charters will be updated in response to the annual analysis of the Social Regeneration Indicators to ensure that the charter goals and promises remain up to date.
- 11.4 The sources of monitoring for all indicators can be found in Appendix 9 and in the NSP Monitoring Framework.
- 11.5 Updates to Policy IP6 in the Main Modifications include requiring applicants and developers to provide data about their development in a digital format and standard that we need to successfully monitor it. It also refers to the NSP Monitoring Framework (Annex 4 of the plan) which explains how we will collect and publish data and work towards a new monitoring system.
- 11.6 In relation to the future digital monitoring tool potential, the council has recently completed two digital discovery projects for its planning service that reviewed data management and service design processes within the planning division, and sets out next steps to deliver upgraded processes, including how we monitor our local plan.
- 11.7 The council aspires to make monitoring data focused and digitalised encouraging data to be submitted at application stage and monitored throughout the application process, through to decision and S106 sign off, and feeding through into LDD/the future London datahub (GLA project). Whilst this is an ongoing project, identifying the data indicators as we have done in the Monitoring Table is the first step in this process to ensure effective monitoring of the council's policies and reduce manual monitoring tasks for the team.
- 11.8 The council is committed to improving its approach to monitoring and making the information easily accessible, dynamically updated and linked to spatial mapping.

## **How will the plan be implemented?**

- 11.9 The plan will shape development in Southwark from 2019-2036 through the application of area vision guidance and strategic, development management and site allocation policies to planning proposals. As a spatial planning document it will also influence the investment decisions of the council and its development and infrastructure partners. We will ensure the NSP is implemented by working with the local community and businesses, developers, neighbouring borough councils, GLA, TFL and other partners to deliver the plan.
- 11.10 Southwark Council together with Lewisham will continue to actively campaign and promote the BLE given its importance for the delivery of homes in the boroughs. This infrastructure is essential to meet our housing target, given the planned delivery of new homes in the Old Kent Road Opportunity Area in Southwark and New Cross and Catford Opportunity Areas in Lewisham. Both parties will continue working with the Greater London Authority and Transport for London to develop these proposals for the BLE and to make the case to government to ensure the project is delivered.
- 11.11 Implementation of the NSP policies will be achieved through our development management function when we make decisions on planning applications. We will work with landowners and developers to ensure schemes make effective use of land across the borough and consider the wider context. We will use the council's delivery programmes to help deliver new council homes and using our compulsory purchase powers where necessary to ensure that land is made available for development where it is needed to deliver the NSP strategy.
- 11.12 Our Statement of Community Involvement (SCI) sets out how and when the community will be involved in preparing planning policy documents and in making decisions on planning applications. The SCI was developed by working with many local people, businesses, voluntary and community organisations, councillors and statutory organisations. The SCI includes: information on different consultation methods; how to overcome barriers to involve different groups and; the consultation process for both planning policy documents and planning applications. Involving the community at the earliest stage possible in the planning process helps to implement development that is wanted and needed by the community.
- 11.13 New development also needs to be supported by adequate social, physical and green infrastructure. This includes: social infrastructure such as schools, health and other community facilities; physical infrastructure such as transport and utilities; green infrastructure such as parks and open spaces. Where infrastructure is needed to support development, it should be provided along side it. Development should not be permitted unless essential infrastructure can be completed prior to occupation of the new development.
- 11.14 We will continue to work in partnership with infrastructure providers, including both internal council departments and external agencies, throughout the development of the NSP to identify infrastructure required to facilitate the development set out in the plan.
- 11.15 We will use S106 planning obligations/CIL to overcome negative impacts of development and to make sure that infrastructure needed to support development is provided. We will use planning obligations in accordance with government guidance, set out in the CIL Regulations. We have an approved Planning Obligations/CIL SPD

which explains our policies in more detail and sets out a series of standard charges to be applied to development. Through implementing this SPD and collecting CIL we will secure financial contributions to mitigate the impacts of development.

### **Links to other tiers of plans, programmes and other guidance**

- 11.16 The NSP will be continuously influenced by other tiers of planning at national, regional, borough and local levels. Any changes to other spheres of planning legislation will require the IIA and NSP to be updated accordingly to align with these new targets set.
- 11.17 The NPPF updates the approach to plan making by simplifying the process and returning to a system of Local Plans. We are preparing the Proposed changes to the Submitted New Southwark Plan to replace the Core Strategy and Saved Local Plan policies. The Local Development Scheme (available on our website) sets out the programme for the production of documents.
- 11.18 It should be noted that local planning policy is produced within a framework set by national and regional government planning guidance such as the NPPF and the London Plan. This guidance indicates the broad principles that local policy should adopt. For example, the London Plan identifies opportunity areas which are expected to deliver new homes, jobs and infrastructure to be determined in more detail in a local level plan.



# **Main Modifications to the New Southwark Plan**

## **Integrated Impact Assessment**

**Appendices  
1 – 13**

**(July 2021)**

## Appendix 1 – The SEA Directive Requirements

### The Strategic Environmental Assessment Regulations 2004 requirements checklist

Strategic Environmental Assessment Regulations requirements checklist	Plan-making stage
<p>Preparation of environmental report (regulation 12)</p> <p>Preparation of an environmental report that identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)).</p> <p>The report shall include such of the information referred to in Schedule 2 as may reasonably be required, taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3)). Information may be provided by reference to relevant information obtained at other levels of decision-making or through other EU legislation (regulation 12 (4)).</p> <p>When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be consulted.</p>	<p>Stages A-C as described in Figure 3.1 of the IIA.</p>
<p>The information referred to in Schedule 2 is:</p> <p>a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.</p>	<p>Stage A as described in Figure 3.1 of the IIA – Scoping stage.</p>
<p>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>	<p>Stage A as described in Figure 3.1 of the IIA - Scoping stage.</p>
<p>c) The environment characteristics of areas likely to be significantly affected.</p>	<p>Stage A as described in Figure 3.1 of the IIA - Scoping stage.</p>

d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 2009/147/EC (Conservation of Wild Birds) and 92/43/EEC (Habitats Directive).	Stage A as described in Figure 3.1 of the IIA - Scoping stage.
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Stages A-B as described in Figure 3.1 of the IIA.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	Stage B as described in Figure 3.1 of the IIA. (Section 5 of the IIA).
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Stages B-C as described in Figure 3.1 of the IIA. (Sections 5 and 6 of the IIA).
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Stages A-C as described in Figure 3.1 of the IIA. (Scoping and Sections 5 and 6 of the IIA).
i) A description of measures envisaged concerning monitoring in accordance with regulation 17.	Stages A-C as described in Figure 3.1 of the IIA. (Scoping and Section 10 of the IIA).
j) A non-technical summary of the information provided under the above headings.	Stage C as described in Figure 3.1 of the IIA. (Non-technical summary of the IIA).
Consultation procedures (regulation 13) As soon as reasonably practicable after their preparation, the draft plan or programme and environmental report shall be sent to the consultation bodies and brought to the attention of the public, who should be invited to express their opinion. The period within which opinions must be sent must be of such length as will ensure an	Stages A-D as described in Figure 3.1 of the IIA.

<p>effective opportunity to express their opinion.</p>	
<p>Information as to adoption of plan or programme (regulation 16)</p> <p>As soon as reasonably practicable after the plan or programme is adopted, the consultation bodies, the public and the Secretary of State (who will inform any other EU Member States consulted) shall be informed and the following made available:</p> <ul style="list-style-type: none"> <li>• the plan or programme adopted</li> <li>• the environmental report</li> <li>• a statement summarising: <ul style="list-style-type: none"> <li>(a) how environmental considerations have been integrated into the plan or programme;</li> <li>(b) how the environmental report has been taken into account;</li> <li>(c) how opinions expressed in response to: <ul style="list-style-type: none"> <li>(i) the invitation referred to in regulation 13(2)(d);</li> <li>(ii) action taken by the responsible authority in accordance with regulation 13(4),</li> </ul> </li> </ul> </li> </ul> <p>have been taken into account;</p> <ul style="list-style-type: none"> <li>(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;</li> <li>(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. (regulation 16)</li> </ul>	<p>Stage E as described in Figure 3.1 of the IIA (to follow).</p>
<p>Monitoring of implementation of plans or programmes (regulation 17)</p> <p>Monitoring of significant environmental effects of the plan's or programme's implementation with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (regulation 17 (1)).</p> <p>Monitoring arrangements may comprise or include arrangements established for other purposes (regulation 17 (2)).</p>	<p>Stage E as described in Figure 3.1 of the IIA (Section 10 of the IIA).</p>



## Appendix 2 - Relevant Plans, Programmes and Strategies

### Global

Plan, Strategy or Programme	Summary of objectives and targets
WHO Age-friendly Cities Guide (2007)	<ul style="list-style-type: none"> <li>The WHO Age-friendly Cities Guide highlights eight domains that cities and communities can address to better adapt their structures and services to the needs of older people: the built environment, transport, housing, social participation, respect and social inclusion, civic participation and employment, communication, and community support and health services.</li> </ul>

### European

Plan, Strategy or Programme	Summary of objectives and targets
<p>EU Biodiversity Strategy to 2020 (2012)</p> <p>Mid-term Review of the EU Biodiversity Strategy to 2020 (2015)</p>	<ul style="list-style-type: none"> <li>The European Commission adopted an ambitious new strategy to halt the loss of biodiversity and ecosystem services in the EU by 2020. There are six main targets, and 20 actions to help Europe reach its goal. Biodiversity loss is an enormous challenge in the EU, with around one in four species currently threatened with extinction and 88% of fish stocks over-exploited or significantly depleted.</li> <li>The six targets cover: <ul style="list-style-type: none"> <li>Full implementation of EU nature legislation to protect biodiversity</li> <li>Better protection for ecosystems, and more use of green infrastructure</li> <li>More sustainable agriculture and forestry</li> <li>Better management of fish stocks</li> <li>Tighter controls on invasive alien species</li> <li>A bigger EU contribution to averting global biodiversity loss</li> </ul> </li> <li>The new Biodiversity Strategy follows on from the 2006 Biodiversity Action Plan.</li> </ul>
EU Biodiversity Action Plan (2006) and 2010 Assessment	<p>The EU Biodiversity Action Plan addresses the challenge of integrating biodiversity concerns into other policy sectors in a unified way. It specifies a comprehensive plan of priority actions and outlines the responsibility of community institutions and Member States in relation to each. It also contains indicators to monitor progress and a timetable for evaluations. The European Commission has undertaken to provide annual reporting on progress in delivery of the Biodiversity Action Plan. A baseline report was prepared in 2010 to take stock of the 2006 Biodiversity Action Plan and assess the impact it has had on Europe's biodiversity. The report produced by the European Environment Agency, provides the latest facts and figures on the state and trends of different biodiversity and ecosystems components in the EU.</p>
European Landscape Convention	<p>The European Landscape Convention (ELC) is the first international convention to focus specifically</p>

Plan, Strategy or Programme	Summary of objectives and targets
(ratified by the UK Government in 2006)	<p>on landscape, and is dedicated exclusively to the protection, management and planning of all landscapes in Europe.</p> <p>The ELC was signed by the UK government on 24 February 2006, ratified on the 21 November 2006, and became binding on 1 March 2007.</p> <p>The convention highlights the need to recognise landscape in law, to develop landscape policies dedicated to the protection, management and creation of landscapes, and to establish procedures for the participation of the general public and other stakeholders in the creation and implementation of landscape policies. It also encourages the integration of landscape into all relevant areas of policy, including cultural, economic and social policies</p>
EU Sustainable Development Strategy 2002 (revised 2006) (reviewed 2009)	<p>The overall aim of the EU Sustainable Development Strategy is to identify and develop action to enable the EU to achieve a continuous long-term improvement of quality of life through the creation of sustainable communities able to manage and use resources efficiently, able to tap the ecological and social innovation potential of the economy and in the end able to ensure prosperity, environmental protection and social cohesion</p>
<b>EU Directives</b>	
Air Quality Directive 2008/50/EC	<ul style="list-style-type: none"> <li>• This Directive is on ambient air quality and cleaner air for Europe and includes the following key elements:</li> <li>• The merging of most of existing legislation into a single directive (except for the fourth daughter directive) with no change to existing air quality objectives*</li> <li>• New air quality objectives for PM2.5 (fine particles) including the limit value and exposure related objectives – exposure concentration obligation and exposure reduction target</li> <li>• The possibility to discount natural sources of pollution when assessing compliance against limit values</li> <li>• The possibility for time extensions of three years (PM10) or up to five years (NO2, benzene) for complying with limit values, based on conditions and the assessment by the European Commission.</li> </ul> <p><i>* Framework Directive 96/62/EC, 1-3 daughter Directives 1999/30/EC, 2000/69/EC, 2002/3/EC, and Decision on Exchange of Information 97/101/EC.</i></p>
Assessment and Management of Environmental Noise (END Directive 2002/49/EC)	<p>The Environmental Noise Directive or END concerns noise from road, rail and air traffic and from industry. It focuses on the impact of such noise on individuals, complementing existing EU legislation which sets standards for noise emissions from specific sources. The Directive requires:</p> <ul style="list-style-type: none"> <li>• the determination of exposure to environmental noise, through noise mapping</li> <li>• provision of information on environmental noise and its effects on the public</li> </ul>

Plan, Strategy or Programme	Summary of objectives and targets
	<ul style="list-style-type: none"> <li>• adoption of action plans, based upon noise mapping results, which should be designed to manage noise issues and effects, including noise reduction if necessary</li> <li>• preservation by the member states of environmental noise quality where it is good.</li> </ul> <p>The Directive requires mapping and action planning in relation to noise from major roads, major railways, major airports and in agglomerations (large urban areas).</p>
Conservation on Natural Habitats and of Wild Fauna and Flora (Directive 92/43/EEC)	The main aim of this Directive is to promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements. While the Directive makes a contribution to the general objective of sustainable development; it ensures the conservation of a wide range of rare, threatened or endemic species, including around 450 animals and 500 plants. Some 200 rare and characteristic habitat types are also targeted for conservation in their own right
Conservation of Wild Birds Directive 2009/147/EC	This Directive ensures far-reaching protection for all of Europe's wild birds, identifying 194 species and sub-species among them as particularly threatened and in need of special conservation measures.
Energy Performance of Buildings (EU Directive 2010/31/EU)	<p>The objective of this Directive is to promote the improvement of the energy performance of buildings within the Community, taking into account outdoor climatic and local conditions, as well as indoor climate requirements and cost effectiveness considering;</p> <p>This Directive lays down requirements as regards :</p> <ul style="list-style-type: none"> <li>(a) the general framework for the energy performance of buildings;</li> <li>(b) the application of minimum requirements on the energy performance of new buildings;</li> <li>(c) the application of minimum requirements on the energy performance of large existing buildings that are subject to major renovation;</li> <li>(d) energy certification of buildings; and</li> <li>(e) regular inspection of boilers and of air-conditioning systems in buildings and in addition an assessment of the heating installations in which boilers are more than 15 years old.</li> </ul>
Environmental Impact Assessment (EIA) Directive (2014/52/EU)	The newly amended Environmental Impact Assessment (EIA) Directive (2014/52/EU) entered into force on 15 May 2014 to simplify the rules for assessing the potential effects of projects on the environment. It is in line with the drive for smarter regulation, so it reduces the administrative burden. It also improves the level of environmental protection, with a view to making business decisions on public and private investments more sound, more predictable and sustainable in the longer term. It applies to a wide range of defined public and private projects, which are defined in Annexes I and II. All projects listed in Annex I are considered as having significant effects on the environment and require an EIA. For projects listed in Annex II, the national authorities have to decide whether an EIA is needed. This is done by the "screening procedure", which determines the effects of projects on the

Plan, Strategy or Programme	Summary of objectives and targets
Floods Directive (EU Directive 2007/60/EC)	<p>basis of thresholds/criteria or a case by case examination.</p> <p>This Directive requires Member States to assess if all water course and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this flood risk. This Directive also reinforces the rights of the public to access this information and to have a say in the planning process.</p>
Groundwater Directive (EU Directive 2006/118/EC)	<p>This Directive establishes specific measures as provided for in Article 17(1) and (2) of Directive 2000/60/EC in order to prevent and control groundwater pollution. These measures include in particular:</p> <p>(a) criteria for the assessment of good groundwater chemical status; and</p> <p>(b) criteria for the identification and reversal of significant and sustained upward trends and for the definition of starting points for trend reversals.</p> <p>This Directive also complements the provisions preventing or limiting inputs of pollutants into groundwater already contained in Directive 2000/60/EC, and aims to prevent the deterioration of the status of all bodies of groundwater.</p>
Landfill Directive 1999/31/EC	<p>The objective of the Directive is to prevent or reduce as far as possible negative effects on the environment from the landfilling of waste, by introducing stringent technical requirements for waste and landfills.</p> <p>The Directive is intended to prevent or reduce the adverse effects of the landfill of waste on the environment, in particular on surface water, groundwater, soil, air and human health.</p>
Promotion of the use of Biofuels or other Renewable Fuels for Transport (EU Directive 2003/30/EC)	<p>Objective to promote the use of bio-fuels or other renewable fuels to replace diesel or petrol for transport purposes in each Member State, with a view to contributing to objectives such as meeting climate change commitments, environmentally friendly security of supply and promoting renewable energy sources</p>
<p>Renewable Energy (EU Directive 2009/28/EC)</p> <p>Com/2016 Directive of EU Parliament and the council on promotion of the use of energy from renewable sources</p> <p>The Revised Renewable energy Directive (2018)</p>	<p>The Directive on renewable energy sets ambitious targets for all Member States, such that the EU will reach a 20% share of energy from renewable sources by 2020 and a 10% share of energy specifically in the transport sector. It also improves the legal framework for promoting renewable electricity, requires national action plans that establish pathways for the development of renewable energy sources including bio-energy, creates cooperation mechanisms to help achieve the targets cost effectively and establishes the sustainability criteria for bio-fuels.</p>

Plan, Strategy or Programme	Summary of objectives and targets
Strategic Environmental Assessment (SEA Directive 2001/42/EC)	<p>Requires the formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. An SEA is mandatory for plans/programmes which are:</p> <ul style="list-style-type: none"> <li>• are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste/ water management, telecommunications, tourism, town &amp; country planning or land use <u>and</u> which set the framework for future development consent of projects listed in the EIA Directive, or</li> <li>• have been determined to require an assessment under the Habitats Directive.</li> </ul>
Urban Waste Water Directive (91/271/EEC)	<p>The Council Directive 91/271/EEC concerning urban waste-water treatment was adopted on 21 May 1991. Its objective is to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors (see Annex III of the Directive) and concerns the collection, treatment and discharge of Domestic waste water, Mixture of waste water and Waste water from certain industrial sectors (see Annex III of the Directive)</p>
Waste Framework Directive (2008/98/EC)	<p>To set up a system for the co-ordinated management of waste within the European Community in order to limit waste production. Member states must promote the prevention, recycling and conversion of wastes with a view to their reuse.</p>
Water Framework Directive (EU Directive 2000/60/EC)	<p>The purpose of this Directive is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater. All inland and coastal waters to reach good ecological status by 2015. Indicates the importance of applying and developing SUDS policy.</p>
Industrial Emissions Directive (Directive 2010/75/EU)	<p>This directive commits European Union member states to control and reduce the impact of industrial emissions on the environment.</p>

## National

Plan, Strategy or Programme	Summary of objectives and targets
<b>Legislation</b>	
6 <sup>th</sup> Carbon Budget	The Climate Change Committee sets releases a Carbon Budget which reviews evidence and carbon reduction from the past year to release a number of recommendations and policy suggestions to complement to reach the carbon budget and aim to achieve net carbon zero.
Air Quality Standards Regulations (2010)	These regulations transpose into English law the requirements of Directives 2008/50/EC and 2004/107/EC on ambient air quality
Air Quality Standards (Amendment) Regulations 2016	These Regulations amend the Air Quality Standards Regulations 2010. Those Regulations transpose Directive 2008/50/EC on ambient air quality etc. and Directive 2004/107/EC relating to arsenic etc. in ambient air. Both Directives were amended by Commission Directive 2015/1480.
<p>Building Regulations: England and Wales (Part L1A – Conservation of Fuel and Power, 2010 and 2013) and (Part G Sanitation, hot water safety and water efficiency, 2015) and Part H Drainage and waste disposal, 2015)</p> <p>Part L1A – conservation of fuel and power in new dwellings, 2013 with 2016 amendments. Part G – sanitation, hot water safety and water efficiency (2015 edition with 2016 amendments) Part H – no change.</p>	<p>Part L – Conservation of fuel and power The legal framework and Approved Documents for Part L (Conservation of fuel and power) were last revised by amendments that came into effect in 2013 and 2014. DCLG has published: The 2013 edition of Approved Document L1A, Conservation of fuel and power in new dwellings, is the current edition for use in England. It came into effect on 6 April 2014 and replaces the 2010 edition (incorporating further 2010 amendments).</p> <p>Part G (Sanitation, hot water safety and water efficiency)The 2015 edition contains changes to the water efficiency requirements. In particular, it introduces an optional requirement of 110 litres/person/day where required by planning permission, and an alternative fittings-based approach to demonstrating compliance. It also includes the water-efficiency calculation methodology for new dwellings, approved by the Secretary of State. This edition incorporates previous amendments. It replaces the 2010 edition of Approved Document G, as amended. The changes reflect amendments to regulations 36 and 37 of the Building Regulations 2010 and regulation 20 of the Building (Approved Inspectors) Regulations 2010. There has been no amendment to the requirements in Part G of Schedule 1 to the Building Regulations 2010.</p> <p>Part H ( Drainage and waste disposal) The 2015 edition of Approved Document H (Drainage and Waste Disposal) contains changes to guidance on waste disposal. It also incorporates previous amendments. The 2015 edition takes</p>

Plan, Strategy or Programme	Summary of objectives and targets
	effect on 1 October 2015 for use in England*. The 2002 edition, as amended, will continue to apply to work started before 1 October 2015 or work subject to a building notice, full plans application or initial notice submitted before that date.
The Carbon Budget Order (2021)	The Carbon Budget sets out that the UK must cut carbon emissions by 78% against 1990 level baseline data by 2035. This is an interim target adopted into law as a stepping stone to meet the net carbon zero target as set out in the Climate Change Act by 2050. The Carbon Budget Order 2021 (S/2021/750) was made on 23 June 2021 and came into force on 24 June 2021.
Climate Change Act (2008)	<p>The Climate Change Act creates a new approach to managing and responding to climate change in the UK, by:</p> <ul style="list-style-type: none"> <li>• setting ambitious, legally binding targets</li> <li>• making powers to help meet those targets</li> <li>• strengthening the institutional framework</li> <li>• enhancing the UK's ability to adapt to the impact of climate change</li> <li>• establishing clear and regular accountability to the UK Parliament and to the devolved legislatures</li> </ul>
Community Infrastructure Levy Regulations (2010) (as amended)	The Community Infrastructure Levy (the levy) came into force in April 2010. It allows local authorities in England and Wales to raise funds from developers undertaking new building projects in their area. The money can be used to fund a wide range of infrastructure that is needed as a result of development. This includes new or safer road schemes, flood defences, schools, hospitals and other health and social care facilities, park improvements, green spaces and leisure centres.
Civil Contingencies Act 2004 (CCA)	<p>Legislation that aims to provide a single framework for civil protection. The Act and accompanying non-legislative measures, delivers a single framework for civil protection in the country. The National Flood and Coast Erosion Management Strategy (July 2011) require communities to prepare flood action plans and link with the Cabinet Office's initiative to develop wider community resilience to threats and hazards. Part 1 of the Act and supporting Regulations and statutory guidance establish a clear set of roles and responsibilities for those involved in emergency preparation and response at the local level. They are required to:</p> <ul style="list-style-type: none"> <li>• assess the risk of emergencies occurring and use this to inform contingency planning; put in place emergency plans;</li> <li>• put in place Business Continuity Management arrangements;</li> </ul>

Plan, Strategy or Programme	Summary of objectives and targets
The CROW Act 2000	An Act to make new provision for public access to the countryside; to amend the law relating to public rights of way; to enable traffic regulation orders to be made for the purpose of conserving an area's natural beauty; to make provision with respect to the driving of mechanically propelled vehicles elsewhere than on roads; to amend the law relating to nature conservation and the protection of wildlife; to make further provision with respect to areas of outstanding natural beauty; and for connected purposes.
Energy Act 2013	<p>The Energy Act provides for some of the key elements of the Coalition's Programme for Government and its first Annual Energy Statement. It is a first step in our legislative programme, and further legislation has been sought to implement, for example, the findings of the Electricity Market Reform Programme.</p> <p>The Act provides for a step change in the provision of energy efficiency measures to homes and businesses, and makes improvements to our framework to enable and secure low-carbon energy supplies and fair competition in the energy markets.</p>
Environmental Assessment of Plans and Programmes regulations 2004	Provides the regulations for the implementation of the Strategic Environmental Assessment Directive (EU/2001/42/EC) for certain plans and programmes that are likely to have significant environmental impacts
Environmental Noise (England) Regulations 2006 (as amended in 2018)	The regulations transpose the EU Directive 2002/49/EC that relates to the assessment and management of environmental noise.
Growth and Infrastructure Act 2013	An Act to make provision in connection with facilitating or controlling the following, namely, the provision or use of infrastructure, the carrying-out of development, and the compulsory acquisition of land; to make provision about when rating lists are to be compiled; to make provision about the rights of employees of companies who agree to be employee shareholders; and for connected purposes
Human Rights Act 1998	An Act to give further effect to rights and freedoms guaranteed under the European Convention on Human Rights
Local Democracy, Economic Development and Construction Act 2009	The Act seeks to create greater opportunities for community and individual involvement in local decision-making. It also provides for greater involvement of local authorities in local and regional economic development
Local Government Act 2000	<p>This act received Royal Assent in July 2000 and is made up of three parts:</p> <ul style="list-style-type: none"> <li>• Part I introduces a new power for local authorities to promote the economic, social or environmental wellbeing of an area.</li> </ul>

Plan, Strategy or Programme	Summary of objectives and targets
	<ul style="list-style-type: none"> <li>• Part II requires that all local authorities move away from the traditional committee style of decision making in which all members had a formal decision-making role, to one of four executive models. These are; leader or cabinet, mayor or cabinet, mayor or council manager, or alternative arrangements.</li> <li>• Part III introduces a new ethical framework for councils, including a requirement to adopt a code of conduct for members and implement a standards committee. The general functions of the standards committee are to promote and maintain high standards of conduct within the local authority, and to assist members of the authority to observe the code of conduct.</li> </ul>
Local Government 2010	The Local Government Act 2010 is an Act of the Parliament of the United Kingdom. It revokes structural change orders that would have established Exeter and Norwich as unitary authorities and prevents the implementation of the Suffolk unitary proposals.
Localism Act (2011)	An Act to make provision about the functions and procedures of local and certain other authorities; to make provision about the functions of the Commission for Local Administration in England; to enable the recovery of financial sanctions imposed by the Court of Justice of the European Union on the United Kingdom from local and public authorities; to make provision about local government finance; to make provision about town and country planning, the Community Infrastructure Levy and the authorisation of nationally significant infrastructure projects; to make provision about social and other housing; to make provision about regeneration in London; and for connected purposes.
Equality Act (2010)	<p>This act replaced previous anti-discrimination laws with a single act to make the law simpler and to remove inconsistencies. This makes the law easier for people to understand and comply with. The act also strengthened protection in some situations.</p> <p>The act covers nine protected characteristics, which cannot be used as a reason to treat people unfairly. Every person has one or more of the protected characteristics, so the act protects everyone against unfair treatment. The protected characteristics are:</p> <ul style="list-style-type: none"> <li>• Age</li> <li>• Disability</li> <li>• gender reassignment</li> <li>• marriage and civil partnership</li> <li>• pregnancy and maternity</li> <li>• race</li> </ul>

Plan, Strategy or Programme	Summary of objectives and targets
	<ul style="list-style-type: none"> <li>• religion or belief</li> <li>• sex</li> <li>• sexual orientation</li> </ul>
Flood and Water Management Act (2010)	This Act provides a more comprehensive management of flood risk for people, homes and businesses, protects water supplies to the consumer and helps safeguard community groups from unaffordable rises in surface water drainage charges. The Act introduces into law the concept of flood risk management rather than 'flood defence' and provides the framework for delivery of flood and coastal erosion risk management through national and local risk strategies. The Act establishes a SuDS approving body (SAB). The SAB will have responsibility for the approval of proposed drainage systems in new developments and redevelopments (in accordance with National Standards for Sustainable Drainage). The Act requires Lead Local Flood Authorities (LLFA's) to maintain a register and record important flood risk management strategies and to investigate flooding to determine which authority has responsibility.
London Squares Preservation Act, 1931	This act identifies a London Squares which are to be provided protection from development.
Natural Environment White Paper (2011)	The Natural Environment White Paper recognises that a healthy natural environment is the foundation of sustained economic growth, prospering communities and personal wellbeing. It sets out how the value of nature can be mainstreamed across our society by facilitating local action; strengthening the connections between people and nature; creating a green economy and showing leadership in the EU and internationally. It set out 92 specific commitments for action.
Natural Environment and Rural Communities Act (2006)	The Natural Environment and Rural Communities Act is designed to help achieve a rich and diverse natural environment and thriving rural communities through modernised and simplified arrangements for delivering Government policy. The Act was published by Parliament and is accompanied by a set of explanatory notes, a Regulatory Impact Assessment and a policy statement.
The Neighbourhood Planning (General) Regulations (2012)	The Regulations set out the procedure for the designation of neighbourhood areas and neighbourhood forums and for the preparation of neighbourhood development plans and neighbourhood development orders (including community right to build orders). A separate instrument will be brought forward in relation to neighbourhood planning referendums.
The Neighbourhood Planning (General) (Amendment) Regulations 2015	These Regulations amend the Neighbourhood Planning (General) Regulations 2012 which made provision for neighbourhood planning as provided in the Localism Act 2011

Plan, Strategy or Programme	Summary of objectives and targets
Planning Act (2008)	The Planning Act 2008 was granted Royal Assent on 26 November 2008. The Act introduced a new stream-lined system for decisions on applications to build nationally significant infrastructure projects (NSIPs) in England and Wales, alongside further reforms to the town and country planning system and the introduction of a Community Infrastructure Levy (CIL).
Planning and Compulsory Purchase Act (2004)	The Act received Royal Assent on 13 May 2004 and the provisions of the Act were introduced through a series of Commencement Orders and Regulations. The Act strengthened the focus on sustainability, transparency, flexibility and speed. The aim of the Act is to give effect to the Government's policy on the reform of the planning system, the principal features of which are set out in the policy statement Sustainable communities: Delivering through planning which was published on 23 July 2002.
Planning and Energy Act (2008)	This Act allows local councils to set targets in their areas for on-site renewable energy, on-site low carbon electricity and energy efficiency standards in addition to national requirements. It requires developers to source at least 10% of any new building's energy from renewable sources.
Planning (Listed Buildings and Conservation Areas) Act (1990)	This Act consolidates certain enactments relating to special controls in respect of buildings and areas of special architectural or historic interest.
Pollution Prevention and Control Act 1999	This Act gives the Secretary of State the power to make regulations providing for a new pollution control system to meet the requirements of European Council Directives on Integrated Pollution Prevention and Control and for other measures to prevent and control pollution.
Sustainable Communities Act (2007) (Amendment) Act 2010	The Sustainable Communities Act 2007 provides local authorities and local communities with the opportunity to ask central government to devolve more power to them in order to improve the sustainability of their local area. The amendment improves the process to allow communities a greater say in how their proposed changes can happen.
Town and Country Planning Act (1990)	The Town and Country Planning Act 1990 is an act of the British Parliament regulating the development of land in England and Wales.
The Town and Country Planning (Environmental Impact Assessment) Regulations (2011) Revised 2017	These regulations are used to determine whether a planning application will require an Environmental Impact Assessment (EIA). These Regulations replace the Town and Country Planning (Environmental Impact assessment (England and Wales) Regulations 1999 (SI No. 293) ("the 1999 regulations") and subsequent amending instruments. The Town and Country Planning (Environmental impact Assessment) (Mineral Permissions and Amendment) (England) Regulations 2008 remain in force. These Regulations, except for the provisions relating to projects serving national defence purposes, extend to England only. The 1999 Regulations remain in force for Wales.

Plan, Strategy or Programme	Summary of objectives and targets
The Town and Country Planning (Environmental Assessment and Permitted Development) Regulations 1995	These Regulations are concerned with the further implementation in England and Wales of Council Directive 85/337/EEC.
The Town and Country Planning (General Permitted Development) (England) Order (2015, 2018).	The main purpose of this Order is to grant planning permission for certain classes of development without any requirement for an application to be made under Part III of the Town and Country Planning Act 1990.
The Town and Country Planning (Compensation) (England) Regulations (2012, 2017)	The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2012 amends the Town and Country Planning (General Permitted Development) Order 1995 ("GPDO").
The Town and Country Planning (Compensation) (England) (Amendment) Regulations (2014)	The Town and Country Planning (Compensation) (England) Amendment) Regulations 2014 ("the Compensation Regulations") amend the Town and Country Planning (Compensation) (England) Regulations 2013 to limit the circumstances in which compensation is payable in the event that the new permitted development rights are withdrawn.
The Town and Country Planning (Local Planning) (England) Regulations 2012	These regulations amend the Town and Country Planning (Local Development) (England) Regulations 2009, in response to the enactment of the Localism Act 2011.
The Town and Country Planning (Major Infrastructure Project Inquiries Procedure) (England) Rules 2005	These rules outline the procedures to be followed for local inquiries into 1) applications for planning permission or 2) the approval of local planning authorities for major developments deemed to have national or regional importance.
The Town and Country Planning (Modification and Discharge of Planning Obligations) Regulations 1992	This Regulation gives further detail to the procedure for appeals against enforced planning obligations.
The Town and Country Planning (Tree Preservation) (England) Regulations 2012	Local planning authorities protect trees in the interests of amenity by making Tree Preservation Orders (TPOs). Provisions are spread across primary and various secondary legislation and different rules apply depending on when the TPO is made.
The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010	This amendment introduces a definition of houses in multiple occupation into the Use Classes Order.

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The Town and Country Planning (Use Classes) Order 1987	This Order revokes and replaces the Town and Country Planning Order 1972 as amended by the Town and Country Planning Order 1983.
The Wildlife and Countryside act 1981, as amended	Consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the conservation of wild birds (Birds Directive) in Great Britain (NB Council Directive 79/409/EEC has now been replaced by Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (codified version)).
<b>Planning Framework</b>	
National Planning Policy Framework (NPPF) (2019)	The Government has produced a simple national planning policy framework setting out their priorities for the planning system in England in a single, concise document covering all major forms of development proposals handled by local authorities. All the national planning policies set out in PPSs, MPSs, PPGs and MPGs, have been superseded by the NPPF. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
National Planning Practice Guidance (NPPG) (2014)	On 6 March 2014 the Department for Communities and Local Government (DCLG) launched this planning practice guidance web-based resource. This was accompanied by a Written Ministerial Statement which includes a list of the previous planning practice guidance documents cancelled when this site was launched. For the first time, planning practice guidance is now available entirely online in a usable and accessible way.
<b>Government Strategies</b>	
Air Quality Strategy (2007)	The Strategy: sets out a way forward for work and planning on air quality issues; sets out the air quality standards and objectives to be achieved; introduces a new policy framework for tackling fine particles; identifies potential new national policy measures which modeling indicates could give further health benefits and move closer towards meeting the Strategy's objectives.
Clean Air Strategy (2019)	The strategy sets out how sources of air pollution will be tackled, and how devolved administrations intend to make their share of emissions reductions. It builds on the previous strategy and centrally-set goals regarding reducing emissions of the five most damaging air pollutants, and introduces a new goal of cutting public exposure to particulate matter pollution, as recommended by the World

Plan, Strategy or Programme	Summary of objectives and targets
	Health Organization.
Clean Growth Strategy (2017)	Produced by BEIS, this strategy sets out how the government plans to reduce greenhouse gas emissions, increase efficiency and lower the cost of energy.
Biodiversity – The UK Action Plan (1994)	The Action Plan is the UK Government's response to the Convention on Biological Diversity (CBD) signed in 1992. It describes the UK's biological resources and commits a detailed plan for the protection of these resources. The first lists of Priority Species and Habitats were published by Government in 1995 as part of the UK Biodiversity Action Plan (UK BAP). They included over 300 species of which 11 were butterflies and 53 were moths.
Biodiversity and Geological Conservation: Statutory obligations and their impact within the planning system.- Government circular 06/05	This circular provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England. It complements the national planning policy in the National Planning Policy Framework and the Planning Practice Guidance.
Conserving Biodiversity – the UK approach (DEFRA 2007)  Biodiversity 2020: A strategy for England's wildlife and ecosystem services (DEFRA 2011)	This statement has been prepared by the UK Biodiversity Standing Committee <sup>1</sup> on behalf of the UK Biodiversity Partnership. Its purpose is to set out the vision and approach to conserving biodiversity within the UK's devolved framework for anyone with a policy interest in biodiversity conservation. It sets out an approach to biodiversity conservation that is designed not only to meet the commitment to halt the loss of biodiversity by 2010, but to guide action well into the second decade of the 21st century at a time when the challenges faced by the natural environment are great.
Department of Health Public Health Strategy – healthy lives, healthy people (July 2011)	<p>This policy statement sets out the progress the government has made in developing the new public health system. In doing so the paper sets out how the government expect the reformed public health system to work including:</p> <ul style="list-style-type: none"> <li>• clarifying the role of local authorities and the Director of Public Health in health improvement, health protection and population healthcare;</li> <li>• proposals for who is responsible for commissioning the different public health services;</li> <li>• the mandatory services local authorities will be required to provide;</li> <li>• the grant conditions we expect to place on the local authority public health grant;</li> <li>• establishing Public Health England as an Executive Agency to provide greater operational</li> </ul>

Plan, Strategy or Programme	Summary of objectives and targets
	<p>independence within a structure that is clearly accountable to the Secretary of State for Health;</p> <ul style="list-style-type: none"> <li>• clear principles for emergency preparedness, resilience and response.</li> </ul>
The Sustainable Development Strategy for the NHS, Public Health and Social Care System	This strategy outlines a vision and three goals based on the challenges outlined above to aim for by 2020. It describes the opportunities to reduce our environmental impacts, improve our natural environment, increase readiness for changing times and climates and strengthen social cohesion. It also explores how this can be taken forward as a system and outlines specific areas of focus that can be used to guide action.
<p>Departments of Health and Transport- Active Travel Strategy 2010</p> <p>Working Together to Promote Active Travel: A briefing for local authorities 2016</p>	The Department of Health and Department for Transport jointly published a new Active Travel Strategy. The strategy highlights plans to put walking and cycling at the heart of local transport and public health strategies over the next decade. The guiding principles for the strategy are that walking and cycling should be everyday ways of getting around – not just for their own sake but also because of what they can do to improve public health, tackle congestion, reduce carbon emissions and improve the local environment.
Healthy Weight Healthy Lives: A Cross Government Strategy for England (2008)	This cross-government strategy is the first step in a sustained programme to support people to maintain a healthy weight. It will be followed by a public annual report that assesses progress, looks at the latest evidence and trends, and makes recommendations for further action.
Future in Mind: promoting, protecting and improving our children and young people’s mental health and wellbeing (2015)	The report identifies both the case for change and sets out a series of goals and commitments to improve emotional and mental health. It emphasises that mental health and emotional wellbeing is everyone’s business and the importance of establishing a continuum of support from prevention and resilience to effective and timely clinical treatment.
Biodiversity 2020: A strategy for England’s wildlife and ecosystem services and its outcomes and actions.	This new, ambitious biodiversity strategy for England builds on the Natural Environment White Paper and provides a comprehensive picture of how we are implementing our international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea
Noise Policy Statement for England (DEFRA 2010)	This statement sets out the long term vision of Government noise policy, which is to promote good health and a good quality of life through the management of noise within the context of Government policy on sustainable development. The policy seeks to make explicit the implicit underlying principles and aims regarding noise management and control that are to be found in existing policy

Plan, Strategy or Programme	Summary of objectives and targets
	documents, legislation and guidance.
Plan for Growth – (March 2011)	<p>The Government's economic policy objective is to achieve strong, sustainable and balanced growth that is more evenly shared across the country and between industries. The Plan for Growth contains four overarching ambitions that will ensure the progress is made towards achieving this economic objective. The ambitions are:</p> <ol style="list-style-type: none"> <li>1. to create the most competitive tax system in the G20;</li> <li>2. to make the UK one of the best places in Europe to start, finance and grow a business;</li> <li>3. to encourage investment and exports as a route to a more balanced economy; and</li> <li>4. to create a more educated workforce that is the most flexible in Europe.</li> </ol>
Mainstreaming sustainable development (2011)	This document sets out the Coalition Government's vision for sustainable development and a package of measures to deliver it through the Green Economy, action to tackle climate change, protecting and enhancing the natural environment, and fairness and improving wellbeing, and building a Big Society
Strategic Review of Health Inequalities in England Post 2010 (The Marmot Review)	<p>In November 2008, Professor Sir Michael Marmot was asked by the Secretary of State for Health to chair an independent review to propose the most effective evidence-based strategies for reducing health inequalities in England from 2010. The strategy will include policies and interventions that address the social determinants of health inequalities.</p> <p>The Review had four tasks</p> <ol style="list-style-type: none"> <li>1 Identify, for the health inequalities challenge facing England, the evidence most relevant to underpinning future policy and action</li> <li>2 Show how this evidence could be translated into practice</li> <li>3 Advise on possible objectives and measures, building on the experience of the current PSA target on infant mortality and life expectancy</li> <li>4 Publish a report of the Review's work that will contribute to the development of a post- 2010 health inequalities strategy.</li> </ol>
Construction 2025 (2013)	<p>This Strategy is aimed at providing clarity around the existing policy framework and signalling the future direction of Government policy. It aims to realise the shared vision of sustainable construction by:</p> <ul style="list-style-type: none"> <li>• Providing clarity to business on the Government's position by bringing together diverse regulations and initiatives relating to sustainability;</li> </ul>

Plan, Strategy or Programme	Summary of objectives and targets
	<ul style="list-style-type: none"> <li>• Setting and committing to higher standards to help achieve sustainability in specific areas;</li> <li>• Making specific commitments by industry and Government to take the sustainable construction agenda forward.</li> </ul>
The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting (2018)	The National Adaptation Programme sets out what government, businesses and society are doing to become more climate ready. It contains a register of actions which includes all the actions agreed in the programme so far. It also aligns risks identified in the Climate Change Risk Assessment to actions being undertaken or to be undertaken and the timescales according to each theme.
Climate change: second national adaptation programme (2018 to 2023)	This report sets out what government and others will be doing over the next 5 years to be ready for the challenges of climate change and forms part of the five-yearly cycle of requirements laid down in the Climate Change Act 2008. It details how the third cycle of adaptation reporting.
The Carbon Plan: Delivering our low carbon future (2011)	This plan sets out how the UK will achieve decarbonisation within the framework of our energy policy: to make the transition to a low carbon economy while maintaining energy security, and minimising costs to consumers, particularly those in poorer households.
UK Renewable Energy Strategy (2009)  UK Renewable Energy Roadmap (2011)	<p>The Renewable Energy Strategy sets a path towards increasing UK generation of renewable projects. It sets out the actions the Government are taking to ensure the targets of producing 15% of UK energy needs from renewable energy sources by 2020 are met. To achieve this the strategy calls for;</p> <ul style="list-style-type: none"> <li>• 30% of electricity supply to come from renewable sources, including 2% from micro-generation</li> <li>• 12% of heat supply to come from renewable sources</li> <li>• 10% of transport supply from renewable sources</li> </ul>
UK Sustainable Procurement Action Plan (2007)	<p>The Government launched a package of actions to deliver the step change needed to ensure that supply chains and public services will be increasingly low carbon, low waste and water efficient, respect biodiversity and deliver wider sustainable development goals.</p> <p>The Action Plan puts in place clear lines of accountabilities and reporting, and develops plans to raise the standards and status of procurement practice in Government which will strengthen delivery of these targets.</p>
Future Water: The Government's Water Strategy for England (2011)	This includes: sustainable delivery of secure water supplies, an improved and protected water environment, fair, affordable and cost-reflective water charges, reduced water sector greenhouse gas emissions and more sustainable and effective management of surface water.
Waste Management Plan for	The waste management plan for England (WMPE) provides an analysis of the current waste

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<p>England (2013)</p> <p>Updated in 2014 under the National Planning Policy for Waste</p>	<p>management situation in England and fulfils the mandatory requirements of article 28 of the revised Waste Framework Directive (rWFD). The plan does not introduce new policies or change the landscape of how waste is managed in England. Its core aim is to bring current waste management policies under the umbrella of one national plan.</p>
<p>National Flood and Coast Erosion Management Strategy (July 2011)</p>	<p>Objectives are to:</p> <ul style="list-style-type: none"> <li>• ensure a clear understanding of the risks of flooding and coastal erosion</li> <li>• set out clear and consistent plans for risk management</li> <li>• manage flood and coastal erosion risks in an appropriate way</li> <li>• ensure that emergency plans and responses to flood incidents are effective</li> <li>• help communities to recover more quickly and effectively after incidents.</li> </ul>
<p>National Flood Emergency Framework (2014)</p>	<p>In planning and preparing for a flooding emergency, the Government's strategic objectives are to:</p> <ul style="list-style-type: none"> <li>• protect human life and alleviate suffering; and, as far as possible, property and the environment;</li> <li>• support the continuity of everyday activity and the restoration of disrupted services at the earliest opportunity; and</li> <li>• uphold the rule of law and the democratic process.</li> </ul>
<p>Prevention is better than cure: the role of waste prevention in moving to a more resource efficient economy (2013)</p>	<p>This document sets out the Waste Prevention Programme for England. It articulates the actions for government and others which together will move us towards reducing waste. The aim of the Programme is to improve the environment and protect human health by supporting a resource efficient economy, reducing the quantity and impact of waste produced whilst promoting sustainable economic growth.</p>
<p>NHS Five Year Forward View (2014)</p>	<p>The NHS Five Year Forward View was published on 23 October 2014 and sets out a vision for the future of the NHS. It has been developed by the partner organisations that deliver and oversee health and care services including NHS England, Public Health England, Monitor, Health Education England, the Care Quality Commission and the NHS Trust Development Authority. Patient groups, clinicians and independent experts have also provided their advice to create a collective view of how the health service needs to change over the next five years if it is to close the widening gaps in the health of the population, quality of care and the funding of services.</p>

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<b>Guidance and Other Reference Documents</b>	
A Practical Guide to the Strategic Environmental Assessment Directive (2005)	Practical guidance, published in September 2005, on applying European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”.
BREEAM (Building Research Establishment Environmental Assessment Method) (2008)	BREEAM addresses wide-ranging environmental and sustainability issues and enables developers and designers to prove the environmental credentials of their buildings. It uses a straightforward scoring system that is transparent, easy to understand and supported by evidence-based research; has a positive influence on the design, construction and management of buildings and sets and maintains a robust technical standard with rigorous quality assurance and certification
Environment Agency – Climate Change, adapting for tomorrow (2009)	This report shows how the Environment Agency are working, often in partnership with others, to help communities and businesses adapt, while still protecting the natural environment.
Environment Agency - Creating a better place. Our corporate strategy (2010-2015)	This strategy sets out the Environment Agency’s aims for the period to 2015 and describes the role they will play in being part of the solution to the environmental challenges society faces. It sets out how the EA will continue to review their priorities and ways of working to ensure value for money whilst creating a better place for people and the environment.
Environment Agency - Creating a better place Our ambition to 2020 (2018)	This strategy sets out the Environment Agency’s aims for the period to 2020 and describes the role they will play in being part of the solution to the environmental challenges society faces.
Environment Agency - Flood risk assessments: climate change allowances (2016)	Guidance on how climate change could affect flood risk to new development.
Environment Agency – Building a better environment. A guide for developers (2013)	This guide provides advice on making sure development contributes to the long-term environmental quality of our country. The guide gives practical advice on each of the environmental issues that may affect a site. This ranges from how you can reduce flood risk through to creating quality green space in your development. It gives pointers for building sustainable, cost-effective homes, helping create an environment in which people will really want to live. It also provides examples of sites where this good practice has already been applied.
Environment Agency State of Environment Report for Southwark (2010)	This report provides a snapshot of the environment in the London Borough of Southwark. It outlines trends and changes in the environment, and highlights some of the work being carried out in the local areas to improve the environment, and people’s experience of it. The report has been compiled as an

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	extension of the London State of the Environment report to provide a local focus on the boroughs and the health of their environment.
Environment Agency: guidance for developments requiring planning permission and environmental permits 2012	This guidance sets out how the Environment Agency will respond to planning consultations that require an environmental permit under the Environmental Permitting (England and Wales) Regulations 2010 (EPR).
Environment Agency Policy paper: Preliminary flood risk assessments and flood risk areas (2011) and Map of Flood Risk areas in England	The Environment Agency (EA) is responsible for managing flood risk from main rivers, the sea and reservoirs. Lead local flood authorities, unitary authorities or county councils, are responsible for local sources of flood risk, in particular surface water, groundwater and ordinary watercourses. To manage flood risk both EA and lead local flood authorities must follow a 6 year cycle of planning. The current planning cycle runs from 2010 to 2015.
Environment Agency Green Roof Toolkit (2013)	Environment Agency on-line toolkit which sets out guidance for site specific opportunities, green roof design and technical assessment The vision is that developers will promote the use of green roofs to: <ul style="list-style-type: none"> <li>• create a better and more sustainable London</li> <li>• deliver better quality places to live and work</li> <li>• create a low-carbon city</li> <li>• adapt to and mitigate the effects of climate change</li> </ul>
Environment Agency: Groundwater Protection (2017)	The document is a key Environment Agency reference for LPAs, developers and land owners. It sets out our approach to groundwater protection and management and what we want others to do. It covers our high-level approach, the technical background to our work and an introduction to the tools we use. It also describes the legal framework the EA works within and the approaches and positions it takes to regulate and influence certain activities and issues.
Environment Agency: Guiding Principles for Land Contamination (2010). Revised 2014.	The GPLC documents were developed initially for landowners, developers, advisors and practitioners involved in redevelopment and evaluation of land contamination. These documents refer to relevant UK guidance and highlight specific steps and considerations involved in evaluating risks associated with land and water contamination.
Water for Life (2011) Government White paper	The Water White Paper focuses on the challenges facing the water sector, including maintaining water supplies, keeping bills affordable and reducing regulation. It recognises the need to protect rivers, streams and lakes from pollution and unsustainable abstraction, and acknowledges the critical importance of water supply and sewerage infrastructure.

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Forestry Commission – The case for trees (2010)	This document aims to inspire people involved in planning policy and practice to become champions and advocates for trees.
Neighbourhood Planning Act 2017	Information on what neighbourhood planning is, why it matters, how it works, and sources of advice and support available for communities.
English Indices of Deprivation 2015	The Index of Multiple Deprivation 2015 combines a number of indicators, chosen to cover a range of economic, social and housing issues, into a single deprivation score for each small area in England. This allows each area to be ranked relative to one another according to their level of deprivation.
Making the Case for investment in the walking environment - summary report (2016)	This document provides an extensive report detailing the key investments in the walking environment, in addition to outlining the benefits of walking friendly places and the identified cost of effectiveness.
How to get more children walking to school: A best practice guide by Living Streets (2016)	This document comprises of the recommendations of the physical and financial benefits of walking for everyone, captured from a 'Walk to School outreach project carried out with various boroughs across England and Wales.
Environment Agency: Land contamination: risk management (2019)	This guidance is based on the Model procedures for the management of land contamination - contaminated land report (CLR11). The scope, framework and purpose remain the same. The process involves identifying, making decisions on, and taking appropriate action to deal with land contamination in a way that is consistent with government policies and legislation within the UK.
Natural England: A Natural Development (2009)	The Natural Development Project launched on 3 November 2009 to demonstrate how both large and small scale development can incorporate green infrastructure in practice. Natural England and key players in the development sector formed a partnership to understand how to value, design and create quality green infrastructure. The partnership aims to demonstrate how – at different scales and locations – the contribution of the natural environment in regeneration can move from that of traditional landscaping to one of providing vital spaces for people, wildlife, health, wellbeing, and climate change adaptation. The Natural Development project will provide a focus for our engagement with real sites and enable us to practically demonstrate positive planning with developers. It will work to highlight opportunities and overcome barriers to success and enable sharing of best practice to

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	<p>support the mainstreaming of green infrastructure in development and regeneration.</p> <p>Over the coming months and years the project will collect and share:</p> <p>Case Studies, focusing on a range of sites – initially in the Thames Gateway, and widening out as the project progresses.</p> <p>Commentary on problems, opportunities, and issues for large and small scale developments.</p> <p>Technical information relating to our work with developers across the country.</p>
Accounting for biodiversity in planning (2016)	This document provides information on the issues to be considered at the forward planning stage, including gathering a sufficient evidence base, biodiversity opportunity mapping, green infrastructure provision, setting spatial biodiversity objectives and targets and identifying potential for biodiversity enhancements.
English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)	This document contains policies and guidance for the sustainable management of the historic environment.
Sustainability Appraisal and Strategic Environmental Assessment (2016)	This guidance focuses on SEA/SA for development plans, building on existing Government advice, it is equally applicable to the preparation of SEAs for other types of documents, such as Local Transport Plans and Water Resource Management Plans.
Conservation Bulletin 47: Characterisation, English Heritage (2005)	A bulletin that explores the subject of characterisation and sets out some examples of studies of local character.
Understanding Place: Historic Area Assessments in a Planning and Development Context, English Heritage (2010).	Sets out guidance for undertaking Historic Area Assessments to inform plan making and development management.
Historic England: Understanding Place Historic Area Assessments (2017)	This guidance note supersedes the English Heritage guidance published in June 2010 and a companion document, Understanding place: Historic Area Assessments in a planning and development context. This guidance explains how to undertake Historic Area Assessments (HAAs) in order to understand and explain the heritage interest of an area.
Understanding Place Historic Area Assessments: Principles and	Sets out guidance for how to undertake assessments for historic areas in order to produce a Historic Area Assessment.

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Practice, English Heritage (2010)	
Valuing Places: Good Practice in Conservation Areas, English Heritage (2011)	Sets out a series of exemplary case studies for managing change in the historic environment.
Seeing The History In The View: A Method For Assessing Heritage Significance Within Views, English Heritage (2011)	Sets out a method for understanding and assessing heritage significance of views.
Sustainability Appraisal and Strategic Environmental Assessment (2016)	This SEA/SA provides guidance that focuses on key principles required when analysing the historic environment that must be measured for the development of certain Plans and Programmes on the Environment that is also applicable to neighbourhood plans and other documents such as the Local Transport Plans and Water Resource Management Plans.
The Historic Environment in Local Plans Historic Environment Good Practice Advice in Planning: 1 (2015)	This Historic England Good Practice Advice note provides comprehensive steps required for the development of local plans through ascertaining not only the setting of the site, but the 'value to society', to coincide with a strong evidence base that must incorporate the use of local lists, heritage assets, with further consideration of the conservation areas within and outside the site area. The conservation and enjoyment of the historic environment must make a positive contribution, by enhancing the local character and distinctiveness of the area, paying special attention in implementing historic environment legislation the National Planning Policy Framework (NPPF), and the related guidance given in the Planning Practice Guidance (PPG).
Managing Significance in Decision-Taking in the Historic Environment Historic Environment Good Practice Advice in Planning: 2 (2015)	This Historic England Good Practice Advice note provides the key principles required for Managing Significance in Decision-Taking in the Historic Environment, inline with implementing historic environment legislation, the National Planning Policy Framework (NPPF), and the related guidance given in the Planning Practice Guidance (PPG).
The Setting of Heritage Assets Historic Environment Good	The GPA outlines good vital information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic

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Practice Advice in Planning: 3 (2017 Air Quality Strategy (2010) )	environment policy in the National Planning Policy Framework (NPPF) and the related guidance in the National Planning Practice Guide (PPG).
Tall Buildings Historic England Advice Note 4 (2015)	This Historic England Good Practice Advice note provides guided support to all those dealing with proposals for tall buildings in implementing historic environment legislation, the National Planning Policy Framework (NPPF), and the related guidance given in the Planning Practice Guidance (PPG).
Understanding Place: Character and context in local planning, English Heritage (2011)	Sets out case studies for how historic characterisation can be used to inform plan making and development management decisions.
Understanding Place: Conservation Area Designation, Appraisal and Management, English Heritage (2011)	Sets out guidance for managing change in a way that conserves and enhances historic areas through conservation area designation, appraisal and management.
Good Practice for Local Listing Consultation Draft, English Heritage (2011)	Sets out best practice guidance for identifying buildings and structures suitable for local listing and for managing the list.
Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, ICOMOS (2010)	Sets out guidance for producing Heritage Impact Assessments for World Heritage Sites in order to evaluate the impact of potential development on the Outstanding Universal Value. This may also provide a guide for assessing general impact of development on heritage assets and their settings.
National Institute for Health and Clinical Excellence (NICE):Alcohol-use disorders: preventing harmful drinking	The guidance identifies how government policies on alcohol pricing, its availability and how it is marketed could be used to combat such harm. Changes in policy in these areas are likely to be more effective in reducing alcohol-related harm among the population as a whole than actions undertaken by local health professionals.
National Institute for Health and Clinical Excellence (NICE): Prevention of Cardiovascular disease at the population level	The guidance is for government, the NHS, local authorities, industry and all those whose actions influence the population's cardiovascular health (that is, can help keep people's hearts healthy and prevent strokes). The guidance comprises two sets of recommendations aimed at national policy makers and local practitioners respectively. Recommendations 1 to 12 outline a national framework for action. They break new ground for NICE

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	<p>by focusing on legislative, regulatory and voluntary changes – including further development of existing policies. Topics covered include:</p> <ul style="list-style-type: none"> <li>• How to reduce the nation’s consumption of salt, saturated fats and trans fats</li> <li>• How to ensure food marketing and promotions aimed at children and young people do not encourage them to consume high levels of salt, saturated fats and trans fats</li> <li>• Commercial interests</li> <li>• Food product labelling</li> <li>• The European Union’s common agricultural policy</li> <li>• Public sector catering guidelines</li> <li>• Advice on take-aways and other food outlets.</li> </ul>
<p>National Institute for Health and Clinical Excellence (NICE): Preventing unintentional injuries among children and young people aged under 15: road design and modification</p>	<p>This is one of three pieces of NICE guidance published in November 2010 on how to prevent unintentional injuries among under-15s. A second publication covers unintentional injuries in the home and a third covers strategies, regulation, enforcement, surveillance and workforce development. The guidance covers 20 mph limits, 20mph zones and engineering measures to reduce speed or make routes safer. The recommendations include advice on:</p> <ul style="list-style-type: none"> <li>• How health professionals and local highways authorities can coordinate work to make the road environment safer.</li> <li>• Introducing engineering measures to reduce vehicle speeds, in line with Department for Transport guidance.</li> <li>• Making routes commonly used by children and young people safer. This includes routes to schools and parks.</li> </ul>
<p>National Institute for Health and Clinical Excellence (NICE): Promoting physical activity: active play and sport for pre-school and school-age children and young people in family, pre-school, school and community settings</p>	<p>This guidance is for all those who are involved in promoting physical activity among children and young people, including parents and carers. The NICE recommendations give advice on:</p> <ul style="list-style-type: none"> <li>• how to promote the benefits of physical activity and encourage participation</li> <li>• high level strategic planning</li> <li>• the importance of consultation with children and young people and how to set about it</li> <li>• planning and providing spaces, facilities and opportunities</li> <li>• training people to run programmes and activities</li> <li>• how to promote physically active travel such as cycling and walking.</li> </ul>
<p>National Institute for Health and</p>	<p>This guidance offers the first evidence-based recommendations on how to improve the physical</p>

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Clinical Excellence (NICE): Promotion and creation of physical environments that support increased levels of physical activity	<p>environment to encourage physical activity. It is for NHS and other professionals who have responsibility for the built or natural environment. This includes local transport authorities, transport planners, those working in local authorities and the education, community, voluntary and private sectors. The seven recommendations cover strategy, policy and plans, transport, public open spaces, buildings and schools. They include:</p> <ul style="list-style-type: none"> <li>• Ensure planning applications for new developments always prioritise the need for people (including those whose mobility is impaired) to be physically active as a routine part of their daily life.</li> <li>• Ensure pedestrians, cyclists and users of other modes of transport that involve physical activity are given the highest priority when developing or maintaining streets and roads.</li> <li>• Plan and provide a comprehensive network of routes for walking, cycling and using other modes of transport involving physical activity.</li> </ul>
Planning sustainable cities for community food growing (2014)	This guide brings together in one place examples of planning policies around the UK that support community food growing. It is aimed primarily at planning authorities to help them to use food growing as a way of creating healthy communities.
No health without mental health: implementation framework (2012)	The Framework sets out what a range of local organisations can do to implement No Health Without Mental Health, and improve mental health outcomes in their area. It also outlines what work is underway nationally to support this, and how progress will be measured.
Local action on health inequalities: evidence papers (2014)	This research shows the evidence supporting action to reduce health inequalities.
Obesity: working with local communities; NICE guidelines [PH42] (2012)	This guidance aims to support effective, sustainable and community-wide action to prevent obesity. It sets out how local communities, with support from local organisations and networks, can achieve this.
Physical activity: walking and cycling NICE guidelines [PH41] (2012)	This guideline sets out how people can be encouraged to increase the amount they walk or cycle for travel or recreation purposes. This will help meet public health and other goals (for instance, to reduce traffic congestion, air pollution and greenhouse gas emissions).

## Regional

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<b>Air Quality</b>	
Air Quality Strategy (2010)	This strategy sets out a framework for delivering improvements to London's air quality and includes measures aimed at reducing emissions from transport, homes, offices and new developments, as well as raising awareness of air quality issues. Over the last few years, a number of innovative measures have been introduced to help improve air quality in London. Nevertheless, air pollution remains a problem in the capital, as is clear from the fact that European Union targets for air quality standards that were intended to be met in 2004 and 2005 have still not been achieved.
The control of dust and emissions from construction and demolition - Best Practice Guidance (2014)	The GLA and London Councils have produced 'Best Practice Guidance' to control dust and emissions from construction and demolition. The Guidance will be used to inform the planning process within London boroughs; assisting developers in understanding the methods available to them and what London boroughs might expect. The Guidance will be reviewed regularly, in order to update new best practice in dust and emissions management.
<b>Equality</b>	
A Digital Inclusion Strategy for London (2015)	This strategy outlines why digital exclusion is an issue for London and how the Mayor can work with partners to address the barriers people face to getting online. It provides data on the numbers and groups of people that are digitally excluded. It then explains the cost of digital exclusion to the individual, society and the economy. The Mayor is keen to use his office to work with partners to ensure as many Londoners who want to get online, have the opportunity to do so.
Equal Life Chances for All (2015)	The Equal Life Chances for All framework 2014 highlights the Mayor's commitment to tackling inequality; improving life chances, and removing barriers that prevent people from reaching their full potential. The GLA will ensure that equality is mainstreamed into everything the organisation does, including how it obtains goods and services.
Mayors Annual Equality Report 2016/2017	The Mayor's Annual Equality Report 2013/2014 highlights the progress made during the financial year April 2013 to March 2014 towards achieving the GLA's revised equality objectives. It also gives the latest figures and trends for the indicators of progress.
Equal Life Chances for All – Measures Report (2011)	The Equal Life Chances for all Measures report sets out the most recent trends on measures of the delivery of policies and programmes directly under the control of the Mayor and his partners as well as statistical measures outside the Mayor's direct influence.
London's Poverty Profile 2017	Official data from over 100 indicators, revealing patterns in inequality and poverty.

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A Fairer London: The 2019 Living Wage in London	<p>The London Living Wage is an hourly rate of pay, currently set at £10.55. It is calculated independently to reflect the high cost of living in the capital, giving a worker in London and their family enough to afford the essentials and to save.</p> <p>However, organisations must choose to pay their employees the London Living Wage - higher than what they're required to pay by law.</p>
Accessible London: Achieving an Inclusive Environment SPG (2014)	<p>This SPG provides guidance on the implementation of London Plan Policy 7.2 An inclusive environment and of other policies in the Plan with specific reference to inclusive design. It also provides guidance on Lifetime Neighbourhoods to support London Plan Policy 7.1 Building London's neighbourhoods and communities. One of the Mayor's aims for London is that everyone, whether resident, visitor or worker, is able to participate and enjoy all that the city has to offer. To help achieve this aim the London Plan 2011 includes a number of policies which promote an inclusive environment to help ensure that all of London's diverse communities can contribute to London's growing economy and enjoy a high quality of life.</p>
Ending Violence against Women and Girls 2016-2020	<p>This strategy covers the following forms of violence against women and girls:</p> <ul style="list-style-type: none"> <li>• Domestic violence and abuse</li> <li>• Female Genital Mutilation (FGM)</li> <li>• Forced marriage</li> <li>• 'Honour'-based violence</li> <li>• Prostitution and trafficking</li> <li>• Sexual violence including rape</li> <li>• Sexual exploitation</li> <li>• Sexual harassment</li> <li>• Stalking</li> <li>• Faith-based abuse.</li> </ul> <p>This strategy is focused on the needs of women and girls and is a deliberate response to the disproportionate impact of VAWG crimes on women and girls.</p>
Police and Crime Plan 2017-2021	<p>The Police and Crime Plan outlines the Mayor's mission, priorities and objectives for tackling crime and making London safer.</p>
2015 Round Ethnic Group Population Projections	<p>The White population of Greater London is projected to be fairly stable at about 4.9 million over the next decade and increase very slightly thereafter, reaching 5.1 million in 2041. The BAME population of Greater London is projected to increase from 3.3 million in 2011 to 5.2 million in 2041. By the Census year 2011 the Black African population (576 thousand) had surpassed the Indian population (545 thousand) to become the biggest individual BAME ethnic group in Greater London</p>
Hate Crime Reduction Strategy (2014)	<p>The strategy sets out plans to boost confidence across all communities in reporting hate crime, develop ways to prevent offences and reduce repeat victimisation and outlines how agencies can work together to ensure swift and sure justice for victims between 2014-2017. Hate crime is defined as any criminal offence which is perceived, by the victim or any other person, to be motivated by a hostility or prejudice based on a personal characteristic, specifically race, religion/ faith, sexual</p>

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	orientation, disability and transgender identity.
Action Against Hate The UK Government's plan for tackling hate crime – 'two years on' (2018)	The Hate Crime Action Plan, published in 2016, set out a comprehensive four year programme, which focused on five themes: preventing hate crime by challenging beliefs and attitudes; responding to hate crime within our communities; increasing the reporting of hate crime; improving support for victims of hate crime; and building our understanding of hate crime. This report reflects on the success of the plan so far.
London Enriched (2009) and update (2013)	London Enriched is the Mayors refugee integration strategy, setting out a vision for refugee integration in the capital, focusing on the right of refugees to live in dignity and security, sharing with other Londoners the same life chances and opportunities to contribute.
An evidence base on migration and integration in London (2010)	The report begins with a literature and demographic review presenting a picture of migration in London and the key issues around migrant integration. This draws together the state of the academic and policy literature with as recent as possible primary data provided by the GLA and UK Border Agency and original data analysis conducted by COMPAS. The work was conducted over two months in Spring 2010. The report presents the broad contours of the contemporary migration landscape in London, before looking at each of the Mayor's integration strategy core themes in terms of barriers and factors to successful integration and policy implications arising. It concludes with a framework of interventions, noting the policy priorities arising from the evidence for each of the themes.
Planning for Equality and Diversity in London SPG (2007)	<p>This SPG:</p> <ul style="list-style-type: none"> <li>• provides guidance to boroughs, partners and developers on the implementation of policies in the London Plan which relate to equalities issues and addressing the needs of London's diverse communities;</li> <li>• sets out some of the tools for promoting equality and diversity in planning processes;</li> <li>• highlights the spatial impacts of wider socio-economic issues such as poverty and discrimination in the planning context;</li> <li>• sets out overarching principles and the key spatial issues for planning for equality; and examines in greater detail the spatial needs of London's diverse communities and identifies how spatial planning can be used to try and address these</li> </ul>
Responding to the needs of faith communities: Report and evidence (2008)	CAG Consultants with Diverse Ethics and Land Use Consultants were commissioned by the GLA in late 2007 to explore the needs of faith communities in relation to places of worship in London. This document reports on our findings and conclusions from the research and engagement process with faith communities and planning authorities in relation to places of worship in London.

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<b>Culture</b>	
Cultural Metropolis 2014 - The Mayor's culture strategy for London	The Mayor's Cultural Strategy sets out the vision, priorities and recommendations for how to strengthen the cultural life of Londoners across the capital. It recognises the significance of the cultural and creative sectors in making London a successful world city, and puts forward a case for its continued support and investment. It includes an update on the policy achievements and next steps in: Maintaining London's position as a world city of culture, Widening the reach, Education and skills, Infrastructure, environment and the public realm. It provides a recap of the cultural triumphs and cultural legacy from the Games.
Culture on the high street guide 2013	The <i>Culture on the High Street</i> guide will help local authorities, town centre managers and business improvement districts to improve the quality and ambition of culture on our high street.
Working Paper 48: Culture and regeneration - What evidence is there of a link and how could it be measured? (2011)	Despite much research, there have been few comprehensive evaluations of culture-led regeneration schemes and so a good evidence base does not exist. A review of the limited evidence shows mixed results and much uncertainty of the impact of culture-led regeneration. Current evaluation measures are not appropriate for understanding the long-term and dynamic changes that regeneration schemes may cause and instead these schemes should be monitored, focussing on both people and places.
<b>Design and place shaping</b>	
Shaping Neighbourhoods: Character and Context SPG (2014)	<ul style="list-style-type: none"> <li>This guidance sets out an approach and process to help understand the character and context of a place so that its results can inform the planning and design process, and guide change in way which is responsive to individual places and locations. A separate non-technical summary sets out the main messages of the SPG. A supporting list of data and research resources is provided as a living document that will be updated as appropriate.</li> </ul>
Streetscape Guidance: A guide to better London Streets (2009)	The Streetscape Guidance provides advice on improving and managing the Transport for London Road Network (TLRN) and promotes consistency of approach and excellence in design and workmanship. The document highlights relevant policies and guidance, sets out specific design principles and guidelines including a palette of materials and products, and acts as a best practice resource for London boroughs and other partners.
London View Management Framework Supplementary Planning Guidance, Mayor of London (2012)	The London View Management Framework is a key component of the Mayor's strategy to preserve London's character and built heritage. It outlines the policy framework for managing the impact of development on key panoramas, river prospects and townscape views.
<b>Economy</b>	

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London's Economy Today 2019	Regular update on the state of London's economy.
London's Digital Economy (2012)	This report draws together a variety of data sources to highlight London's position in the digital arena. The report looks at uptake and use of digital technologies by businesses and households.
Retail in London: Looking forward (2015)	<p>Through reading the main report you will:</p> <ul style="list-style-type: none"> <li>• Find out how developments such as changing consumer behaviour and technological advances have altered the playing field for London's retailers</li> <li>• See how retailers have adapted by implementing measures such as 'Click-and-Collect' or 'Dark Stores'</li> <li>• Gain an understanding of what these adaptations may mean for the role retail plays in London, ranging from the employment it provides to the land it uses.</li> </ul>
Jobs and Growth Plan (London Enterprise Panel) 2014	<p>It will help to deliver jobs and growth for London through:</p> <ul style="list-style-type: none"> <li>• Skills and employment: to ensure Londoners have the skills to compete for and sustain London's jobs;</li> <li>• Micro, small and medium sized enterprises: to support and grow London's businesses;</li> <li>• Digital creative, science and technology: for the capital to be recognised globally as world leading hub; for science, technology and innovation - creating new jobs and growth; and</li> <li>• Infrastructure: to keep London moving and functioning.</li> </ul>
London Labour Market Projections (2017)	<p>This report outlines GLA Economics' latest employment projections and shows that jobs in London are projected to grow by more than 850,000 by 2036. The report also provides future projections for both the occupations and qualifications of those employed in London.</p> <p>The report looks at the level of turnover in the labour market with the analysis suggesting that just over half a million people left their occupation in London in 2012. The report also considers the projected increase in London's population and considers the extent to which the demand for, and supply of, labour is likely to be in balance in the longer term.</p>
Alcohol Consumption in the nighttime economy (2012)	<p>The night-time economy (NTE) is activity which occurs between the hours of 6pm to 6am and involves the sale of alcohol for consumption on-trade (e.g. bars, pubs and restaurants). This work looks at the most effective ways to mitigate the costs associated with alcohol in the NTE. It is combined with a tool which estimates (currently measurable) pros and cons for each London Local Authority. The policy options assessed cover pricing, licensing, premise design and operations, public realm design, service interventions, and community mobilisation.</p>
Think Night: London's	The Think Night report sets out how London can work better for all Londoners from 6pm to 6am,

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neighbourhoods from 6pm to 6am (2019)	helping people to live their lives more fully. The London Night Time Commission believes that London can provide so much more at night: in neighbourhoods, workplaces, high streets and public spaces.
London's Super Connected City Plan (2012)	London's Super Connected City Plan is ambitious and innovative. It will underpin the capital's aspiration for contiguous ultrafast connectivity, provide the digital infrastructure needed for the new economy and help East London realise its full economic potential. Successful delivery of this plan will be critical to realising the Mayor of London's prime objective: economic growth for London, and job creation for Londoners.
Mayor's Economic Development Strategy for London (2018)	The Mayor's vision is for London to be the best big city in the world. The Economic Development Strategy sets out this vision with respect to the London economy, and how it can be realised. The Mayor's ambitions are for London to be the World Capital of Business, and to have the most competitive business environment in the world; to be one of the world's leading low carbon capitals, for all Londoners to share in London's economic success and for London to maximise the benefits of the 2012 Olympic and Paralympic games.
Economic Evidence base (2010)	This document aims to provide an economic evidence base to support the three Mayoral strategies that have recently been revised (the London Plan, the Economic Development Strategy and the Transport Strategy).
GLA Employment Time Series (2010)	<p>Roger Tym and partners were commissioned by the GLA to produce historic and projected employment data by sector and borough. The objectives are:</p> <ul style="list-style-type: none"> <li>• To provide a sectoral breakdown of both historic employment data and the latest GLA Economics employment projections for London to 2031 using at least the established 'RTP definitions' of Offices, Industry and Other and;</li> <li>• To provide the sectoral breakdown above for all London Boroughs plus sub-totals showing the Central Activities Zone (CAZ), Isle of Dogs (IOD), rest of Inner London, Outer London and the sum Total for London.</li> </ul>
London Office Policy Review (2017) Update	<ul style="list-style-type: none"> <li>• The London Office Policy Review is the most recent in a series of independent reviews of office market trends commissioned by the GLA. It includes robust Monitoring Benchmarks and associated time series data to illustrate key trends and market relationships and their bearing on policy. LOPR 12 includes:</li> <li>• A review of office-based employment projections and office floor space need estimates to inform future alterations to the London Plan</li> <li>• An assessment of the impact of recent economic events on different parts of the London office</li> </ul>

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	<p>market, and those which might be anticipated in the future</p> <ul style="list-style-type: none"> <li>• A review of London Plan town centre office development guidelines and associated policy proposals</li> <li>• An investigation of the 'mega-schemes' identified in LOPR 2009, their implications for office development within the Central Activities Zones, on its fringes, or beyond</li> <li>• Consideration of the potential for conversion of surplus office space to other uses, especially residential, in different parts of London</li> <li>• An overview of hybrid office/industrial buildings, their locational attributes and implications for office, industrial, transport and other policies.</li> </ul>
London Business Survey (2014)	The 2014 London Business Survey is an innovative survey designed by the Office for National Statistics, on behalf of the London Enterprise Panel and the GLA. The survey covers a wide range of topics including the profile of London business, their performance and outlook, workforce, trade, and London as a place to do business.
Land for Industry and Transport SPG (2012)	This draft document sets out proposed guidance to supplement the policies in the 2011 London Plan relating to land for industrial type activities and transport. The SPG provides advice on how to implement these policies, in particular Policy 2.17 on Strategic Industrial Locations, Policy 4.4 on Managing Industrial Land and Premises; and Policy 6.2 on Providing Public Transport Capacity and Safeguarding Land for Transport. Once adopted it will replace the 2004 Industrial Capacity SPG
London Industrial Land Demand (GLA 2017)	This report assesses land demands for various types of industry and the amount of industrial land that London needs to maintain to ensure it continues to function as a successful and sustainable city. There is no definitive guidance as to what is the right amount of industrial land: as London continues to grow there are increasing pressures on all forms of land use activity to demonstrate that they are contributing efficiently to London's needs. Industrial land in London is under particular pressure given the high demand for housing land and the much higher land values that residential development commands compared to industrial.
Understanding the demand for and supply of visitor accommodation in London to 2036	GLA Economics was asked by the Greater London Authority (GLA) London Plan team to update work surrounding the demand for serviced visitor accommodation to see whether the existing London Plan benchmark target (Policy 4.5) for serviced rooms needed revising. The work was to also include an update around the accessibility of serviced visitor accommodation. The first part of this report examines the supply side of the London market. It sets out the best estimate of the current supply of serviced (and non-serviced) visitor accommodation in London. It also looks at the potential growth in

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	supply of visitor accommodation over time (from focusing on the supply side only). The report then moves onto the demand side, illustrating how visitor nights in London have moved over time. It sets out how GLA Economics has gone about projecting visitor nights over time and its central projection for visitor nights. The report finishes with the projection for nights converted into the likely requirement for serviced visitor accommodation over time.
Accessible Hotels in London (2012)	This report was commissioned by Design for London (DfL)/London Development Agency (LDA) and Greater London Authority (GLA) to provide evidence to inform a new London Plan policy on the percentage of accessible hotel bedrooms required to meet demand now and over the next 20 years. A room which is 'accessible' is defined as one which minimises barriers to use for as many people as possible. It is a wider definition than a room being wheelchair accessible as it allows use by people with disabilities other than mobility impairments. Policy and planning requirements have previously been based around the definition of wheelchair accessibility, but this is now considered to be too narrow a definition of disability, as well as being based on an outdated medical model of disability.
Cornered shops: London's small shops and the planning system (2010) and addendum	This report looks at how the planning system, and other initiatives, can provide support for London's small shops and neighbourhood shopping areas. It seeks to identify the benefits of small, local and independent retailers to London; the evidence there is to show that they are under threat; the policies that have been proposed to support small shops; and what progress has been made in implementing them.
Understanding London's Markets (GLA 2017)	This report sets the context for a new, strategic approach to London's markets by the London Markets Board. By drawing on the wide-ranging experience of people working across the sector, it seeks to build a better picture of London's markets. It explores the challenges markets face, the breadth of value they offer, and the opportunities available, and it makes recommendations that will inform the Board's work towards a new markets strategy, to ensure London's markets thrive in the future.
Culture and the night-time economy: Supplementary planning guidance (2017)	This guidance suggests how public authorities and the private and voluntary sectors can work together to support the development of the night time economy in appropriate locations and improve the way they manage its impacts.
London Town Centre Health Check Analysis Report (2018)	The 2017 London Town Centre Health Check is the latest in the ongoing series of strategic London-wide health checks undertaken by the Greater London Authority with support from the London boroughs. It provides a 'snapshot' of the health of over 200 of London's town centres using a selection of strategic health check indicators and illustrates how these have changed over time.
Consumer Expenditure and	Government policy in the National Planning Policy Framework requires the GLA and boroughs to

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Comparison Goods Retail Floorspace Need in London (2017)	assess the overall need for additional floorspace for economic uses, including retail and leisure development. This study assesses the scale and nature of consumer expenditure in London for comparison goods retail, convenience goods retail, and other expenditure including leisure over the period from 2011 to 2036. It focuses on strategic requirements for comparison goods retail floorspace need in London, distributed to boroughs and individual town centres. The project is both current and forward-looking, factoring in major retail pipeline developments in and around the capital and contains three additional scenarios to test alternative spatial patterns of growth and quality.
Accommodating Growth in Town Centres: Achieving Successful Housing Intensification and High Street Diversification (2014)	The 'Accommodating Growth in Town Centres' report assesses the changing nature of retail and the capacity and deliverability of housing intensification in and around town centres, while encouraging a diverse range of enterprises and the spaces they need on High Streets.
Artists' Workspace Annual Data note (GLA 2018)	Study to better understand the picture of affordable studio provision for artists in London. The study is the first step in creating a list of all London's Artist Studios on the Mayor's 'London.Gov' website
Supporting Places of Work: incubators, accelerators and co-working spaces (2014)	The GLA appointed URS, Ramidus, #1Seed and Gort Scott to carry out research into the supply of existing Incubators, Accelerators and Co-working (IAC) spaces in London, which was the first study into the emerging sector of this kind. The report recommends the creation of a workspace provider network, through which IACs can inform emerging workspace policies, share learnings, and engage with boroughs and developers. The report also recommends the creation of an online interactive map to make IAC spaces visible to Londoners. The report concludes that any future public sector investment should focus on IACs with clear community outreach goals (e.g. providing training for disadvantaged groups, providing subsidised workspace) as well as being combined with wider initiatives to maximise public outcome.
Cross River Partnership business plan (2019)	Cross River Partnership (CRP) is a public-private partnership that was originally formed to deliver cross-river infrastructure projects such as the Millennium Bridge. CRP has since diversified to deliver a wide range of externally-funded, multi-partner regeneration projects.
Town Centres SPG (2014)	This SPG provides guidance on the implementation of London Plan Policy 2.15 Town centres and of other policies in the Plan with specific reference to town centre development and management. It also provides guidance on Policy 2.16 Strategic Outer London Development Centres and their potential to be developed as business locations with distinct strengths of greater than sub regional importance. To support the policies in the London Plan this SPG includes guidance on: <ul style="list-style-type: none"> <li>• Supporting the evolution and diversification of town centres</li> </ul>

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	<ul style="list-style-type: none"> <li>• Delivering mixed use housing intensification</li> <li>• Quality matters</li> <li>• Promoting Accessibility and Connectivity</li> <li>• Town centre regeneration and initiatives</li> <li>• Proactive town centre strategies</li> <li>• Strategic Outer London Development Centre implementation guidelines</li> </ul>
The Mayor's Action for High Street (2014)	It also outlines what the Mayor and his staff will do to help high streets, including how to diversify and grow and the support on offer from the Mayor's regeneration team. It makes the case for investment and how the Mayor will lobby to protect the future of London's high streets.
<b>Energy and Climate Change</b>	
Delivering London's Energy Future: the Mayor's climate change mitigation and energy strategy (2011)	Delivering London's Energy Future is the Mayor's climate change mitigation and energy strategy. It sets out his strategic approach to limiting further climate change and securing a low carbon energy supply for London. To limit further climate change the Mayor has set a target to reduce London's CO <sub>2</sub> emissions by 60 per cent of 1990 levels by 2025. Delivering London's Energy Future details the programmes and activities that are ongoing across London to achieve this.
Managing risks and increasing resilience: the Mayor's climate change adaptation strategy (2011)	Managing risks and increasing resilience is the Mayor's climate change adaptation strategy for London. It details his strategic approach to managing the climate risks we face now and in the future in order to maintain London as one of the best big cities in the world.
Climate Change Adaption Strategy for London (2010)	<p>The Mayor's Climate Change Adaptation Strategy:</p> <ul style="list-style-type: none"> <li>• identifies who and what is most at risk today</li> <li>• analyses how climate change will change the risk of flood, drought and heatwave through the century</li> <li>• describes what action is needed to manage this and who is responsible for it.</li> </ul> <p>The key actions proposed in the strategy are:</p> <ul style="list-style-type: none"> <li>• To improve our understanding and management of surface water flood risk</li> <li>• An urban greening programme to increase the quality and quantity of greenspace and vegetation in London – this will buffer us from floods and hot weather</li> <li>• To retro-fit up to 1.2m homes by 2015 to improve the water and energy efficiency of London homes</li> </ul>
Decentralised Energy Capacity Study (2011)	This publication is formed of three reports providing data on, and analysis of, the potential for renewable and low carbon energy in London. This regional assessment breaks down the types of energy that can

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	contribute to the Mayor's target to supply 25 percent of London's energy from decentralised sources by 2025.
London Environment Strategy (2018)	This brings together approaches to every aspect of London's environment in one strategy with the overall aim of improving London's environment for all.
<b>Flood Risk</b>	
Thames Region Catchment Flood Management Plan, 2009	This plan presents what the Environment Agency considers the most sustainable direction for the management of fluvial flood risk within the region for the next 50 to 100 years. It is based on extensive research into the catchment characteristics of the region and the options available for managing the risk to people, properties and the environment. It takes into account the likely impacts of climate change and the plans for future development.
Regional Flood Risk Appraisal (2009)	In June 2007 the Mayor published the draft Regional Flood Risk Appraisal (RFRA) for the London Plan, for public consultation. The RFRA examines the nature and implication of flood risk in London and how the risk should be managed.
<b>Health and well-being</b>	
Individual well-being in London (2014)	Over the past four years, the UK Government has sought to understand the subjective well-being of individuals as an alternative measure of the relative 'health' of a country compared to traditional measures such as GDP. This analysis presents findings for London and examines variations in how individuals assess their own well-being according to a number of different personal characteristics. Among those characteristics exhibiting the largest levels of variation in well-being are qualification level, health and disability status, along with some variation seen across different age and ethnic groups.
London Mental Health: The invisible costs of mental ill health (2014)	This report aims to, where possible, quantify the impact of mental ill health in London in order to highlight the scale of the problem. It does this through analysing the wider economic and social impacts of mental ill health. As such the measurement and quantification of the costs of mental ill health go beyond usual measures of economic output, or Gross Value Added (GVA) to consider, amongst other things, so-called 'non-market' impacts, for instance the impact on individuals' quality of life from mental ill health. The intention is for this to provide for a more 'all-encompassing' measure of the economic and social costs of mental ill health to London.
The London Health Inequalities Strategy (2018)	The London Health Inequalities Strategy sets out the Mayor's commitments to work with partners to: 1 Promote effective parenting, early years development, young people's emotional health and

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	<p>readiness for learning</p> <p>2 Motivate and enable Londoners to adopt healthier behaviours and engage in lifelong learning</p> <p>3 Build knowledge about health and wellbeing, tackling stigma and taboo in the process</p> <p>4 Promote community development approaches to improve health, and actively support the role of the third sector</p> <p>5 Build public sector capacity to engage more effectively with individuals, communities and the Voluntary and Community Sector (VCS).</p>
The London Health Inequalities Strategy (2018)	The vision and aims set out in this strategy are derived from an analysis of health inequalities in London, including the variation in healthy life expectancy. It has been further informed by an integrated impact assessment, and the large response to the public consultation on the draft strategy in 2017. Five key aims have been identified to tackle inequalities and achieve the Mayor's vision in London over the next ten years.
The London Health Inequalities Strategy: First Steps to Delivery (2012)	This 'First Steps to Delivery' plan sets out the actions prioritised to 2012 against the thirty high-level commitments which form the bedrock of the strategy.
Takeaways Toolkit: Tools, interventions and case studies to help local authorities develop a response to the health impacts of fast food takeaways (2012)	<ul style="list-style-type: none"> <li>• Takeaways may be good for London's economy, but they're often bad for Londoners' health. To help London boroughs balance these conflicting priorities and understand the options available when considering the health impacts of fast food, we've created a 'takeaways toolkit'. The toolkit has three main recommendations for boroughs:</li> <li>• <b>making food healthier</b> – working with takeaway businesses and the food industry to make healthier fast food.</li> <li>• <b>starting them young</b> – schools should have strategies to reduce the amount of unhealthy food children eat at lunch and on their journey to and from school.</li> <li>• <b>planning for health</b> – use regulatory and planning measures to address the proliferation of hot food takeaway outlets.</li> </ul>
Health: Children and Young People (2010)	Health: Children and Young People is the second report in the Focus on London 2010 series. This chapter, authored by the London Health Observatory, provides recent evidence on the health experience of children and young people in London. The report includes data about the Local Index of Child Wellbeing, infant mortality, breastfeeding, immunisation, injury, childhood obesity, physical activity, diet, smoking, alcohol consumption, drug use, teenage conceptions and sexual health. It reveals many areas of inequality within the city, but also highlights the ways in which London's

Plan, Strategy or Programme	Summary of objectives and targets
	children are doing well.
Sporting Future: A New Strategy for an Active Nation (2015)	<p>This plan is about increasing participation in sport and physical activity. It aims to deliver a grass-roots sporting legacy for Londoners from the 2012 Olympic and Paralympic Games by:</p> <ul style="list-style-type: none"> <li>• securing a sustained increase in participation in sport and physical activity amongst Londoners</li> <li>• using sport to assist in tackling social problems including ill health, crime, academic underachievement and lack of community cohesion.</li> </ul>
Our Healthier South East London (2014)	Our Healthier South East London is a five year commissioning strategy which aims to improve health, reduce health inequalities and ensure all health services in south east London meet safety and quality standards consistently and are sustainable in the longer term.
NHS London: A Call to Action (2014)	This builds on NHS England’s national Call to Action document published in July, which set out a case that the NHS must transform in order to continue to deliver the best care to those who need it.
Better Health for London: Next Steps (2015)	The Mayor of London, NHS England (London), Public Health England, London Councils and the 32 GP-led clinical commissioning groups have come together to outline how, individually and collaboratively, they will work towards London becoming the world’s healthiest major city.
<b>Heritage</b>	
English Heritage’s Heritage at Risk- London (2017)	The Register identifies which heritage assets are at risk from development pressures, neglect or decay. It also monitors the changing condition of assets in order to help us prioritise where resources and expertise can best be deployed to resolve the problems. It also includes listed buildings and scheduled monuments, Conservation Areas, Registered Parks and gardens.
The National Heritage List for England	The Register identifies all registered heritage assets including listed buildings, scheduled monuments, protected wreck sites, registered parks and gardens, registered battlefields, world heritage sites, applications for certificates of immunity (COIs) and current building preservation notices (BPNs).
London World Heritage Sites - Guidance on Settings (2012)	<p>The London Plan sets out policies to conserve and enhance London’s World Heritage Sites and their settings, and states that the Mayor will produce guidance on defining the settings of London’s World Heritage Sites. There are four World Heritage Sites and one potential site on the Tentative List in London:</p> <ul style="list-style-type: none"> <li>• Palace of Westminster and Westminster Abbey, including St Margaret’s Church</li> <li>• Tower of London</li> <li>• Maritime Greenwich</li> <li>• Royal Botanic Gardens, Kew</li> <li>• Darwin Landscape Laboratory (Tentative List)</li> </ul>

Plan, Strategy or Programme	Summary of objectives and targets
	Each has been designated because of its outstanding universal value of international significance. The sites themselves are set in a very dynamic, complex urban environment in which pressure for development is high. However one of the things that makes London distinctive is the way it combines old and new, protecting heritage but encouraging change. The Mayor has brought forward guidance on how this dynamic relationship can be managed in ways that protect the value of the sites and whilst also allowing the city to grow and change around them
<b>Housing</b>	
Housing supplementary planning guidance (2016)	The SPG provides guidance on how to implement the housing policies in the 2011 London Plan. In particular, it provides detail on how to carry forward the Mayor's view that "providing good homes for Londoners is not just about numbers. The quality and design of homes, and the facilities provided for those living in them, are vital to ensuring good livable neighborhoods". It is informed by the Government's National Planning Policy Framework and by its Housing Strategy for England.
London Housing Strategy (2018)	The Mayor's strategy aims to put in place the resources to deliver more than 42,000 new homes a year, but achieving this ambition will require the full commitment of the London boroughs, of government, and of private and public sector developers. The Mayor believes that only by working together can we agree a long-term financial settlement with national government, free up local councils to build, promote institutional investment in new housing, bring forward surplus public land and develop Housing Zones across the capital to drive delivery. The strategy also aims to make sure that the homes we build better reward those who work hard to make this city a success – by massively increasing opportunities for home ownership, by improving the private rented sector and by ensuring working Londoners have priority for affordable homes to rent.
Housing in London (2018)	Housing in London is the evidence base for the Mayor's London Housing Strategy, summarising key patterns and trends across a wide range of topics relevant to housing in the capital.
GLA Housing Design Guide Interim edition (2010)	The new 'interim edition' of the London Housing Design Guide sets out the Mayor of London's aspirations for the design of new housing in the capital. The Mayor is committed not just to delivering more homes in London, but also to improving the quality of our homes. The London Development Agency has published the new London Housing Design Guide, which sets a new benchmark for housing design in London. All housing built on London Development Agency land is expected to meet these standards. The standards will also start to be applied to housing schemes applying for funding from the London Homes and Communities Agency from April 2011.
South East London Housing	Cobweb were commissioned by local authorities in South East London to undertake a Strategic

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Market Assessment (2014) and sub reports	Housing Market Assessment (SHMA) for the sub region. The local authorities involved in the project are Bexley, Bromley, Greenwich, Lewisham and Southwark. A SHMA is a framework that local authorities and regional bodies can follow to develop a good understanding of how housing markets operate.
The Private Rented sector in South East London and Lambeth (2014)	<p>The aim of the research was threefold:</p> <ul style="list-style-type: none"> <li>• To complement the South East London Strategic Housing Market Assessment (SHMA) that had been undertaken recently, by providing evidence and analysis of the PRS that would not be available or achievable through the ‘desk top’ SHMA.</li> <li>• To provide some of the evidence base that boroughs will need to draw on if considering introduction of licensing in the PRS.</li> <li>• To enable boroughs to better target interventions in the PRS, in terms of both enforcement and procurement (e.g. for use as temporary accommodation or for the prevention of homelessness).</li> </ul>
The role of the planning system in delivering housing choices for older Londoners (2012)	This study is a ‘think piece’ to look specifically at the role of the planning system in helping to ensure that older Londoners have a choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in high quality environments. A policy for older Londoners will be a key input to a wider policy development process across London. The research set out to provide estimates of the future demand for and supply of specialist housing for older Londoners and to identify the challenges and potential barriers to delivery. Methods included modelling supply and demand, analysis of borough policies and practice and an extensive review of existing research.
GLA 2019 Round Population Projections	Detailed ward level population projections to support the London Plan. Incorporating housing provision targets as outlined in the consultations draft of the revised London Plan
Barriers to Housing Delivery (Update 2014)	In 2012 The GLA asked Molior London to produce a report called ‘Barriers to Housing Delivery in London’. The report’s purpose, broadly, was to find out why developers in London were not building more homes for private-sale. The report’s conclusion was, broadly, ‘they are building more homes for private sale than you think’. Molior London was asked to update that report. This time the brief might be simplified as ‘the stock of unbuilt private-sector planning permissions in London is significant –so why aren’t we hitting housing delivery targets?’. This report’s conclusion can be summarised as ‘big schemes in London are commencing units in line with the numbers required to meet housing need’.
London Student Housing Requirements Study (2007)	BBP Regeneration, SQW Ltd., Tribal Consulting, and Opinion Research Services undertook a study in 2006 to assess the impact that growth in the Higher Education (HE) sector may have on housing requirements and housing markets in Greater London. The primary aim of this research was to inform

Plan, Strategy or Programme	Summary of objectives and targets
	<p>the implementation of London Plan and borough policy. The study incorporates a policy review, an analysis of baseline data on London's student population and student accommodation, and primary research. The data has been used to help forecast future student population growth and accommodation needs and the potential impact of the HE sector on London's economy, followed by a number of recommendations.</p>
<p>Mayor's Academic Forum Recommendations Paper – student housing (2014)</p>	<ul style="list-style-type: none"> <li>• The Mayor's Academic Forum was established through the 2011 London Plan particularly to support implementation of Policy 3.8 Bh, which recognises that specialist student provision could give rise to concerns over:</li> <li>• the loss of capacity for conventional homes, especially affordable family housing;</li> <li>• the need to secure mixed and balanced communities;</li> <li>• the scope for identifying land suitable for student accommodation; and,</li> <li>• the way these issues are expressed in parts of inner London “<i>where almost three quarters of the capacity for new student accommodation is concentrated</i>”.</li> </ul> <p>The <i>Mayor's Academic Forum Recommendations Paper – student housing</i> is the first report of the Mayor's Academic forum to the Mayor, focusing on strategic planning issues for student housing. Its main recommendations have been reflected in FALP paragraphs 3.52, 3.53a and 3.53b.</p>
<b>Infrastructure</b>	
<p>Draft London Infrastructure Plan 2050 (2014)</p>	<p>The document sets out what infrastructure London requires. It is the first ever strategic attempt to set out London's infrastructure needs, how much it might cost and how we pay for our needs. The aim is to prepare for, and benefit further from, London's growth: bringing fresh thinking into the city's infrastructure needs now, in order to meet them more costs effectively in the long term.</p>
<p>MOPAC/MPS Estates Strategy 2013-16</p>	<p>Linked to the Police and Crime Plan is the new MOPAC/MPS Estates Strategy 2013-16, see below. Following consultation on local policing and public access in January-March 2013, further work was undertaken to finalise plans for the wider police estate and the final version of this strategy is available below.</p>
<p>Central London Infrastructure Study (2009)</p>	<p>The study aims to provide a strategic understanding of the implications of growth for the whole of Central London, with an indication of how growth, and therefore demand for infrastructure, is distributed across the study area. This analysis allows Central London Forward to build a robust case for additional infrastructure investment for Central London to achieve sustainable growth up to 2026. In particular, as well as offering local authority level information and analysis, the report provides evidence of sub-regional issues and opportunities, encouraging joint solutions wherever appropriate.</p>

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Community Infrastructure Charging Schedule – Mayor of London (2017)	<p>This study also identifies existing gaps and shortfalls in infrastructure provision.</p> <p>Sets out the level of charge that will apply to certain types of new development across London in order to deliver the Crossrail programme.</p>
Crossrail Funding: Use of Planning Obligations and the Mayoral Community Infrastructure Levy (2016)	<p>This SPG sets out guidance on implementation of London Plan policies on the funding of Crossrail, planning obligations and the Community Infrastructure Levy (CIL).</p>
Social Infrastructure SPG Implementation Framework (2015)	<p>Social infrastructure includes a wide range of services and facilities, including health, education, community, cultural, play, recreation and sports facilities, faith, emergency facilities and many other local services and facilities that contribute to quality of life.</p> <p>The draft guidance;</p> <ul style="list-style-type: none"> <li>• Gives a range of information sources to evaluate need for social infrastructure at the strategic planning level, starting with the GLA’s own demographic projections and the ways in which these can be used to understand need for health, education and sports facilities.</li> <li>• Emphasises the need for planning across services to ensure the efficient and timely delivery of social infrastructure in a way the meets the broader built environment aims of the London Plan.</li> <li>• Describes Department of Health models for service delivery in a way that should help planners and health professionals to communicate with each other.</li> <li>• Sets specific targets for the provision of burial space based upon projections of need and survey of existing capacity set out in the 2011 Audit of London Burial Provision.</li> <li>• Provides a comprehensive range of resources for the assessment of social infrastructure need arising from individual applications.</li> </ul>
<b>London Plan</b>	
<p>London Plan (2016)</p> <p>(The New London Plan is due to be adopted in 2020. Once adopted, this will supersede the London Plan (2016))</p>	<p>The London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2036. It forms part of the development plan for Greater London. London boroughs’ local plans need to be in general conformity with the London Plan, and its policies guide decisions on planning applications by councils and the Mayor.</p>

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London Implementation Plan (2013)	<ul style="list-style-type: none"> <li>• The Implementation Plan is intended to:</li> <li>• facilitate effective coordination and cooperation of activities to ensure the realisation of the London Plan</li> <li>• inform developers and all delivery partners who need to understand the envisaged implementation actions and strategic infrastructure provision in relation to the London Plan</li> <li>• provide communities with transparent and accessible information to enable them to get involved in the development of their area</li> <li>• help boroughs in terms of the wider context for their local implementation and infrastructure planning and the preparation for their Community Infrastructure Levy (CIL).</li> </ul> <p>The Plan will be updated regularly.</p>
London Planning Statement (2014)	<p>The NPPF revoked Government Office for London Circular 1/2008 which “provided advice and guidance on the arrangements for strategic planning in London”. The Mayor considers that it is helpful for him to fill the gap this leaves with a document that provides some information about his planning functions, and the way in which he intends to carry them out. This document is intended to be helpful to anyone concerned with planning in London, including boroughs, specialist agencies, developers, amenity and voluntary groups, individual neighbourhoods and Londoners. It:</p> <ul style="list-style-type: none"> <li>• sets out some general principles of fundamental importance to the planning system in London;</li> <li>• explains the Mayor’s part in London’s planning system, both in preparing strategic planning policy through his spatial development strategy (or “London Plan”) and in the taking of planning decisions about strategic developments;</li> <li>• highlights the issues that the Mayor considers are particular priorities for the London planning system and which he thinks it is helpful to draw to the attention of others; and</li> <li>• sets out the Mayor’s intended programme of planning-related work for the next four years.</li> </ul>
<b>Noise</b>	
London Agglomeration Noise Action Plan (2010)	<p>The purpose of the Noise Action Plan is to assist in the management of environmental noise and its effects, including noise reduction if necessary, in the context of government policy on sustainable development. Noise Action Plans are based on the results of the strategic noise maps published in 2008.</p>
Sunder City: The Mayor’s Ambient Noise Strategy (2004)	<p>The aim of the Mayor’s ambient noise strategy is a practical one – to minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practices and</p>

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	<p>technology within a sustainable development framework.</p> <p>Three key issues are:</p> <ol style="list-style-type: none"> <li>1. Securing good noise reducing road surfaces</li> <li>2. Securing a night aircraft ban across London</li> <li>3. Reducing noise through better planning and design of new housing.</li> </ol>
<p><b>Open Space, Biodiversity, Geodiversity</b></p>	
<p>A Manifesto for Public Open Space: London's Great Outdoors (2009)</p>	<p>London's Great Outdoors recognises that investment in public space enhances the look and feel of the city, making it a more healthy and pleasant place for residents and visitors and an environment in which businesses can thrive. It contributes to maintaining and improving London's image as the world's most green and liveable big city and highlights London's offer as a city that can sustain economic growth.</p>
<p>Open Spaces Strategies: Best Practice Guidance (2008)</p>	<p>This document provides guidance on how to create an open space strategy. Drawing on the lessons learnt from 5 years of CABE Space strategic enabling support with local authorities across England, it updates earlier CABE Space guidance, (<i>Green space strategies: A good practice guide</i>, 2004), and combines this with an update of the guidance for London, (<i>Mayor's guide to preparing open space strategies; Best practice guidance of the London Plan</i>, 2004), to provide one comprehensive guide for England.</p>
<p>Connecting with London's Nature. The Mayor's Biodiversity Strategy (2002) Updated draft 2015</p>	<p>The document details the Mayor's vision for protecting and conserving London's natural open spaces. It seeks to ensure that there is no overall loss of wildlife habitats in London, and that open spaces are created and made accessible, so that all Londoners are within walking distance of a quality natural space. The strategy is an important step in establishing a London-wide framework for maintaining London's diversity of wildlife.</p>
<p>Preparing Borough Tree and Woodland Strategies SPG (2013)</p>	<p>The Preparing Borough Tree and Woodland Strategies Supplementary Planning Guidance, a joint publication with the Forestry Commission, has been published. It sets out an approach to trees and woodland that:</p> <ul style="list-style-type: none"> <li>• Covers the audit, protection and management of trees and woodland in line with Policy 7.21 of the London Plan</li> <li>• Highlights the asset value of trees and woodland, both in financial terms and the broad range of economic and environmental benefits they provide</li> <li>• Considers all the trees in a borough as a single unified resource – an 'urban forest'</li> </ul>

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	<ul style="list-style-type: none"> <li>• Extends the concept of an 'urban forest' across boundaries so that the cumulative benefits of trees to Londoners can be enhanced</li> <li>• Takes a step by step approach to the management of trees and woodland.</li> </ul>
All London Green Grid SPG 2012	The SPG aims to promote the concept of green infrastructure, and increase its delivery by boroughs, developers, and communities, by describing and advocating an approach to the design and management of green and open spaces to deliver hitherto unrealised benefits. These benefits include sustainable travel, flood management, healthy living, and creating distinctive destinations; and the economic and social uplift these support.
Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)	This SPG aims to help those involved in planning local neighbourhoods to engage with young Londoners to deliver real improvements in the quality of play spaces. The Mayor wants to see a child-friendly London with inclusive, accessible, and safe play spaces that allow all young Londoners to engage in fun, positive, and healthy play and recreation in their own communities and throughout London. The 2012 SPG adds further guidance to the previous 2008 SPG, in particular expanding on the concept of lifetime neighbourhoods.
London's Foundations SPG (2012)	<p>London's Foundations (2009) was a joint publication with Natural England setting out London's geological heritage, explaining the process for identifying sites of national, regional and local geological importance, identifying important geological sites for protection and advising boroughs on how to promote as well as protect geodiversity. It has been updated to reflect:</p> <ul style="list-style-type: none"> <li>• The publication of the 2011 London Plan;</li> <li>• The emerging advice of the Government in its National Planning Policy Framework;</li> <li>• The ongoing work of the London Geodiversity Partnership (LGP) in updating the number of sites that should be promoted/protected by boroughs via their development plan documents;</li> <li>• The publication by the LGP of their Geodiversity Action Plan.</li> </ul>
<b>Sustainability</b>	
Sustainable Design and Construction. Mayor's Supplementary Planning Guidance (2014)	This SPG provides guidance on what measures developers can include in their building designs and operations to achieve the carbon dioxide and water consumption targets set out in the London Plan. It also provides guidance on how boroughs can take forward the new approaches set out in the London Plan, such as carbon-dioxide off-setting, retrofitting and 'air quality neutral'.
Adapting to Climate Change: A checklist for development (2005)	This guidance on designing developments in a changing climate was published by the Greater London Authority. The main actions are summarised in a simple to use checklist, however, it is not intended to be a design manual, although it does contain signposts to more detailed guidance.

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Sustainable Development Framework for London. London Sustainable Development Commission (June 2003)	<p>This Framework has been developed by the London Sustainable Development Commission, appointed by the Mayor in May 2002 to advise on sustainability issues in the capital. It is the first Sustainable Development Framework for London. It sets out a Vision for the capital and a set of objectives to guide decision making.</p> <p>The Framework should be used to:</p> <ul style="list-style-type: none"> <li>-provide the context for policy development and decision-making;</li> <li>-undertake sustainability appraisals of projects, plans and strategies;</li> <li>-monitor progress towards a more sustainable city</li> </ul>
Sustainable Communities Plan for London: Building for the Future (2003)	<p>This document is part of a national programme of action setting out how the Government intends to achieve sustainable communities in London. The main challenges for London are to accommodate growth and to reduce poverty and deprivation. To do this, the main aims are for more and better-designed and affordable homes, including homes for key workers. To improve public transport and other infrastructure to support the development of new and growing communities; to raise education standards and skill levels across the capital; to tackle crime, anti-social behaviour and the fear of crime.</p>
<b>Transport</b>	
Mayor's Transport Strategy (2018)	<p>The Mayor's Transport Strategy is a statutory document, developed alongside the London Plan and Economic Development Strategy as part of a strategic policy framework to support and shape the economic and social development of London over the next 20 years. It sets out the Mayor's transport vision and describes how Transport for London (TfL) and its partners, including the London boroughs, will deliver that vision. Six goals set out how the overarching vision should be implemented. The transport strategy should:</p> <ul style="list-style-type: none"> <li>• Support economic development and population growth</li> <li>• Enhance the quality of life for all Londoners</li> <li>• Improve the safety and security of all Londoners</li> <li>• Improve transport opportunities for all Londoners</li> <li>• Reduce transport's contribution to climate change and improve its resilience</li> <li>• Support delivery of the London 2012 Olympic and Paralympic Games and its legacy</li> </ul>
Land for Industry and Transport SPG (2012)	<p>The SPG provides an update of previous Mayoral guidance, setting out how boroughs should make effective, efficient use of land for transport purposes.</p>
River Action Plan (2013)	<p>This plan outlines a number of specific measures to be taken by TfL and other stakeholders to help</p>

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	boost the number of river trips in line with achieving the Mayor's target of 12 million passenger journeys a year by 2020
Cycling Revolution London (2010)	The Strategy sets out the vision and policies for encouraging and enabling more cycling across London. The strategy sets out an aspiration to increase cycling by 400% by 2026 through a range of initiatives including the delivery of a series of cycle superhighways, improved cycle safety and an increase training aimed at cyclists
The Mayor's Vision for Cycling (2015)	<ul style="list-style-type: none"> <li>• The Mayor's Vision for Cycling document sets out how this will be achieved, focusing on four key outcomes: <ol style="list-style-type: none"> <li>1. A Tube network for the bike. London will have a network of direct, joined-up cycle tracks, with many running in parallel with key Underground, rail and bus routes.</li> <li>2. Safer streets for the bike. Spending on the Better Junctions programme will be significantly increased and substantial improvements to the worst junctions will be prioritised. With government help, a range of radical measures will improve the safety of cyclists around large vehicles.</li> <li>3. More people travelling by bike. We will 'normalise' cycling, making it something anyone feels comfortable doing.</li> <li>4. Better places for everyone. The new bike routes are a step towards the Mayor's vision of a 'village in the city', with more trees, more space for pedestrians and less traffic.</li> </ol> </li> </ul>
An Electric Vehicle Delivery Plan for London	The EV Delivery Plan sets out a comprehensive strategy to stimulate the market for electric vehicles in London.
Your Accessible Transport Network (2015)	Mayor of London's commitment to make it easier for people to travel around London.
Improving the Health of Londoners: Transport Action Plan (2014)	A Health Action Plan to improve the health of the population by examining the links between health and public transport and improving people's health through transport interventions and strategies. The document is reviewed regularly and updates are provided by TfL.
<b>Waste</b>	
London's Wasted Resource: The Mayor's Municipal Waste Management Strategy	London's Wasted Resource sets out the Mayor's policies and proposals for reducing the amount of municipal waste produced, increasing the amount of waste reused, recycled or composted, and generating low carbon energy from waste remaining. This strategy also sets out how the Mayor, through the London Waste and Recycling Board, will help develop more waste management infrastructure in London.

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Making Business Sense of Waste: The Mayor's Business Waste Management Strategy	Making Business Sense of Waste is the first Mayoral strategy for London's business waste. It sets out initiatives to help all kinds of London's businesses, from shops, restaurants, office buildings, manufacturers to construction companies to save money and reduce harm to the environment through better waste management.
London Waste Apportionment Study (2006) – updated in 2007 and further sensitivity testing	Subsequent to the reiteration of the apportionment, published in December 2006, further data of relevance to criteria within the model has become available. The update includes <ul style="list-style-type: none"> <li>• correct data on safeguarded wharves,</li> <li>• revision of current licensed waste management capacity in London resulting from the decision on the development of the Belvedere facility, updated, recently verified and soon to be published data on indicative capacity of land for waste, logistics and other industrial used in London, provided by the GLA.</li> </ul>
London Remade Demolition Protocol Report (2005)	This describes how demolition recyclate can be recovered with maximum value and how this can be provided as a high quality recycled material in new builds.
<b>Water</b>	
Securing London's Water Future (2011)	The draft London Water Strategy is intended to complement the plans and strategies of other organisations by presenting a London-specific view of managing water resources. At a time of decreasing supply and increasing demand for water we need to use the water we have more wisely. The strategy promotes increasing water efficiency and reducing water wastage to balance supply and demand for water, safeguard the environment and help tackle water affordability problems. It also sets out how the Mayor will help communities at risk of flooding to increase their resilience to flooding
Environment Agency Thames Estuary 2100 plan	This document provides regional guidance on the predicted effects of climate change in relation to tidal flood risk
Water for Life and Livelihoods: Thames River Basin District River Basin Management Plan (2015)	This document sets out the: <ul style="list-style-type: none"> <li>• current state of the water environment</li> <li>• pressures affecting the water environment</li> <li>• environmental objectives for protecting and improving the waters</li> <li>• programme of measures, actions needed to achieve the objectives</li> <li>• progress since the 2009 plan.</li> </ul> It also informs decisions on land-use planning because water and land resources are closely linked.
Taking Care of Water- Our Plan	Taking care of water describes a long-term strategy to address a series of issues. It is built around the

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for the next 25 years (Thames Water Utilities ) 2015-2040	four main themes that have emerged from public consultation: delivering for customers; planning for a sustainable future; delivering efficiently; and providing affordable services. The document set out the things that are needed to meet the challenges of the future. It also set out the costs of providing those services and the likely impact on bills.
Water Resources Management Plan (Thames Water Utilities) 2015-2040.	Sets out how demand for water is balanced against the supply over the next 25-year period.
Our Plans for Water (Thames Water Utilities) 2020-2025	A five-year Plan which sets out proposals to maintain and improve services during the period 2020 to 2025.
Drought Plan (2017) (Thames Water Utilities)	The Drought Plan sets out the actions to take in the event of a drought to maintain essential supplies of water while protecting the environment.
Draft Strategic Proposals for Sludge Management (Thames Water Utilities) 2008	Thames Water Utilities Ltd. (Thames Water) has developed high-level strategic proposals for sludge management/disposal in our region for the 25 years to 2035. The decision to carry out the strategy development was taken for the following reasons: (1) to provide a broad framework for the specific investment proposals, particularly in the period 2010-2015 for the periodic review of our charges in 2009, and (2) to review the appropriateness of the current strategy (i.e. wherever possible recycle sludge to land) going forward, given the increasing costs and regulatory/other constraints arising from this outlet.
Thames Corridor Catchment Abstraction Management Strategy (CAMS)	This guidance on designing developments in a changing climate was published by the Greater London Authority in November 2005. The main actions are summarised in a simple to use checklist, however, it is not intended to be a design manual, although it does contain signposts to more detailed guidance.
Sustainable Remediation Forum UK (SuRF-UK) (2010)	This document presents the first phase of work by the UK Sustainable Remediation Forum (SuRF-UK), which is a framework for assessing the sustainability of soil and groundwater remediation, and for incorporating sustainable development criteria in land contamination management strategies. It helps assessors to identify the optimum land and/or groundwater remediation strategy and/or technique.

## **LOCAL**

<b>Policy or Plan</b>	<b>Summary of objectives and targets</b>
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<b>Policy or Plan</b>	<b>Summary of objectives and targets</b>
<b>Community</b>	
The Council Plan 2014/15 to 2017/18	The Council Plan is the council's overarching business plan. A Council Plan for 2014/15 to 2017/18 was agreed by Cabinet in July 2014. The council plan describes how we will deliver our fairer future vision through the promises and commitments that we have made to the people of Southwark. It also makes a number of commitments to equality and fairness in line with our approach to equality.
Children and Young People's Plan 2013-2018	This strategy provides a plan for all local services affecting children and young people in Southwark. The aims in the next three years are: improved literacy and numeracy; more things to do; less crime against children and young people; fewer teenagers getting pregnant; and a reduction in the rate of increase of children who are obese.
Southwark Primary and Community Care Strategy 2013-2018	This plan describes Southwark Clinical Commissioning Group's intentions to build strong local services to meet the challenges of improving care over the next five years. It supports a range of our other plans and priorities as well as reflecting national policies and thinking on the best way to ensure that primary and community care services are fit for the future.
Southwark Statement of Community Involvement (2019)	The Statement of Community Involvement (SCI) sets out how and when Southwark Council involve the community in the alteration and development of town planning documents and applications for planning permission. This ensures there is effective community involvement in the planning process.
Safer Southwark Partnership Action Plan (2013-2015)	The Safer Southwark Partnership (SSP) has agreed minimum standards of service for responding to antisocial behaviour and for victims and witnesses of crime. These are a commitment to residents that the SSP will continue to keep Southwark a safe place to live, work and visit.
Southwark Violent Crime Strategy 2010/2015	The Southwark violent crime strategy 2010/15 detailing how the council, police and other partners in Southwark are tackling violent crime in the borough.
Southwark Statement of Licensing Policy 2016-2020	Section 5 of the Licensing Act 2003 requires each licensing authority to prepare and publish a statement of its licensing policy every five years.
<b>Economy and Employment</b>	
Southwark Employment Land Study (2016)	The study provides an assessment of the quantity, quality and viability of employment land throughout the borough and evaluates the viability of existing (UDP) employment policies as well as informing the LDF evidence base and associated policies.
Southwark's Economic Wellbeing Strategy 2017-22: A Partnership for Local Growth	Our new strategy sets out what we want to achieve between now and 2020, and how we aim to work across the Council and with our partners in the private, public and voluntary sectors in order to make Southwark a place:

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	<ul style="list-style-type: none"> <li>• Where people, especially our young people, are equipped with the skills and ambition to make the most of our central London location</li> <li>• Where businesses grow and prosper</li> <li>• Where town centres and high streets thrive</li> <li>• Where our residents are financially independent</li> </ul>
Southwark Industrial and Warehousing Land Study (2014)	Southwark Council commissioned GVA to undertake a review of industrial and warehousing land and premises in the borough. The study is an evidence base document and will inform the preparation of future planning policies, as well as a wider employment land review (a forecast of how much space will be needed to meet demand over the next 15 years or so) that will be carried out in 2014/15.
Culture Strategy 2013-2018 and action plan	We have developed a strategy to cover the period from 2013 to 2018 that uses our targeted support, partnership and leverage to enable the valuable cultural sector in Southwark to create, develop and grow. The key objectives are to generate opportunities, build local pride and deliver prosperity for the borough. The strategy is presented as a range of specific and measurable actions to be delivered over the next five years.
<b>Education</b>	
Primary Investment Strategy Cabinet Report 2017	This Cabinet Report sets out a series of recommendations for addressing need for additional primary school places in the borough
School Place Planning Strategy 2019-2023	This report sets out the forecast demand for primary and secondary places and the associated need for additional school places. It sets out the approach for meeting primary demand.
Southwark Extended Schools Strategy	<p>The strategy sets out a set out principles as the basis for the development of extended schools in Southwark.</p> <p>The strategy anticipates that providing extended services will</p> <ul style="list-style-type: none"> <li>• support improvements in standards</li> <li>• enable children to have fun and develop new skills</li> <li>• enhance support for vulnerable children</li> <li>• encourage parental involvement in children’s learning</li> <li>• make better use of facilities by opening them up to the community</li> <li>• provide better help to address children’s wider needs</li> </ul>

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<b>Flood Risk</b>	
London Borough of Southwark Strategic Flood Risk Assessment (2017)	A Strategic Flood Risk Assessment (SFRA) has been prepared to ensure that flood risk is taken into account and minimised in all new developments. The SFRA sets out the level of flood risk in different areas of the borough. This will help plan for new developments and assist in the determination of planning applications.
Southwark Interim Preliminary Flood Risk Assessment 2011	This document forms a Preliminary Flood Risk Assessment (PFRA) report for the Southwark in accordance with the Flood Risk Regulations 2009. The PFRA provides a high level summary of significant flood risk, based on available and readily derivable information, describing both the probability and harmful consequences of past and future flooding. The scope of the PFRA is to consider flooding from the following sources; surface runoff, groundwater and ordinary watercourses and any interaction these may have with main rivers and the sea
Local Flood Risk Management Strategy (2015)	Under Section 9 of the Flood and Water Management Act 2010 Act, Southwark Council is required to develop, maintain, apply and monitor a Local Flood Risk Management Strategy (LFRMS) for the borough. The LFRMS (“the Strategy”) should provide strategic direction in proactively managing flood risk in Southwark and to meet the requirements of the Act. The Strategy will be developed in consultation with key internal and external stakeholders, and will be reviewed every 6 years in consonance with the periodic reviews of Southwark Council’s Preliminary Flood Risk Assessment (PFRA) as required under the Regulations.
<b>Health</b>	
Better Environment, Better Health (Southwark) (2013)	The Better Environment, Better Health guide offers tailored information on seven important environmental factors that can impact on residents’ health. These factors are green spaces, active travel and transport, surface water flood risk, air quality, healthy food, fuel poverty and overheating. These guides are written for borough Health and Wellbeing Boards, Directors of Public Health, elected members, Regeneration and Planning Officers, Environmental Officers, Health Watch and Clinical Commissioning Groups (CCGs). The guides aim to influence local borough decisions and how budgets are decided and allocated. The hope is to encourage more collaborative work to reinforce London’s resilience to changes in climate and improve Londoners’ health.
Southwark’s Alcohol Action Plan (2017-2020)	The Alcohol Action Plan quantifies the prevalence of alcohol related behaviours, the impact of alcohol on health in Southwark and assesses the services provided to reduce alcohol related harm.
Annual Report by the Director of Public Health (2016)	Life expectancy in Southwark has never been higher, with women in Southwark living to an average of 82.9 years, which is above the national average of 82.3 and men in Southwark living to an average

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	of 77.8 years. However, every year up to 600 people die in Southwark before the age of 75. This year's Annual Public Health Report for Southwark focuses on how GP practices can work with their patients to prevent more early deaths. Southwark's early death rates from heart attack and chronic obstructive lung disease (covering emphysema and bronchitis) was significantly higher than the national average.
The Health of School-Aged Children and Young People in Southwark (5-19 Years): A School-Based Health Needs Assessment)	A detailed analysis of the demand and performance of Southwark's children's and health services.
Southwark Children and Young Peoples Health plan (2010)	<p>This plan sets out how we will improve the wellbeing of children and young people in regard to the five Every Child Matters outcomes:</p> <ul style="list-style-type: none"> <li>• Be healthy</li> <li>• Stay safe</li> <li>• Enjoy and achieve</li> <li>• Make a positive contribution</li> <li>• Achieve economic wellbeing</li> </ul> <p>This plan recognises and addresses the far-reaching implications of statutory changes to children's trusts, local safeguarding children boards, Children and Young People's Plans and the roles of lead members and directors of children's services, which came into force on 1 April 2010.</p>
Southwark Health Profile 2013	This report contains a summary of health and wellbeing issues represented through available statistics obtained from reliable sources. This document forms a part of the suite of documents published as a part of the Joint Strategic Needs Assessment work programme. The document is intended to provide an understanding of the health and well-being of Southwark residents. The content of this report is meant to support the health and social care commissioners; along with other stakeholders in primary, secondary and community care including local voluntary sector agencies.
Public Health Observatories: Southwark Health Profile (2014)	This profile gives a picture of people's health in Southwark. It is designed to help local government and health services understand their community's needs, so that they can work to improve people's health and reduce health inequalities.
Public Health Outcomes Framework: Southwark (2013)	The Public Health Outcomes Framework 'Healthy lives, healthy people: Improving outcomes and supporting transparency' sets out

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	<p>a vision for public health, desired outcomes and the indicators that will help us understand how well public health is being improved and protected. The framework concentrates on two high-level outcomes to be achieved across the public health system, and groups further indicators into four 'domains' that cover the full spectrum of public health. The outcomes reflect a focus not only on how long people live, but on how well they live at all stages of life. This profile currently presents data for the first set of indicators at England and upper tier local authority levels, collated by Public Health England.</p> <p>The profile allows you to:</p> <ul style="list-style-type: none"> <li>-Compare your local authority against other authorities in the region</li> <li>-Benchmark your local authority against the England value</li> </ul>
Child Obesity Joint Review (2012)	The child obesity joint review examines the high rate of childhood obesity in the borough and recommends a wide range of actions to counteract the increasing prevalence.
Joint Health and Wellbeing Strategy 2015-20	This strategy outlines how the council and its partners will work together to promote integration, improve outcomes and reduce health inequalities of Southwark's residents by focusing on three strategic objectives.
Lambeth and Southwark: Emotional Wellbeing and Mental Health Needs Assessment 2013	This needs assessment (NA) covers Lambeth and Southwark boroughs and was overseen by a stakeholders group. It aims to inform the commissioning strategies of the two boroughs and partner agencies.
Supporting the Health of Young People in Southwark: A summary report of the Health Related Behaviour Survey 2014	These results are the compilation of data collected from a sample of primary and secondary pupils aged 8 to 15 in Southwark during the summer term 2014. This work was commissioned by the Lambeth and Southwark Public Health team on behalf of the London Borough of Southwark as a way of collecting robust information about young people's lifestyles.
Betting, borrowing and health: Health impacts of betting shops and payday loan shops in Southwark (2014)	This report summarises evidence on the health impacts associated with the clustering of betting shops and payday loan shops in the context of Article 4 Directions. The objectives of this report are to: review existing evidence around health and wellbeing impacts; identify a range of local health indicators; and examine the spatial relationship between betting shops and pay-day loan shops and health indicators.
Article 4 directions	Southwark Confirmation of Article 4 Direction to withdraw the permitted development rights

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	associated with the change of use, demolition and alteration of public houses in Southwark (2017) Planning Committee Report Confirmation of Article 4 CAZ Direction (2018) Strategic evidence to support London Borough Article 4 CAZ Directions
Adult Social Care: Promoting independence, wellbeing and choice – Local Account 2012/2013	The Local Account is a new form of public performance report, setting out the progress councils have made in delivering national and local adult social care priorities and the key areas where further improvement is required.
Southwark Pharmaceutical Needs Assessment 2018-2021	From 1 April 2013, every Health and Wellbeing Board (HWB) in England has a statutory responsibility to publish and keep up-to-date a statement of the needs for pharmaceutical services for the population in its area, referred to as a 'pharmaceutical needs assessment' (PNA). The PNA will help in the commissioning of pharmaceutical services in the context of local priorities.
Southwark Health and Wellbeing Strategy 2015-2021	This sets out our partnership vision to improve health and reduce health inequalities in the borough.
Southwark Annual Public Health Report 2019	Annual report that is updated each year.
<b>Heritage, Design and Archaeology</b>	
Southwark Conservation Area Appraisals	The government requires all councils to produce appraisals for the conservation areas in their borough. Conservation area appraisals are intended to: Provide an analysis and account of the area; explain why it is considered to be of special architectural or historic interest; Give a clear indication of the council's approach to its preservation and enhancement. They are also used by the council in assessing the design of development proposals.
Southwark Archaeology Priority Zones	Southwark Council has policies to protect the borough's archaeology. The policy identifies seven archaeological priority zones (APZs). When development proposals are submitted for these areas, the archaeology officer conducts initial appraisals to assess the archaeological implications and ensures that any necessary investigations take place
Core Strategy: Policy 12 Tall building background paper, Southwark Council (2009)	Sets out the background and research that has informed the suitable locations for tall buildings as established in Policy 12 and supporting text contained within our core strategy. It summarises our evidence base, describes our strategy and our reasons for selecting the approach we have taken.
Core Strategy: Borough-wide	Sets out an overview of the character of Southwark to inform the evidence base which informs the

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Strategic Tall Building Study, Southwark Council (2009)	production of Core Strategy Policy 12, particularly the tall building height policy.
Guidance on Tall Buildings, July 2007, CABE & English Heritage	This document sets out how CABE and Historic England evaluate proposals for tall buildings. It also offers advice on good practice in relation to tall buildings in the planning process.
Heritage in local plans - how to create a sound plan under the NPPF, 2012, English Heritage	This is a guide to local authorities from Historic England on how to achieve the objectives of the NPPF for the historic environment and thereby pass the test for a sound local plan.
Seeing The History In The View: A Method For Assessing Heritage Significance Within Views, June 2011, English Heritage	This document presents a method for understanding and assessing heritage significance within views.
<b>Housing – General</b>	
New Southwark Plan Housing Policy Viability Study (2015)	This report examines in terms of financial viability, the potential for development sites in Southwark to deliver affordable housing at varying percentages and mixes, while maintaining other planning obligations at the current levels as advised.
Southwark Housing Requirements Study (and sub reports) 2010	The study was undertaken to inform local policies, in particular relating to the development plan and housing strategy surrounding affordable housing provision. The study provides a key component of the evidence base required to develop and support a robust policy framework.
Southwark Housing Strategy (2015)	<p>Southwark Council Cabinet agreed Southwark's first long-term housing strategy in January 2015. The Southwark housing strategy to 2043 consists of four principles:</p> <ul style="list-style-type: none"> <li>• We will use every tool at our disposal to increase the supply of all kinds of homes across Southwark.</li> <li>• We will demand the highest standards of quality, making Southwark a place where you will not know whether you are visiting homes in private, housing association or council ownership.</li> <li>• We will support and encourage all residents to take pride and responsibility in their homes and local area.</li> <li>• We will help vulnerable individuals and families to meet their housing needs and live as independently as possible.</li> </ul>
Planning Committee report on Affordable Rent (2011)	This Planning Committee report clarifies the council's affordable housing policies, including the council's current approach in addressing the affordable rent tenure.

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Affordable Rent in Southwark Study (2011)	This study looks at the affordability of affordable rent across the nine different postcode areas of Southwark. It models a range of scenarios from 40% to 80% market rents for one, two, three and four bedrooms dwellings. It shows that it will be very difficult for people in housing need to afford the affordable rent model, particularly family homes
Southwark Affordable Rent Studies	Our affordable rent studies look at the affordability of affordable rent tenure across the nine different postcode areas of Southwark. It models a range of scenarios from 40% to 80% market rents for one, two, three and four bedrooms dwellings. It shows that it will be very difficult for people in housing need to afford the affordable rent model, particularly family homes. Studies were released in 2012, 2013, 2014, 2015, and 2017.
Impact of the Affordable Rent tenure on the viability of developments in Southwark (2011)	This study looks at the viability of delivering affordable rent housing in Southwark. It considers the potential for development sites in Southwark to deliver affordable housing at varying percentages and mixes, while maintaining other planning obligations at the current levels as advised.
Southwark Commuted Sums Study 2011	This study looks at how much money could be secured as a pooled contribution in lieu of on-site affordable housing, if a scheme was 100% private housing rather than requiring affordable housing to be on site. It tests the amount of potential pooled contribution that could be viable by testing 35 sites across Southwark. It is part of the evidence base for the draft affordable housing supplementary planning document 2011.
Private Sector Housing Action Plan 2014/15	
Maximising independence through housing: The older people's housing delivery plan: Southwark Housing Strategy 2009 to 2016 (2012)	This plan covers both the supply of housing for older people and housing support services for older people. These services cross council departments and partner agencies.
Southwark Homelessness Strategy 2018-2022	The new Homelessness Strategy is a response to a period of unprecedented change, including the Homelessness Reduction Act, public services facing significant financial challenges and social housing and welfare reforms. It builds on the recent achievements, whilst responding and adapting to the changing environment in which homelessness and support services are delivered. The strategy is broken down into five priorities.
Gypsy and Traveller Needs	A needs assessment outlining where and how many gypsy and traveller pitches are required in

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Assessment (2019)	Southwark.
<b>Housing – Student accommodation</b>	
Southwark Planning Policy Evidence: Student Housing (2016)	London Borough of Southwark undertook research into the need for additional student housing in Southwark in 2016. The objective of this study is to report provide consolidated information on: Existing student accommodation in the Borough; the schemes of student housing currently in the pipeline with planning consent to include those under construction and those not yet started; and the student housing schemes with current applications.
Student Implementation Study (2011)	This study looks at how strategic policy 8 of the core strategy on requiring affordable housing within student homes could be implemented. It looks at ways in which the policy can be implemented as well as testing the viability of the policy. It is part of the evidence base for the draft affordable housing supplementary planning document 2011.
<b>Neighbouring boroughs:</b>	
Lewisham Council Sustainable Community Strategy (2008-2020) Our vision 2020: Lambeth Community Strategy (2008-2020) Croydon’s Community Strategy 2016-2021 The City Together Strategy: the Heart of a World Class City 2008-2014 Tower Hamlets Community Plan 2020 Building a better Bromley 2020 (2009) Westminster City Plan (2016)	Every London Borough has a Sustainable Community Strategy that is prepared by the Local Strategic Partnership. Broadly, the role of the strategy is to establish a vision for the how the borough should change over a set period for the benefit of the local community. The strategies are cross-cutting in terms of the themes covered and each is tailored to the key issues in each of the boroughs in question. Subsequent strategies, including Local Plans and other planning documents, should be linked to achieving this vision and where appropriate delivering specific objectives. The sustainable communities strategies for our neighbouring boroughs set the context for much of the partnership working that that we undertake with each other.
Lambeth Local Plan 2015 Lewisham Core Strategy (2011) Bromley saved UDP (2006) and emerging Local Plan (2014) City Plan 2036: City of London	The Core Strategies and Local Plans of each of the London Boroughs contain their vision for future development, usually over a 10 or 15 year period. They set out the spatial planning policies that establish guidance around strategic issues such as the distribution of housing, delivery of new jobs and economic growth, transport and connectivity, the environment and sustainability and the delivery of new infrastructure. Importantly, the Core Strategies of the various London Boroughs will set out

Policy or Plan	Summary of objectives and targets
Local Plan Draft for Consultation (2018) Tower Hamlets Core Strategy (2010) Croydon Strategic Policies Westminster City Plan 2016	planning issues that could potentially have an impact across administrative boundaries. Where a core strategy has not yet been adopted, the Unitary Development Plan forms the basis of the Local Plan for those boroughs.
<b>Open Spaces and Biodiversity</b>	
Habitat Regulation Assessment (2020)	The objective of the Habitat Regulation Assessment (HRA) screening process is to determine whether likely significant effects on designated Natura 2000 sites, either alone or in combination may result from the implementation of the local plan.
Southwark Open Space Strategy (2013) and evidence base (2013)	This report provides the evidence base setting out the current position with regard to the provision of open spaces in Southwark, This includes an updated audit of all the existing protected open spaces. The strategy sets out a number of recommendation on improving the quality of the existing open spaces and makes site specific recommendations for the different sub-areas of the borough.
Southwark Physical Activity and Sport Strategy 2014-2017	This study sets out what the council and PRO-ACTIVE Southwark partners will deliver to support more people becoming more active more often.
Active Southwark Sport and physical activity strategy 2019-2023	This strategy sets out the borough wide vision and direction for achieving greater participation and enjoyment in physical activity and sport.
Southwark Biodiversity Action Plan (2013-2019) and evidence base	A new Biodiversity Action Plan (BAP) has been developed and is in the process of being adopted by the Council. The BAP has been developed by the Southwark Biodiversity Partnership in accordance with national, regional and local legislation and policies. The plans will run from 2012 to 2018. This plan provides information and guidance on protecting, managing and promoting key wildlife habitats and species within London.
Southwark Tree Management Strategy (2013)	A tree management strategy is a policy framework for the trees owned, managed and/or protected by an organisation. Southwark Council's tree management strategy sets out a vision for the next five years and explains how we will achieve this vision. It is a reference document for anyone with an interest in Southwark's trees.
Southwark Draft Biodiversity Action Plan 2020. Protecting Biodiversity and Making Nature	This is the third Biodiversity Action Plan for Southwark. This plan builds on the successes of the two previous Biodiversity Action Plans started in 2005, and sets out a vision for the continued protection, conservation and enhancement of nature in the borough.

Policy or Plan	Summary of objectives and targets
Accessible for All (in consultation 2019)	
Southwark Open Space Strategy (2013)	The Open Space Strategy is the result of several years' work beginning with the preparation of an Open Space Strategy (2003) and continuing with the publication of the Open Space Strategy Evidence Report in 2010. Since publication of the 2010 Strategy we have carried out a detailed and comprehensive audit of all open spaces within the borough, whether publicly or privately owned and whether public access is unrestricted, limited or restricted.
Southwark Playing Pitch Strategy (2016)	This is part of the Southwark Physical Activity and Sport Strategy (PS&SS) for 2014 to 2017, and is a strategic assessment that provides an up to date analysis of supply and demand for playing pitches (grass and artificial) in the local authority. Given the breadth of sports played in the study area, as well as the intention of the Council to incorporate as much grass-roots participation as possible within the study, the assessment will focus on football, rugby union, cricket, hockey, tennis, American football, Australian rules football and gaelic football.
<b>Planning</b>	
New Southwark Plan (preferred option) (2015)	The New Southwark Plan explains the strategy for the regeneration of Southwark and contains area visions setting out aspirations for places, strategic policies setting out the Council's strategy for planning and regeneration. It contains detailed development management policies.
Southwark Core Strategy (2011)	The Core Strategy is a planning document that sets out how Southwark will change up to 2026 to be the type of place set out in our Sustainable Community Strategy (Southwark 2016). It affects everyone living, working and visiting Southwark. The core strategy sets out our long term vision, spatial strategy and strategic policies with an implementation plan up until 2026 to deliver sustainable development.
Saved Southwark Plan Policies (2013)	The Southwark Plan policies are saved where they are consistent with the core strategy.
Area Action Plans	<p>An Area Action Plan (AAP) is a development plan document focused upon a specific location or area subject to conservation or significant change. This could include a major regeneration project or growth area. It ensures development of an appropriate scale, mix and quality for key areas of opportunity, change or conservation. AAPs are subject to independent examination.</p> <ul style="list-style-type: none"> <li>• Peckham and Nunhead Area Action Plan (2014)</li> <li>• Aylesbury Area Action Plan (2010)</li> <li>• Canada Water Area Action Plan (2012)</li> </ul>

Policy or Plan	Summary of objectives and targets
Social Regeneration Charters	<ul style="list-style-type: none"> <li>• Old Kent Road Area Action Plan (emerging 2020)</li> </ul> <p>The council adopted an initial Southwark Regeneration Framework in September 2017. A revised Regeneration that Works for All Framework was adopted in January 2019. The Framework identifies 10 Social Regeneration Charter Areas in the borough.</p> <p>The following charters have been adopted:</p> <ul style="list-style-type: none"> <li>• Canada Water (December 2018)</li> <li>• St Thomas Street (December 2019)</li> <li>• Old Kent Road (January 2020)</li> </ul> <p>A draft Charter for Borough &amp; Bankside is awaiting adoption at the time of writing. Charters are currently being prepared for Bermondsey &amp; The Blue, Camberwell, Peckham and Nunhead, and Walworth subject to public consultation.</p>
Southwark Plan Adopted Policies Map (updated March 2012)	<p>The adopted proposals map is part of Southwark’s Local Plan and shows the proposals and policies for the following adopted plans which are used to make decisions on planning applications:</p> <ul style="list-style-type: none"> <li>• Southwark Plan (Southwark Unitary Development Plan) adopted July 2007</li> <li>• Aylesbury Area Action Plan</li> <li>• Canada Water Area Action Plan March 2011</li> </ul> <p>The adopted proposals map is updated each time a new Development Plan Document in the LDF is adopted.</p>
Southwark adopted Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPGs)	<p>Supplementary planning documents (SPDs) and supplementary guidance documents (SPGs) are used to provide more information and guidance on the policies in the development plan. They can be based on certain topics such as transport or design, or they can be specific to certain places such as Dulwich. Southwark has several SPDs and SPGs which provide additional information on the saved policies in the Southwark Plan (UDP) and Core Strategy.</p>
Southwark Annual Monitoring Reports (2004-2011)	<ul style="list-style-type: none"> <li>• The AMR assesses if our planning policies achieve their objectives and targets by using a collection of data from local, regional and national sources and a number of indicators that measure performance.</li> </ul> <p>The AMR sets out:</p> <ul style="list-style-type: none"> <li>• progress in producing planning documents</li> <li>• whether planning policies are achieving the objectives of the plan</li> <li>• what impacts the policies are having on the local environment, communities and economy</li> <li>• details of how policies need to be changed or replaced if we are not meeting our objectives or</li> </ul>

<b>Policy or Plan</b>	<b>Summary of objectives and targets</b>
	targets
<b>Pollution</b>	
Air Quality Strategy and Action Plan (2017)	This document will help deliver the National Air Quality Strategy for Air Quality Management Areas (AQMA).
Southwark Contaminated Land Strategy 2012-2017	This document establishes a programme to identify contaminated land and water in Southwark, and to facilitate its remediation according to UK National Regulations.
Southwark Air Quality Annual Status Report 2018	This report provides an overview of air quality in Southwark during 2018 and also lists progress with regard to the Air Quality Action Plan. It has been produced to meet the requirements of the London Local Air Quality Management statutory process.
<b>Town Centres</b>	
Southwark Retail Study (2015)	<p>The study considers:</p> <ul style="list-style-type: none"> <li>• The vitality and viability of Southwark's existing town centres</li> <li>• The extent to which Southwark centres are fulfilling their role in meeting the retailing needs of the borough</li> <li>• The need for further retail development during the local plan period, and possible scenarios for meeting any identified need for additional retail floorspace</li> </ul>
Southwark Retail Study: Old Kent Road Update (2018)	This retail study update informed the final iteration of the OKR AAP, taking into account the planned growth in nearby centres including Elephant and Castle (E&C) and Canada Water. It re-assesses the impact of the cumulative growth at E&C, Canada Water and OKR.
Southwark Street Trading and Markets Strategy (2010)	<ul style="list-style-type: none"> <li>• The street trading and markets strategy sets out how we want to work with traders to revitalise markets in the borough. The strategy aims to set out what we will do to: increase numbers of people using and trading on our markets; keep markets thriving and viable business environments; improve the management of markets and market areas.</li> </ul>
Town Centre retail surveys (2014)	This survey explores the health of 5 town centres in the borough and in particular the impact of Betting and Payday Loan shops on the environment and offer in these town centres.
<b>Sustainability</b>	
Environment Agency summary for Southwark (2011)	This report provides a snapshot of the environment in Southwark. It outlines trends and changes in the environment, and highlights some of the work being carried out in the local areas to improve the environment, and people's experience of it. The report has been compiled as an extension of the London State of the Environment report to provide a local focus on the Boroughs and the health of their environment.

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Southwark Energy and Carbon Reduction Strategy (2011)	The Energy and Carbon Reduction Strategy summarises the current situation with regard to carbon emissions in Southwark and sets out a series of recommendations as to how the council can reduce its own emissions.
Southwark Heat Networks Strategy Update (2019)	Approval of emerging district heating strategy including short-term projects, funding and enabling actions.
Scrutiny Committee Briefing: Climate Strategy – progress update (2019)	This briefing note summarises the progress made since the first Southwark Climate Emergency Summit which took place on 1st July 2019, and sets out a proposal and roadmap for the development of a Southwark Climate Strategy.
Southwark Old Kent Road Integrated Water Management Strategy (2018)	The IWMS will set a framework for understanding, planning and delivering water services and flood risk management infrastructure to support the proposed development within the OKR Opportunity Area.
Southwark Energy Background Paper (2020)	The Energy Background Paper summarises the current situation with regard to carbon emissions in Southwark and predicts future emissions. The paper recommends where meaningful action can be taken to reduce emissions.
<b>Transport</b>	
Movement Plan (2019)	The document sets out the councils ambitions for increasing the use of public transport and cycle and walking routes, and decreasing dependence on cars.
Southwark Transport Plan (2011)	The new Transport Plan for Southwark replaces the Local Implementation Plan. The Transport Plan sets out how we will improve travel to, within and from the borough. It also sets out our long term goals and transport objectives for the borough (up to 20 years), a three year programme of investment, and the targets and outcomes we are seeking to achieve. The Southwark Transport Plan responds to the revised Mayor's Transport Strategy (MTS), the emerging Sub-Regional Transport Plans (SRTPs), Southwark's Sustainable Community Strategy and other relevant policies.
Southwark Cycling Strategy (2015)	A strategy setting out objectives to work together in partnership with our neighbouring boroughs, TFL, the police, businesses, organisations and agencies, schools and local community groups and residents to further develop the local cycling economy, invest in cycle friendly infrastructure, promote a cycling culture and ensuring new developments are future proofed for cycling.
<b>Waste</b>	
Southwark Waste Management Strategy: 2003 – 2021	This sets out Southwark council's programme for achieving the waste management targets set out in the GLA Waste Management Strategy.
Southeast London joint waste	This technical paper has been prepared by the southeast London joint waste planning

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technical paper (2017)	group (hereon in abbreviated SELWG) in order to demonstrate how waste apportionment targets set by the London Plan (2016) will be met. The information is up-to-date as of December 2017, with capacity figures provided by fiscal year (up through 31 March 2016).
<b>Infrastructure and Viability</b>	
Southwark Community Infrastructure Levy (Revised Draft CIL Charging Schedule Dec 2014)	1. The Community Infrastructure Levy (CIL) is a new levy that local authorities can choose to charge on new developments in their area. CIL is a mandatory charge levied on most new developments that involve an increase of 100sqm or more of net additional internal floorspace or development that involves the creation of a new residential unit or more. The money can be used to support development by funding infrastructure that the council, local community and neighbourhoods need.
Southwark Infrastructure Plan	2. The Infrastructure Plan identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of Southwark's Core Strategy (2011-2026). It is a "living document" which will be updated regularly as further details about infrastructure requirement to support growth become clearer.
CIL Viability Further Sensitivity Testing, BNP Paribas, November 2013	3. This report includes further sensitivity testing to support the proposed Community Infrastructure Levy ('CIL') Revised Draft Charging Schedule.
CIL Viability Study (2014)	4. This report tests the ability of a range of developments throughout the London Borough of Southwark to yield contributions to infrastructure requirements through the Community Infrastructure Levy ('CIL'). Levels of CIL have been tested in combination with the Council's other planning requirements, including the provision of affordable housing.
Cemetery Strategy (2012)	5. This Cemetery Strategy seeks to address the chronic shortage of burial space in the borough. The Strategy focuses on practical options for burial within the current cemetery areas within Southwark but also takes account of potential options for burial outside of those areas.
Metropolitan Police Estate – Asset Management Plan (2007)	This document sets out the strategy for improving the Metropolitan Police Estate in Southwark over the next three years. The future estate will be based around the following five operational policing themes: <ul style="list-style-type: none"> <li>• Safer Neighbourhoods bases</li> <li>• Custody Centres</li> <li>• Patrol Bases</li> </ul>

<b>Policy or Plan</b>	<b>Summary of objectives and targets</b>
	<ul style="list-style-type: none"> <li>• Front Counters</li> <li>• Office accommodation</li> </ul>
MPA Estate Strategy 2010/14	6. This Estate Strategy sets out our vision for the estate in supporting the delivery of an effective policing service to London in a way that increases public confidence and safety.

### Neighbourhood

<b>Policy or Plan</b>	<b>Summary of objectives and targets</b>
Southbank and Waterloo Neighbourhood Plan (2020)	A neighbourhood plan has been adopted by the Southbank and Waterloo Neighbourhood Forum. The plan will direct development within the identified neighbourhood area.
University studies and reports	A number of Universities including London Metropolitan University Cass School of Architecture, University College London and London School of Economics are working on research and projects relating to the Old Kent Road. Some exhibitions of the work have taken place in Southwark. Studies can be updated here when they are ready to be published.
CASS Cities Audit Book (2015-16) and Interviews	Produced by architecture students from the Sir John Cass Faculty of Art, Architecture and Design, the document is an audit of the economic life of the Old Kent Road which researches and catalogues the existing environment and examined how a mixed use environment can be realised. <a href="http://www.casscities.co.uk/Cass-Cities-audit-book">http://www.casscities.co.uk/Cass-Cities-audit-book</a>
Elephant and Walworth Neighbourhood Forum research documents	The Elephant and Walworth Neighbourhood Forum in cooperation with a range of partners including Latin Elephant, the Elephant Amenity Network and UCL students have been working on a range of research studies to inform the progression of a neighbourhood plan, and there are parallels with the wider area including Old Kent Road. The workshops, reports and research are published at <a href="http://ewnf.herokuapp.com">http://ewnf.herokuapp.com</a>

## **Appendix 3 - Baseline Data - Facts and Figures**

### **INTRODUCTION**

The SEA Directive requires the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the borough and providing the basis for predicting and monitoring effects of the New Southwark Plan (NSP). To make judgements about how the emerging content of the NSP will progress or hinder sustainable development, it is essential to understand the economic, environmental and social circumstances in the borough today and their likely evolution in the future. The aim is to collect only relevant and sufficient data on the present and future state of the borough to allow the potential effects of the NSP to be adequately predicted.

The baseline data is comprised of two components across social, economic and environmental conditions of the Borough – Baseline indicators and contextual characteristics. The indicators are incorporated into the appraisal framework to assess the sustainability effects of policies in the current stage and monitor the policy performance and implications after they are adopted and implemented. The contextual information provides a background overview of the Borough's characteristics but is not included in the appraisal framework.

The SA/SEA Guidance provided by Government proposes a practical approach to data collection, recognising that information may not yet be available and that information gaps for future improvements should be reported as well as the need to consider uncertainties in data. Collection of baseline information should be continuous as the IIA process guides plan making and as new information becomes available.

A summary of the collated baseline information is provided below.

# **SOCIAL CONDITIONS**

## **Population**

### **Overview**

### **Baseline indicators**

No baseline indicators from this section are included in the sustainability appraisal framework.

### **Contextual characteristics**

The following contextual information characterise the Southwark's population and is not included in the appraisal framework. This data is taken from the Joint Strategic Needs Assessment (JSNA) produced by the Health and Well-being Board at the council and published as part of our Annual Public Health Report.

<b>Contextual characteristics</b>	
	Population change
	Age groups
	Diversity
	Density
	Faith

## **Population**

Before January 2015, the largest London's population has ever been was in 1939 where it was around 8.6 million people. However, on the 6<sup>th</sup> of January 2015, for the first time, London's population grew beyond its previous record, now estimated to be above the 1939 8.6m figure. London is growing at a significant pace, and Southwark is part of this growth.

At the time of the 2011 census, Southwark's total population was 288,283. The total population at the time of the 2001 census was 244,866. This is an increase of 43,417 (18% increase).

The GLA projected Southwark's population in 2014 to be around 304,100. In 2018, when the NSP will be adopted, the GLA projects this to be 326,400 and in 2033, the period up to which the New Southwark Plan will cover, the population of Southwark is estimated to be 370,400. This represents a 28% increase on the 2011 population figure, and a 21% increase on the 2014 estimate.

## Age groups of Southwark

The proportion of residents in each age group is as follows:

<b>Proportion of population by broad age band</b>			
mid-2012			
	<b>0–15 years</b>	<b>16–64 years</b>	<b>65+ years</b>
	%	%	%
<b>Southwark</b>	18.6	73.6	7.8
<b>London</b>	20.1	68.7	11.3
<b>England</b>	18.9	64.1	16.9

Source: Office for National Statistics <sup>6</sup>

In Southwark, the proportion of the population aged between 16-64 years is 73.6% making it the largest age group in Southwark at 212,176 people. This is 4.9 percentage points (pp) higher than the London region as a whole, and 8.8pp higher than the UK as a whole. Southwark has a smaller proportion of people in the 0-15 (at 53,620 people) and 65+ (at 22,486 people) age groups than the London region and the UK as a whole. Between mid-2003 to mid-2012, the proportion of people in the 65+ age group decreased by 9.6%. This is the only age group to see a decrease. The 0-15 age group saw a 7.7% increase and 16-64 age group saw a 20.6% increase. The average age of a Southwark resident is 33.8 years.

In the coming years, it is anticipated that the proportion of the population aged 65+ will increase. In 2012, 27.6% of people in Southwark were aged 45 or more. By 2031 this is projected to increase to 31.2%. For the 65+ age bracket the projected increase is from 7.8% to 10.1%.

## Diversity

54.2% of Southwark's population can be categorised in the broad ethnic group of "white." This is largely on par with the London region, however this is significantly lower (31.2pp lower) than England as a whole. 45.8% of Southwark's population are part of an ethnic minority (sometimes referred to as BME or BaME – Black and Ethnic Minority Background). The largest broad ethnic group is Black/African/Caribbean/Black British at 26.9%. This is more than double the London region (13.3%) and is between 7 and 8 times higher than England, at 3.5%. The next largest ethnic group in Southwark is Asian/Asian British, at 9.4% of the total population of Southwark. This is almost half the London region, and only 1.6pp higher than England. "Mixed/multiple ethnic groups" and "other ethnic groups" are roughly in line with London-wide figures, (at only 1.2pp and 0.1pp more than London as whole, respectively). However, these figures are between 2 and 3 times higher for London and Southwark compared with England.

Percentage of population by broad ethnic group  
2011

	White %	Mixed/ multiple ethnic groups %	Asian/ Asian British %	Black/ African/ Caribbean/ Black British %	Other ethnic group %
<b>Southwark</b>	54.2	6.2	9.4	26.9	3.3
<b>London</b>	59.8	5.0	18.5	13.3	3.4
<b>England</b>	85.4	2.3	7.8	3.5	1.0

Source: 2011 Census, Office for National Statistics <sup>8</sup>

36.5% of Southwark's residents were born outside the UK. This is 2.9pp lower than inner London as a whole, and 0.7pp higher than London as a whole. The largest migrant population in Southwark is Nigerian, representing 4.7% of the population. The second largest is immigrant population is Jamaican, at 2.0%. Third are Irish, at 1.7%.

The main language for 19.6% of people age 3 years and over is something other than English. This is below the inner London rate of 25.2% and the London-wide figure of 22.1%. This translates into 10.9% of households not having a member whose main language is English.

### Density

Southwark has an average of 10,173 people per sq. km. This is roughly in line with the inner London average of just below 10,410 people per sq. km. This is a slight increase (of 1.8%) on the 2001 figure of 9,990 people per sq. km. Southwark's population density is almost double that of the London average. Southwark and inner London's population density is roughly 25 times that of England as a whole.

The boundaries of Southwark cover 2,886 hectares. The number of people per hectare is 105.5 (the inner London figure being 106.4). London as a whole is 54.3 people per hectare.

### Faith

The majority of residents in Southwark who stated their religion in the 2011 Census were of Christian faith (52.5%) with the second highest category being 'No religion' (26.7%). By comparison 48% were of Christian faith in London and 59% nationally, with 21% of London residents expressing no religion and 24.7% nationally.

## Equality

### Baseline Indicators

The following indicators were used to characterise equality in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Indices of deprivation <sup>1</sup>
	Percentage of children living in deprived households <sup>2</sup>
	Percentage of older people living in deprived households <sup>3</sup>

### Contextual characteristics

There are no further contextual characteristics in this section.

### Description

The English Indices of Deprivation 2019 measure relative levels of deprivation across England on a range of economic social and housing issues. The level of deprivation is ranked among 32,844 small areas or neighbourhoods, named Lower-layer Super Output Areas (LSOA), with an average population of 1,500.

There are seven domains of deprivation which combine to create the Index of Multiple Deprivation (IMD 2019), including:

- Income (including numbers of adults and children on a range of benefits)
- Employment (including numbers on a range of out of work benefits)
- Education (including a range of school attainment figures for children and young people and those for adults with few/no qualifications)
- Health (including figures on standardised measures of morbidity, disability and premature death)
- Crime (including figures for recorded crime in four key areas: violence, burglary, theft and criminal damage)
- barriers to housing and services (including the accessibility of housing and proximity of key local services)
- living environment (includes separate scores for the quality of indoor living environment and outside living environment)

Southwark's rankings as compared with London and the country in the above seven domains are set out in the following table, with detail to be described under related themes in the subsequent sections.

	Ranking among 14 local authorities in Inner London	Ranking among 33 local authorities in Greater London	Ranking among 317 local authorities in England
Income rank	7	11	40
Employment rank	6	9	106
Education, skills and	7	20	262

<sup>1</sup> English Indices of Deprivation 2019

<sup>2</sup> ibid

<sup>3</sup> ibid

training rank			
Healthy and Disability rank	5	5	107
Crime rank	7	9	37
Living environment rank	5	5	12
Barriers to housing and services	7	15	16

Overall, Southwark was ranked as 43<sup>st</sup> most deprived borough out of the 317 local authorities in England. This is a gradual improvement from previous rankings of 41<sup>st</sup> in 2010 and 26<sup>th</sup> in 2007. Within London, Southwark was the 8<sup>th</sup> most deprived among all 14 inner boroughs and the 9<sup>th</sup> out of 33 local authorities.

Southwark has seen a slightly higher concentration of deprivation within the borough over the past nine years, with five (out of 166 LSOAs in Southwark) among the 10% most deprived in the country in 2019 as compared to four in 2010. Two of them were located in Faraday, others in Nunhead and Queen's Road, South Bermondsey and North Walworth.

Of all domains, living environment gave Southwark the highest national ranking of relative deprivation, with 12<sup>th</sup> among 317 local authorities across the country, followed by barriers to housing and services which made Southwark the 16<sup>th</sup> highest in the country. The borough had the lowest rank in education, skills and training nationally (262<sup>nd</sup> out of 317).

Besides the overall scoring for the borough, deprivation rankings were available at the LSOA level to provide a nuanced view of relative deprivation in smaller areas. Below are the number of smaller areas (LSOA) in Southwark that fall into the 20% and 10% most deprived areas across the country:

Domain of Deprivation	Number of LSOAs being the among 10% most deprived across the country	Number of LSOAs being the among 20% most deprived across the country
Income	56	13
Employment	25	1
Education, skills and training	-	-
Health	15	2
Barriers to housing and services	125	31
Crime	60	25
Living environment	86	31

Housing is the most challenging domain for Southwark to address deprivation. Ranked 7<sup>th</sup> in inner London and 15<sup>th</sup> in London overall, Southwark has the median level of relative deprivation in accessibility to housing and services. However, ¾ of its LSOAs (125 out of 166) fell into 20% most deprived across the country, with almost 1/5 LSOAs (31 out of 166) were 10% most deprived nationally).

In education, skills and training domain, Southwark had a relatively low ranking (within 80% - 100% deciles) across the country, with 125 out of 166 LOSAs among the 20% least deprived.

## **The Income Deprivation Affecting Children Index 2019 (IDACI) and The Income Deprivation Affecting Older People Index 2019 (IDAOPI)**

There are two supplementary indices of deprivation which are not part of the Index of multiple deprivations, measuring the proportion of children and older people experiencing income deprivation. The definition of low income used includes both those people that are out-of-work, and those that are in work but who have low earnings (and who satisfy the respective means tests).

In terms of children aged 0 to 15 living income deprived families, Southwark had half of the LSOAs (81 out of 166) falling into the 20% most deprived across the country. The five most deprived areas were in South Bermondsey, Faraday (having two most deprived LSOAs), Peckham and Newington.

For older people aged 60 or over experiencing income deprivation, Southwark had 113 out of 166 LSOAs which were among the 20% most deprived in England. The five most deprived areas were located in London Bridge and West Bermondsey, Camberwell Green, Nunhead and Queen's Road, Peckham and Chaucer.

### **Issues**

- Although the borough has seen improvement in relative deprivation since 2010, it remains one of the most relatively deprived areas in London and England for a number of deprivations
- There are high proportions of children and aged people living in income deprived families in Southwark

### **Data gaps and updates**

- None identified

# Housing

## Overview

The following indicators were used to characterise housing in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Additional general and affordable housing need <sup>4</sup>
	Bedroom requirement by tenure <sup>5</sup>

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
1) Housing affordability	Average house price <sup>6</sup>
	Average house rent <sup>7</sup>
	Ratio of median house price to median earnings <sup>8</sup>
	Number of households on housing register <sup>9</sup>
2) Housing stock and tenure	Number and percentage of council housing <sup>10</sup>
	Number and percentage of homes provided by housing associations <sup>11</sup>
	Number and percentage of private dwellings <sup>12</sup>
	Breakdown between occupier-owned and private rented in private dwellings <sup>13</sup>
	Housing typology <sup>14</sup>
3) New build homes (Use Class C3)	Housing targets in different versions of Draft New London Plan <sup>15</sup>
	Planning permissions and completions for new homes 2004 – 2019 <sup>16</sup>
	Affordable homes approved and delivered <sup>17</sup>

<sup>4</sup> Southwark Strategic Housing Market Assessment, 2019

<sup>5</sup> ibid

<sup>6</sup> Housing in London 2019 Tables, Greater London Authority

<sup>7</sup> Housing Market Trends Bulletin Southwark No. 63

<sup>8</sup> NOMIS – Official Labour Market Statistics; price to residence-based earnings ratio, Office for National Statistics

<sup>9</sup> Southwark Housing Strategy to 2043

<sup>10</sup> Southwark Key Housing Data 2015/2016

<sup>11</sup> ibid

<sup>12</sup> Tenure of Households by Borough, Office for National Statistics

<sup>13</sup> ibid

<sup>14</sup> Southwark Key Housing Data 2015/2016

<sup>15</sup> Draft New London Plan, Greater London Authority

<sup>16</sup> London Development Database, Greater London Authority

<sup>17</sup> ibid

	Small development approved and delivered <sup>18</sup>
	Student accommodation approved and delivered <sup>19</sup>
4) Housing needs	General housing and affordable housing needs <sup>20</sup>
	Bedroom requirement by tenure <sup>21</sup>
	Housing needs of older households and those with disabilities and wheelchair requirements <sup>22</sup>
	Housing need of students <sup>23</sup>

## Description

### 1) Housing affordability

#### - Average house price

In March 2019, the average house price in Southwark was £476,597. This compares favourably with the inner London average of £642,127, however Southwark's average house price is more expensive than the London average of £517,110. Across England as a whole, the average house price was £243,259. This makes the cost of buying a house in Southwark around 1.95 times more expensive than in the rest of the UK. (Housing in London, GLA, 2019)

#### - Ratio of median house price to median earnings

In 2019, the median household weekly income in Southwark was £623, higher than £590 in London and £482 nationally. Despite higher weekly income, Southwark residents have to spend around 15.19 times annual earnings on purchasing a home, which means to be relatively affordable than the inner London average of 17.08 times but higher than the London-wide and national ratios of 13.09 and 8 respectively.

#### - Number of households on housing register

In March 2015, there were 12,597 households on Southwark's housing register. This is significantly higher than the approximate 1,800 local authority lettings and 550 council nominations to housing association properties that become available each year.

### 2) Southwark's housing stock and tenure

<sup>18</sup> London Development Database, Greater London Authority

<sup>19</sup> ibid

<sup>20</sup> Southwark Strategic Housing Market Assessment 2019

<sup>21</sup> ibid

<sup>22</sup> ibid

<sup>23</sup> ibid

- Percentage of Southwark council's housing

In April 2015, Southwark Council is the largest landlord in London and the 4<sup>th</sup> largest in the country, following Birmingham, Leeds and Sheffield. It is responsible for 37,885 dwellings within its boundaries, equating to around 30% of the total homes in the borough. This is a significantly higher proportion than Greater London as a whole, where 17.1% of the total housing stock is owned and managed by local authorities.

- Number and percentage of homes provided by housing associations

In 2015, the number of total housing association housing was 16,918 units (Southwark key housing data 2015/2016). The largest proportion of the stock is one-bed at 36%, followed by two-bed 31% and three-bed 20%

- Number and percentage of private dwellings

The majority of tenure in Southwark is private dwellings, including owner-occupied and private rented housing, with 76,500 homes making up 59% of the total homes in the borough in 2016. With Southwark being one of the largest landlords in the country, the borough's percentage of private dwelling is still significantly less than 76.8% in London as a whole and the national average of 82.7%.

- Breakdown between owner-occupied and private rented in private dwellings

Out of all tenures in 2016, 36.6% are owner-occupied, while 22.5% are rented to private tenants. Compared with 51.2% owner occupied and 25.6% private rented for London as a whole, the borough has a relatively lower share of owner-occupied housing.

- Housing typology

Based on Southwark Private Sector House Condition Survey 2008, flats are the main private housing type in Southwark, comprising 48% of the total private homes. It was higher than the 37.1% London-wide figure. Of houses, most are terraced and there was only a small proportion of detached/semi-detached housing. Having a long history of development, Southwark has 43% of the private dwellings constructed before 1919, and 43% after 1964.

### **3) New build homes (Use Class C3) in Southwark**

- Southwark housing targets in various versions of New London Plan

The adopted London Plan (2016) set a target of 27,362 new homes for Southwark between 2015 and 2025, averaging 2,736 net new homes every year. This includes new-build, conventional, self-contained homes, non-conventional and non-self contained homes (such as hostels, HMOs, care homes and student housing) and long term vacant properties brought back into use

In Draft New London Plan (July 2019), the 10-year housing target for Southwark reduced to 25,540 units between 2019 and 2029, equating 2,554 net additional homes per year. As a component of the overall housing target, 800 units' net completions are required on small sites for Southwark per year, totalling 8,000 net new homes for the 10-year period.

The inspector's report (October 2019) recommended the Draft New London Plan to further reduce Southwark's 10-year housing target to 23,550 homes, of which 6,010 units are to be completed on small sites. These changes will be reflected in the Intend to Publish version of New London Plan, scheduled to be published by end of 2019.

- Planning permissions and completions for new homes (2004 – 2019)

Southwark Council is a top performing borough for providing social rented housing and other housing tenures. Between 2004 and 2019, Southwark has approved more net new homes than required by the targets set out in different versions of London Plan, totalling 42,937 units in both conventional and non-conventional developments, with an annual average of 2,862 homes.

Although the planning system has the power to guide and manage developments, whether and when the permitted private developments are out of the council's control. Over the above fifteen years, a total of 23,521 new homes were completed with an annual average of 1,568 units.

- Affordable homes approved and delivered

Between 2004 and 2019, 9,924 net affordable homes were secured from developments through the planning system, accounting for 48% of developments that are required to provide affordable homes with the creation of 10 or more units (known as major developments). These include social rented, affordable rent, London Living Rent and other intermediate housing types.

Out of total net new 22,516 conventional homes completed from major developments, 33% affordable homes were delivered at 6,416 units. Around 42% of these homes were social rented.

In 2016/2017, Southwark was the sixth largest affordable housing provider in London, delivering 23% affordable homes in that year. It compared favourably with London-average of 18%.

Small development approved and delivered

Most new homes have been completed through major developments in Southwark, however small scale developments have also played an important role in the overall housing supply. Between 2004 and 2019, 2,275 applications were approved on developments of one to nine units, leading to 5,567 net approved new homes. In the same time period, 3,711 new homes were completed from the small developments, accounting for 16% of total new homes.

Student accommodation approved and delivered

According to the Mayor of London's most recent Annual Monitoring Reports 12-14 (2014-2017) with the latest published in September 2018, Southwark has approved a limited number of student hall bedrooms due to the number of applications received at that time, with 8 in 2014/2015 and none in both 2015/2016 and 2016/2017.

However, Southwark was the fifth largest provider of student accommodation in London for the same time period, just behind Brent, Camden, Ealing and Lambeth. It delivered 1,221 students hall rooms between 2014 and 2017, with 832, 117 and 272 student hall rooms in 2014/2015, 2015/2016 and 2016/2017 respectively.

## **Housing needs**

### General housing and affordable housing needs

In South East London Strategic Housing Market Assessment (SHMA) 2014 which looked at housing needs across the South East London sub-region, Southwark was estimated to have an annual need of 1,647 new homes and 799 net affordable homes.

An updated SHMA specifically to Southwark undertaken in 2019 SHMA revised the annual need of new homes to be 2,932 units with additional needs of 2,077 affordable housing (71% of total need) per year using the new standard methodology in the planning practice guidance and the GLA-2016 based central trend household projections.

The updated evidence demonstrates that the need for new homes and affordable homes has become even more acute in Southwark over the past three years, where there are a 78% rise of the annual need for new homes overall and 1.6 times growth affordable housing needs.

The annual net affordable housing need is calculated from the aggregate of backlog needs, newly arising needs and existing households falling into need after deducting the annual supply of affordable homes estimated at 1,436 units:

- Backlog needs from 2,934 concealed households, 6,745 overcrowded households, and 2,336 homeless households who are currently living in temporary accommodation per year;
- 3,943 newly forming households per annum;
- 205 existing households falling into need per year.

### - Bedroom requirement by tenure

The highest need for social rent and the sub-social rent (who can afford a social rent but not 50% of the lower quartile market rent and those who cannot afford a social rent) target group is two, three and four bedroom units. In this group, there is a shortfall of 659 units and an oversupply of one bed units of 200.

For intermediate units, there is an undersupply in all thresholds and bedroom sizes. The SHMA also shows that for market housing there is a requirement of 20% one-bed homes, 30% two-bed homes, 34% 3-bed homes and 16% four-bed homes.

- Housing needs of older households and those with disabilities and wheelchair requirements

There will be a 79% projected increase in the population of Southwark aged 65 or more by 2039, comprising 13% of the Southwark population

The housing requirements for those with disabilities are linked to the age of the population. The number of older people with mobility disabilities is forecast to increase from 4,544 in 2017 to 7,690 in 2035. People over 65 with dementia is projected to reach 2,369 by 2030.

Currently 613 households have unmet wheelchair accessible accommodation requirements, which is across all tenures. For care homes and dementia places, additional or improved 867 care beds will be required by 2029.

The borough will also need additional 780 units of specialist elderly accommodation by 2029, of which some 559 (72%) should be sheltered and 116 (14%) extra care.

- Housing needs of students

There are over 21,000 students aged 20 or over residing in the borough during term time and there are 23,500 places at the major Higher Education (HE) institutions in Southwark. At least 57% live in private rented accommodation and 15% live with their parents.

According to SHMA 2019, there are likely to be a significant supply of 7,800 units of purpose-built student accommodation (PBSA) in the borough. Meanwhile, the Mayor's Academic Forum indicates the forecast of student numbers in London to slow down.

- **Issues**

Housing supply and affordability is a pressing issue for Southwark, where building enough homes with right mixture of tenures is the strategic priority of the council to meet the housing needs of all residents. Southwark SHMA undertaken demonstrates there is an even more acute need for general and affordable housing as compared to the previous version South East SHMA 2014.

Even though Southwark has a good track record of delivering affordable homes, 2019 SHMA informs there is a greater demand for affordable homes than the current supply, where there is particularly a shortfall in family-sized (two to four bedroom) social rented housing.

### **Data gaps and updates**

- There is a need for the more updated data of the current housing stock and tenure in the borough as the data currently analysed is based on the Key Housing Data 2015/2016.

## Education, Skills and Training

### Overview

#### - Indicators

The following indicators have been incorporated into the sustainability appraisal framework:

<b>Baseline Indicators</b>	
	Proportion of 16-17 year olds not in education, employment or training (NEET) or whose activity is not known <sup>24</sup>
	Proportion of people aged 16-64 years old who have attained a NVQ Level Four or higher <sup>25</sup>
	Proportion of residents with no qualifications <sup>26</sup>
	Education and skills deprivation <sup>27</sup>
	Number of apprenticeships created within the borough <sup>28</sup>

#### - Contextual characteristics

- The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

<b>Contextual characteristics</b>	
	Number of libraries <sup>29</sup>
	Current provision of school place <sup>30</sup>
	Demand for early years place <sup>31</sup>
	Demand for state-funded school places <sup>32</sup>

### Description

- **Young people not in employment, education or training**

<sup>24</sup> NEET and participation: local authority figures, Department for Education

<sup>25</sup> NOMIS Labour Market Survey

<sup>26</sup> NOMIS Labour Market Survey

<sup>27</sup> English indices of deprivation 2019, MHCLG

<sup>28</sup> Southwark Skills Strategy 2018

<sup>29</sup> Southwark Library and Heritage Strategy 2019 - 2022

<sup>30</sup> Pupil Place Planning 2019, Southwark

<sup>31</sup> Childcare Sufficiency Assessment 2019, Southwark

<sup>32</sup> 2018 School place demand projections, Greater London Authority

In 2019, almost 1/10 (9.9%) of 16-17 year old residents, totalling 520 people, in Southwark were not engaged in education, employment or training or not known for any activity undertaken. This accounted for 9.9% missing from formal education, employment or training within this age group, compared to 4.8% in London and 5.5% nationally.

- **Attainment of NVQ Level 4 and without qualification**

Southwark has a higher proportion of residents who receive university educations, compared to the rest of London and the country. In 2019, 149,000 residents aged 16 – 64 in Southwark attained qualification level NVQ4 (National Vocational Qualification) or above, taking up 64.6% of the age group. It fares better than both the London-wide 53.1% and Great Britain's average of 39.3%.

- On the other hand, 5.7% residents aged 16 – 64 were did not possess any qualification in the same year period, totalling a number of 13,200.

- **Number of apprenticeships in Southwark**

- Between 2016 and 2017, 842 apprenticeships were created in Southwark, equating 41% of the apprenticeships created by all London boroughs during that period.

- **Education and skills deprivation**

- For the education, skills and training domain set out in English indices of deprivation 2019, Southwark ranked lower than average across inner London (8<sup>th</sup> out of 14 local authorities), London-wide (22<sup>nd</sup> out of 33) and nationally (262<sup>nd</sup> out of 317), meaning it is relatively less deprived than average.

- **Number of libraries**

According to Southwark Library and Heritage Strategy 2019 – 2022, there were 12 libraries across the borough.

## **School Places:**

- **Current supply of primary school places**

- In September 2019, there were 3,760 available primary reception places (the equivalent of 125 forms of entry) in Southwark, and 26,995 year Reception to 6 primary places (the equivalent of 900 primary schools).

- **Current supply of secondary school places**

- There were 3,476 Year 7 places available in Southwark as of September 2019, equating 116 forms of entry. For Year 7 to 11, 16,098 places were available which was equivalent to 537 classes.

- **Special Education Needs and Disabilities (SEND) school attendance**

- In September 2019, there were 4,100 SEND children's attending primary schools and 2,800 going to secondary schools and post-16 combined.
- **Provision of free early education places (2-4 years old)**
- For children that are eligible for receiving free early year education and childcare funded by the government, there were a total of 7,800 two to four year-old children receiving the free education in Southwark in 2018. The number of children in free provision was reduced by 4% to 319 compared with 2017, which was in line with the national trends due to the declined birth rate.
- **Forecast needs for stated-funded places (2019 – 2028)**
- Projections of the needs for school places are provided by the GLA using a standard model for the majority of London local authorities. Taking into account the most up-to-date birth data and housing data, each annual round of projections may see a variation to the 10-year prediction trend. The longer-term prediction relate to projected rather than actual births so are less reliable than the short to medium term projections based on actual birth data.
- Based on 2018 GLA projections, there will be a total demand for state-funded primary and secondary school places at 21,912 and 14,641 annually.
- According to Southwark Childcare Sufficiency Assessment 2019, there were an estimated number of 20,954 children under age five in 2019, and 23,178 in 2039.
- Noting the updated forecast of primary and secondary school place needs from 2019-2020 onwards, the council published Pupil Place Planning Report in September 2019 to provide an update on the existing supply of primary and secondary places across the borough and set out actions to continually monitor to ensure supply matches demand. Currently, there are sufficient places to meet the demand in the early year's education and childcare for children under 5, and the primary and secondary phases of education in Southwark.
- **Issues**
- The proportion of NEETs is higher than London average, which demonstrates the need for training and employment opportunities for young people.
- **Data gap and updates**
- No significant data gaps have been identified

## Public health and wellbeing

### Baseline indicators

- The following indicators have been incorporated into the sustainability appraisal framework:

Baseline indicators	
	Life expectancy at birth for males and females <sup>33</sup>
	Healthy life expectancy at birth for males and females JSNA factsheet 2019 – life expectancy <sup>34</sup>
	Number of excess winter deaths <sup>35</sup>
	Index of health deprivation and disabilities <sup>36</sup>
	Percentage of adult carers who have as much social contact as they would like <sup>37</sup>
	Percentage of physically active adults <sup>38</sup>
	Number and percentage of reception and Year 6 children who are overweight (including obesity) <sup>39</sup>

### Contextual characteristics

- The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
	Mental health <sup>40</sup>
	Projected ageing population <sup>41</sup>
	Projected number of 65 year-old or above residents with dementia <sup>42</sup>

### Description

- **Life expectancy at birth for males and females**

<sup>33</sup> Public Health Outcomes Framework, Public Health England; Joint Strategic Needs Assessment factsheet 2019 – life expectancy, Southwark

<sup>34</sup> ibid

<sup>35</sup> ibid

<sup>36</sup> English Indices of Deprivation, MCHLG

<sup>37</sup> Public Health Outcomes Framework, Public Health England

<sup>38</sup> ibid

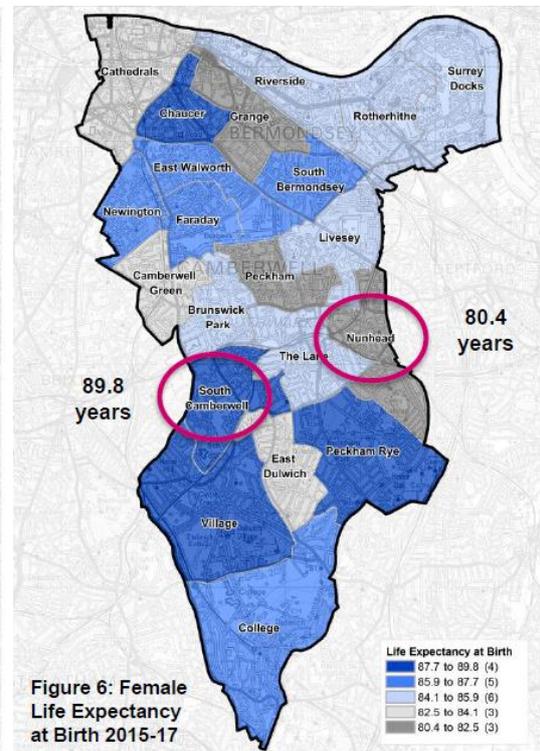
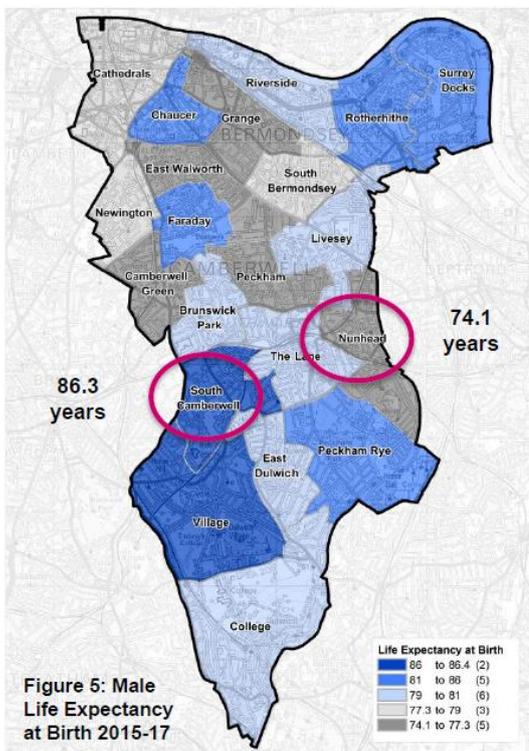
<sup>39</sup> ibid

<sup>40</sup> Adult Psychiatric Morbidity Survey 2014, Southwark

<sup>41</sup> Southwark Strategic Housing Market Assessment, 2019

<sup>42</sup> ibid

- Life expectancy is often used as the over-arching measure of the health of the population, and is a key indicator within Public Health Outcomes Framework. In 2015-2017, life expectancy at birth in Southwark was 78.9 years for males and 84.4 years for females, making a substantial improvement in the gap between Southwark and England (79.6 for males and 83.1 for females in the same period).
- However, Southwark had the fourth lowest life expectancy at birth among males in London in 2015 – 2017, which had an average life expectancy of 80.5 years for males and 84.3 for females. Compared across the region, Southwark males' life expectancy was four years below Kensington and Chelsea, which has the highest at 83.2 years, and females was two years below Camden, ranking first at 86.5 years.
- There are significant inequalities in life expectancy at birth between communities in Southwark among both males and females. Life expectancy is the highest in South Camberwell (86.3 years for males and 89.8 years for females) and lowest in Nunhead (74.1 years for males and 80.4 years for females).



Source: Joint Strategic Needs Assessment Factsheet 2019 – Life expectancy

- Several key causes of death has led to the gap in life expectancy among communities within the borough, including Cardiovascular Disease, Cancer and Respiratory Disease which account for 58% of the gap in life expectancy for males between communities and 48% for females.
- **Healthy life expectancy at birth for males and females**
- Healthy life expectancy is often considered a measure of the length of time spent living in good health. In 2015 – 2017, Southwark had an average of 62.4 years for

males and 64.6 years for females, marking a gap of 16.5 years for men and 13.6 years for women from life expectancy.

- Trends indicate the gap between healthy life expectancy and overall life expectancy has narrowed, particularly among women. The gap among women decreased from 21 years in 2010-2012 to 13.6 years in 2015-2017, whereas for men dropped from 18.2 years to 16.5 years in the same period.
- Across London, Southwark had the second highest healthy life expectancy among females in the same period, with the low ranking in London (24<sup>th</sup> out of 32 boroughs) for males.
- **Number of excess winter deaths**
- In common with other countries, more people die in the winter than in the summer in England, which also applies to Southwark. In the period between August 2017 and July 2018, there were 45 excess winter deaths in Southwark, with 10.2% meaning the ratio of excess winter deaths against the average non-winter deaths.
- Southwark had the second lowest number of excess winter deaths among 31 other London boroughs (except City of London) in that period, faring favourably with the London average of 27.1% and 30.1% nationally.
- According to Office for National Statistics, the three leading causes for excess winter deaths were circulatory diseases, respiratory diseases and dementia and Alzheimer's disease. Respiratory diseases remained the most prominent underlying cause of the death with 84.9% more respiratory deaths in the winter months compared with the non-winter months in 2017 to 2018. This accounted for 34.7% of all excess winter deaths within the country during that period.
- **Index of health deprivation and disability**
- Health is one of the seven domains forming the English Indices of Deprivation to compare areas across England in terms of the risk of premature death and the impairment quality of life through poor physical and mental health. In the 2019 index, Southwark performed better than London and the country on this measure, being the 5<sup>th</sup> least deprived out of 14 inner London boroughs, 28<sup>th</sup> among the 33 boroughs in London and 211<sup>th</sup> out of 317 areas across the country.
- **Percentage of adult carers who have as much social contact as they would like**
- As a proxy measure for social isolation, Personal Social Services Survey of Adult Carers in England – England finds that 39.8% of adult carers in Southwark think that they have as much social contact as they would like in 2017-2018. It was the fourth best performing borough, faring better than the average (35.5%) in London and the national average of 35.5%.
- **Percentage of adult social carers who have as much social contact as they would like**

- However, when it comes to the adult social carers, the other survey named Adult Social Care Survey shows that only 38.5% of the respondents living in Southwark think they have as much social contact as they would like, which was the among the fifth worst boroughs in London. It was below the average 46% in London and the national average of 46%.
- **Mental Health**
- Every seven years, the Adult Psychiatric Morbidity Survey (APMS) is conducted to provide an assessment of mental health in England. The results from the 2014 survey show that one in six adults had a common mental disorder (CMD) in the week prior to the survey, compared to one in five adults in London. Applying the London prevalence to Southwark, the borough is estimated to have almost 47,600 adults experiencing a CMD, which will be projected to rise to around 52,000 over the next decade.
- For child and adolescent mental health, nationally one in ten children and young people aged 5-16 have a clinically diagnosed mental health disorder. This equates to 1,460 children in Southwark with emotional disorders such as depression and anxiety, 2,300 children with conduct disorders such as oppositional defiant disorder and socialised conduct disorder, and 650 children with hyperkinetic disorders including attention deficit hyperactivity disorder (ADHD).
- According to the JSNA factsheet 2017 – Mental Health, Southwark is one of five London boroughs to report higher suicide rates than the national average in 2013-2015, with 26 cases per year that predominantly occur among men.
- The same report shows there are 3,800 cases of severe mental health disorder in Southwark. More than half of the population are male.
- **Percentage of physically active adults**
- Based on the Active Lives Adult Survey conducted by Sport England, seven in ten (73.8%) Southwark residents were reported to be physically active, making Southwark the third best performing borough after Richmond upon Thames and Islington. Comparatively, the percentage was 66.4% in London with the national average of 66.3%.
- **Number and percentage of Reception and Year 6 children who are overweight (including obesity)**
- Southwark has a higher share of children who are overweight or obese compared to the rest of London and the country across ages from Reception year to Year 6.
- In 2017/2018, 769 Reception year children (25.4%) were overweight or obese, compared to 37.7% in London and 34.3% nationally. During the same period, 1,145 year 6 children (39.8%) in Southwark were overweight or obese. The percentage was higher than London average (37.7%) and the rest of the country (34.3%).

- **Projected ageing population and those with dementia**
- Based on SHMA 2019, the number of residents aged 65 or above is projected to rise by 79% to 48,000 by 2039, accounting for 13% of the Southwark population. Among the growth, those over the age of 75 will increase by 92% and those over 85 will have 87% growth.
- In the same report, there is a projection of 1,772 local residents aged 65 or above with dementia, and gradually growing to 2,369 by 2030.

### **Issues**

- Southwark's life expectancy at birth for males and females is among the lowest in London
- There are significant inequalities in life expectancy at birth between communities in Southwark
- Southwark has one of the highest healthy life expectancy for females in London, but one of the lowest for males.
- Further support is needed to tackle social isolation for adult social carers
- The projected ageing population that are often accompanied by health conditions such as dementia presents a public health challenge
- Child obesity in Southwark is more prevalent than London and the country on average.

### **Data gap and updates**

- There is an evidence gap between the actual number of residents with common mental disorder and those who are diagnosed. Therefore, it is not advisable and useful to mark reduction in diagnosis as an indicator to measure the mental health condition of the population
- There is a potential need to identify the local profile of mental health apart from the estimation derived from London prevalence shown in the Adult Psychiatric Morbidity Survey (APMS).

## Safety

### Baseline indicators

The following indicators were used to characterise safety in the borough.

Baseline indicators	
	Crime rate per 1000 of the population for key offences and total number of key offences per year <sup>43</sup>
	Crime deprivation <sup>44</sup>
	Total number of pedestrians' and cyclists' casualties on road <sup>45</sup>
	Fatal and serious casualties on road <sup>46</sup>
	Local perception of safety and crime (emerging) <sup>47</sup>

### Contextual characteristics

No further contextual characteristics were used in this section.

### Description

- **Crime rates per 1000 people and total number of offences in Southwark per year**
- Between July 2018 and June 2019, 120 key offences per 1000 of the population in Southwark were recorded, totalling 38,113 offences overall. The crime rate per 1000 people made Southwark the sixth highest in both Inner London and Greater London. In terms of the total offences, Southwark was ranked the fourth highest across London.
- Of the key offences recorded, the majority were theft offences (16,042 offences), followed by violence (8,879), criminal damage and arson (2,225) and robbery (2,119).
- **Crime deprivation**
- Crime deprivation is one of the seven domains forming English Indices of Deprivation to rank areas across England based on the risk of personal and material victimisation at local level. In 2019 index, Southwark was ranked seventh of the 14 inner London boroughs, and the ninth among the 33 London boroughs. Nationally, it was the 37<sup>th</sup> most deprived among all 317 local authorities. Of 166 Lower-layer Super Output Areas (LSOA) within Southwark, 25 areas (equating to 1 every 8) are among the 10% most deprived areas within England.
- **Road safety**

<sup>43</sup> Office for National Statistics Local Profile

<sup>44</sup> English indices of Deprivation 2019, MHCLG

<sup>45</sup> Casualties in Greater London - Transport for London

<sup>46</sup> ibid

<sup>47</sup> Available when Social Research for Southwark's Social Regeneration Charter is published

- **Pedestrian and cyclists casualties**
- According to Transport for London's Casualties in Greater London, there were casualties of 234 pedestrians and 371 cyclists in Southwark in 2018 with a decrease of 6% and a rise in 12% respectively compared to 2017, signifying that fatalities and injuries relating to cyclists are on the rise.
- Both the casualties for pedestrians and cyclists in Southwark were above the average in London (175 and 144). Of all the casualties reported, fatal and serious ones in Southwark were also higher than London average, reaching 189 casualties compared to 123 in the latter.
- **Issues**
- The number of offences remain high in Southwark as compared to the rest of London, especially theft offences
- Southwark is among the highest deprived areas in terms of crime regionally and nationally
- Casualties for cyclists in Southwark are higher the London average with a rising number as shown in 2018
- **Data gaps and update**
- There is a need to understand the residents' perception of safety in the neighbourhood besides the reported and recorded offences. The gap of evidence will be filled upon the completion of the social research, purposed for the development of Social Regeneration Charter, which collects and analyses socio-economic data in five opportunity areas in the borough

## Social cohesion

### Baseline indicators

The following indicators were used to characterise safety in the borough.

Baseline indicators	
Percentage of residents	being an active member of their community <sup>48</sup>
	feeling that they contribute to the local economy <sup>49</sup>
	volunteering in Southwark Council <sup>50</sup>
	who feel wholly or partly positive about change in the borough <sup>51</sup>
	who have personally benefitted from change <sup>52</sup>
	Perceptions of neighbourliness and how well local people get on well together (emerging) <sup>53</sup>
	Local perception of the ability to have their voice heard and influence decisions (emerging) <sup>54</sup>

### Contextual characteristics

- The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual Characteristics	
Percentage of residents	working in the borough <sup>55</sup>
	mentioning 'community' when they positively feel about change in Southwark <sup>56</sup>
	considering the community to play a role in helping young people and future generations to succeed in life <sup>57</sup>

### Description

Southwark appreciates community engagement; involvement and coproduction are keys to the social regeneration approach. Therefore, the council conducted Southwark Conversations, the most far-reaching and representative consultation in the council's history, in late 2017 to develop a deeper understanding of perceptions and experience of regeneration in the borough. The feedback was collected and summarised as follows:

<sup>48</sup> Southwark Conversations 2018, Southwark

<sup>49</sup> ibid

<sup>50</sup> ibid

<sup>51</sup> ibid

<sup>52</sup> ibid

<sup>53</sup> Available when social research for Southwark's Social Regeneration Charter is published

<sup>54</sup> ibid

<sup>55</sup> Southwark Conversations 2018, Southwark

<sup>56</sup> ibid

<sup>57</sup> ibid

- 1 in 4 people are active member of their community
- 1 in 5 people feel that they contribute to the local economy
- 1 in 7 people volunteer in the borough
- 70% of residents feel wholly or partly positive about change in the borough
- 52% of residents feel they have personally benefitted from change in the borough

One in six residents work in Southwark, meaning around 17% of Southwark residents are also working in the borough. When discussing how they feel positively about change in Southwark, 18% mentioned community with topics around the sense of community, community identity, diversity and vibrancy of communities, which was only after the most said housing theme.

During the consultation, community is the most mentioned theme in facilitating positive changes to the environment in terms of helping the young generation and creating a good neighbourhood.

17% of respondents consider community to be crucial in helping young people and future generation to succeed in life, developing them into well-rounded individuals by providing good role models for young people, helping them to improve confidence, motivation and good citizenship through community opportunities like volunteering, and helping to create an environment that discourages anti-social behaviour in public places.

When talking about creating a good neighbourhood to live in, people were most likely to mention 'community', taking up 58% of all the responses. Having friendly and helpful neighbours, stable, diverse and cohesive communities, as well as a sense of pride in their area are all felt to help to foster a sense of community and bring people together.

### **Issues**

- Southwark is a central London borough with a host of regeneration opportunities to unlock the development potentials and revitalise the neighbourhood, during which empowering communities and making sure regeneration works for all is at the strategic priority in driving the change
- Therefore, it is crucial to make residents feel their ability to have their voices heard and influence decisions

### **Data gaps and update**

- The community survey needs to be undertaken on a regular basis to reflect the up-to-date community's perception and experience of the ongoing regeneration programmes
- Additional indicators of the community's perceptions will be available after the social research for Southwark's Social Regeneration Charter is conducted, including:
  - o Perceptions of neighbourliness and how well local people get on well together

- Local perception of the ability to have their voice heard and influence decisions

# ECONOMIC CONDITIONS

## Economy and employment

### Overview

#### Baseline indicators

The following indicators are used to character economy and employment in Southwark and included in the sustainability appraisal framework.

Baseline indicators	
	Number of employee jobs <sup>58</sup>
	Number of micro and small-to-medium sized enterprises <sup>59</sup>
	Percentage of unemployed population <sup>60</sup>

#### Contextual characteristics

The following contextual characteristics are used to give an overall description of employment and business in the borough. These are not included in the appraisal framework.

Contextual characteristics	
	Number of economically active and inactive populations <sup>61</sup>
	Gender breakdown of employed population <sup>62</sup>
	Breakdown of occupation by sector <sup>63</sup>

### Description

#### The number of employee jobs

In 2017, Southwark held over 235,000 “employee jobs” within its boundaries. This is an increase of 19% from the 2013 figure of 197,000. These figures however exclude self-employed people, government supported trainees and HM Forces. The total amount of jobs in Southwark came to 316,000 in 2017. This is up by 7% on the previous year in 2016, with 295,000 jobs in the borough.<sup>64</sup>

#### Number of micro and small-to-medium sized enterprises in the borough

<sup>58</sup> Nomis Labour Market Statistics, Local Authority Profile <https://www.nomisweb.co.uk/reports/lmp/la/1946157256/report.aspx>

<sup>59</sup> ibid

<sup>60</sup> ibid

<sup>61</sup> ibid

<sup>62</sup> ibid

<sup>63</sup> ibid

<sup>64</sup> ibid

Over 99% of the businesses in Southwark are micro and small-to-medium sized enterprises. This equated to a total of 15,905 micro-SMEs in 2018, having grown by 13% since 2015 from 14,095 businesses. Over the same period, the largest percentage increase was in medium-sized businesses (employing 50-249 people), which grew by 16.2% from 310 to 370. Small sized-businesses (employing 10-49 people) grew by 8.6%, from 1490 to 1630, while micro-businesses (1 to 9 people) grew by 11.6% from 12,295 in to 13,910. Large businesses (employing 250 people or more) account for 0.7% of the borough's total, at 110. The total number of businesses in Southwark (in 2018) is 16,015.<sup>65</sup>

### **Number of economically active and inactive populations**

Nearly three quarters (73%) of people in Southwark are aged 16-64 i.e. the age where they can be economically active between April 2018 and March 2019. Of this percentage, 82% of 16-64 year olds are economically active. 18% of people aged 16-64 are economically inactive, accounting for 41,700 people. This is lower than the London average of 22%. The largest sections of the borough's population that are economically inactive are 14,700 students, making up 35%. 17% are homebound with domestic and family duties (at 7000 people) while 26% are long term sick (10,600 people).<sup>66</sup>

### **Gender breakdown of employed population**

The comparison of employment statistics between genders reveals that the proportion of females in employment has been consistently less than males, either as employees or self employed. For example, 81% of economically active males in Southwark are in employment, compared with 74% of females. The difference between genders in the proportion of people that are employees (as opposed to self-employed) isn't so stark, with 60% of males, compared to 61% of females. However, 20% of economically active males are self employed, whereas 13% of economically active females are self employed.<sup>67</sup> The proportion of economically active females that are unemployed is less than males, at 5% vs. 6%, 2018-2019.<sup>68</sup>

### **Breakdown of occupation by sector**

The largest sector of employment in Southwark is "professional occupations." This amounts to 31% of all jobs in the borough. This is 4% higher than London as a whole and 10% higher than Great Britain as a whole. This is followed by "associate technical and professional", at 24%. The third largest is "managers, directors and senior official," making up 13% of employment in the borough.<sup>69</sup>

Several other occupation groups, namely "elementary occupations", "caring leisure and other service occupations" and "administrative and secretarial" are all around 6-8%, making up the next largest sectors of employment in Southwark.<sup>70</sup>

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<sup>65</sup> Ibid.

<sup>66</sup> Ibid.

<sup>67</sup> Ibid.

<sup>68</sup> Ibid.

<sup>69</sup> Ibid.

<sup>70</sup> Ibid.

## Percentage of unemployed population

Of people who are economically active in Southwark, 5.4% are unemployed, this compares to 4.9% in London and 4.1% in the UK as whole. 4% are claiming out-of-work benefits, compared with 3% for London and UK as a whole.<sup>71</sup> Under Universal Credit a broader span of claimants are required to look for work than under Jobseeker's Allowance. As Universal Credit Full service is rolled out in particular areas, the number of people recorded as being on the claimant count is therefore likely to rise.<sup>46</sup> In Southwark, 3.8% of residents 16+ are claimants of Universal Credit, this is higher than the average for London at 3.0%.<sup>72</sup> Of residents who are aged 50+, the proportion of out-of-work benefits rises to 5.4%, which is higher than the London average of 3.5%.<sup>73</sup>

## Issues

- The unemployment rate among economically active population in Southwark is higher than the London and national averages.
- Higher proportion of residents aged over 50 on out-of-work benefits in Southwark across London
- Higher proportion of residents aged over 16 claiming Universal Credit in Southwark across London

## Data gaps and updates

None identified.

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<sup>71</sup> Ibid.

<sup>72</sup> Ibid.

<sup>73</sup> Ibid.

## Retail and town centres

### Overview

#### Baseline indicators

The following indicators are used to character economy and employment in Southwark and included in the sustainability appraisal framework.

Baseline indicators	
	Percentage of takeaways outlets within a walking distance (400m) of a secondary school
	Primary shopping frontage vacancy rates <sup>74</sup>
	Secondary shopping frontage vacancy rates <sup>75</sup>

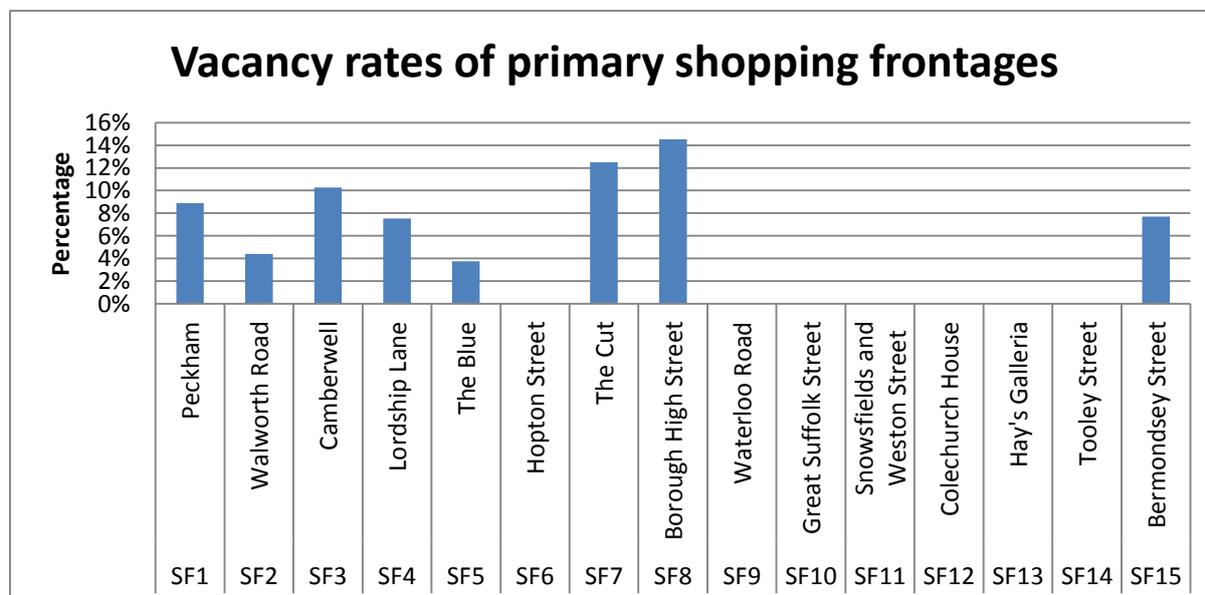
#### Contextual characteristics

The following contextual characteristics are used to give an overall description of employment and business in the borough. These are not included in the appraisal framework.

Contextual characteristics	
	Existing commercial floorspace in town centres, district centres and local centres <sup>76</sup>
	Breakdown of commercial uses in town centres

### Description

#### Primary shopping frontage vacancy rates



<sup>74</sup> LB Southwark, 'Protected Shopping Frontages 2018' (published 2018)

<sup>75</sup> Ibid.

<sup>76</sup> LB Southwark, Place & Health Improvement Section, Southwark Public Health, *P45 Hot Food Takeaways – Review of the evidence*, (September 2018), 17

## Secondary shopping frontage Vacancy rates

Schedule ID	Name	Vacancy rate (%)
SF16	Dockhead	10%
SF17	Jamaica Road	0%
SF18	Jamaica Road	3%
SF19	Albion Street	0%
SF20	Harper Road	33%
SF21	Tower Bridge Road	10%
SF22	Lower Road and Plough Way	11%
SF23	Walworth Road, East Street and Camberwell Road	7%
SF24	Old Kent Road, East Street and Dunton Road	16%
SF25	Ilderton Road	0%
SF26	Maddock Way	0%
SF27	Peckham Park Road and Old Kent Road	29%
SF28	Camberwell	10%
SF29	Vestry Road	0%
SF30	Peckham	16%
SF31	Queens Road	7%
SF32	Bellenden Road	5%
SF33	Gibbon Road	0%
SF34	Evelina Road, Nunhead Green and Kirkwood Road	11%
SF35	Grove Vale	13%
SF36	East Dulwich Road	8%
SF37	Crosswaithe Avenue	0%
SF38	Lordship Lane	13%
SF39	North Cross Road	7%
SF40	Herne Hill	0%
SF41	Half Moon Lane	0%
SF42	Norwood Road	4%
SF43	Dulwich Village and Calton Avenue	0%
SF44	Dulwich Village	6%
SF45	Lordship Lane	11%
SF46	Forest Hill Road	14%
SF47	Forest Hill Road	18%
SF48	Lordship Lane	0%
SF49	Croxted Road and Park Hall Road	17%
SF50	Seeley Drive	10%
SF51	Nunhead Grove and Nunhead Lane	14%
SF52	Camberwell New Road	34%

## **Percentage of takeaways outlets within a walking distance (400m) of a secondary school**

According to the evidence informing New Southwark Plan's P45 Hot Food Takeaways, out of the 302 takeaway outlets which are situated in ward areas with the prevalence of excess weight, 86 (at 30%) are within a walking distance (400m) of a secondary school.

The number of takeaways within a walking distance is higher for schools located in the north of the borough, which is also where some of the wards with the highest prevalence of excess weight are found, showing a potential correlation.

## **Existing commercial floorspace in town centres, district centres and local centres**

In 2014, Southwark has a total of 208,666 gross of retail floorspace (270,500 sqm including food and beverage) within its town centres and other undesignated clusters. 44% of the total gross retail floorspace is accommodated within food stores and convenience goods (essential every day items) shops, while 56% of retail floor space is for non-essential, comparison goods.<sup>77</sup> Southwark's town centres are partially defined by the existing amount of commercial floor space. These include:

- Major town centres: Peckham (56,630 sqm), Elephant and Castle/Walworth Road (44,460sqm) and Canada Water (36,668 sqm) or;<sup>78</sup>
- District centres: Borough/Bankside/London Bridge (25,268 sqm), Camberwell (17,780 sqm) and Lordship Lane (in Dulwich) with 15,330 sqm) or;<sup>79</sup>
- Local centres: Nunhead Green/Evelina Road, Dulwich Village or the Blue, Bermondsey

Southwark has around 60,000 sqm net of convenience sales floor space in its town centres, relatively evenly spread between them. Southwark is well served by convenience food "superstore" supermarkets (of over 2,500 sqm net), having five within it's boundaries as well as having 8 large supermarkets over 1,000 sqm net, and ten between 500 sqm net and 1,000 sqm net.<sup>80</sup>

Comparison goods floor space (items such as clothes, shoes, music and books) is estimated to be approximately 93,100 sqm net across the borough. Peckham is the main centre for comparison goods floor space, taking 21% of the share. 18% lies in Elephant and Castle/Walworth Road, and 15% in Canada Water. Outside of the town centres Old Kent Road accounts for fewer than 19% of comparison sales floor space.<sup>81</sup>

Peckham, Elephant and Castle/Walworth Road and Canada Water all have a similar proportion of comparison goods shops when compared with the national average. Borough/Bankside and London Bridge both have less than half the national average.

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<sup>77</sup> Nathaniel Lichfield & Partners, *Southwark Retail Study* (2015), 7

<sup>78</sup> Ibid. 9

<sup>79</sup> Ibid.

<sup>80</sup> Ibid. 22

<sup>81</sup> Ibid.

## **Breakdown of commercial uses in town centres**

In Southwark, there is currently a more balanced mix of commercial uses within the designated town centres. The Southwark Retail Study (2015) outlines the most recent data relating to commercial uses in the borough. Peckham has the highest proportion of A1 retail (71%) and A1 non-retail but a low proportion of drinking establishments (1%). 66% of units in Elephant and Castle/Walworth Road are A1 (with 51% retail and 15% non-retail). There are a smaller proportion of A1 units in Canada Water town centre (at 57%). The district town centres have a higher proportion of units in A3/A4/A5 units, totalling 34.4% versus the major town centres' average of 19% and local centres' 23%. The current retention rate for food and beverage expenditure varies across the borough from 52% to 60% in different areas. While this is reasonably high, there is scope to increase the retention rate through new development.<sup>70</sup>

Use Class A2 equates to "financial and professional services." This includes banks, building societies, estate agents and employment agencies as well as betting shops and pay day loan shops. As of 2015, they account for 9% of all units in Southwark's town centres. They make up a slightly higher proportion of units in district and local centres, at 10%, than in major centres where they occupy 8% of units.<sup>72</sup>

Southwark's 43 betting shops which are located within town centres account for 26% of all A2 uses and 2.4% of all A Class units. This is significantly higher than the national average of 1.5%. Peckham, Walworth Road, Camberwell and the Blue together have 28 betting shops between them, taking up the majority share of the borough's stock. 11 of Southwark's 15 payday loan shops are also concentrated in Peckham, Walworth and Camberwell.<sup>73</sup>

Southwark's 37 banks/building societies are concentrated in Peckham, Borough/Bankside and Camberwell, together having 18 of the 37 units in those town centres. Estate agents are also concentrated in Borough/Bankside and Camberwell; however the highest concentrations are in Canada Water and Lordship Lane. Together, these estate agents account for 36% of all A2 units in the borough's town centres, and 3.2% of all A Class units.<sup>74</sup>

### **Issues**

- The concentration of takeaway outlets in proximity to secondary schools remains a critical threat to children obesity in Southwark

### **Data gaps and updates**

None identified

# Energy and Climate Change

## Overview

### Baseline indicators

The following indicators were used to characterise energy use and carbon emissions in the borough and included in the sustainability appraisal framework.

Baseline indicators	
1) Consumption of gas and electricity	Energy consumption by sector <sup>82</sup> (Domestic and Industry/commerce)
	Domestic consumption per capita of natural gas <sup>83</sup>
	Domestic consumption per capita of electricity <sup>84</sup>
2) Carbon dioxide emissions	Total carbon emissions in the borough <sup>85</sup>
3) Fuel poverty	Number of households experiencing fuel poverty <sup>86</sup>

### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
1) Consumption of gas and electricity	Consumption of domestic energy between lighting and appliances <sup>87</sup>
	Frequency of energy contracts (LASER) <sup>88</sup>
	Council expenditure on gas and electricity <sup>89</sup>
2) Carbon dioxide emissions	Carbon emissions breakdown by household ownership type (CO <sub>2</sub> ) <sup>90</sup>
	Carbon emissions breakdown by sector (CO <sub>2</sub> ) <sup>91</sup>
	Carbon emission breakdown by source (CO <sub>2</sub> ) <sup>92</sup>
	CO <sub>2</sub> Baseline data taken from Carbon Reduction Committee Baseline 2018 and new proposed targets <sup>93</sup>
3) Decentralised energy options	Number of households attached to SELCHP <sup>94</sup>

<sup>82</sup> Department for Business, Energy and Industrial Strategy (BEIS), 'UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2017 – data tables' (published June 2019)

<sup>83</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>84</sup> *ibid*

<sup>85</sup> LB Southwark, 'Scrutiny Committee Briefing: Climate Strategy – progress update' (published 24<sup>th</sup> September 2019)

<sup>86</sup> LB Southwark, 'Annual Public Health Report for Southwark 2019 (published February 2019)

<sup>87</sup> *ibid*

<sup>88</sup> LB Southwark, 'Scrutiny Committee Briefing: Climate Strategy – progress update' (published 24<sup>th</sup> September 2019)

<sup>89</sup> LB Southwark, 'Climate Emergency Summit' (published 1 July 2019)

<sup>90</sup> LB Southwark, 'Energy and Carbon Reduction Strategy' (adopted September 2011)

<sup>91</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>92</sup> LB Southwark, 'Energy and Carbon Reduction Strategy' (adopted September 2011)

<sup>93</sup> LB Southwark, 'Scrutiny Committee Briefing: Climate Strategy – progress update' (published 24<sup>th</sup> September 2019)

<sup>94</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

## Description

### 1) Consumption of Gas and Electricity

#### Energy consumption by sector (Domestic and Industry/commerce)

In total 507.5 k2CO<sub>2</sub> were consumed for industry and commercial sectors in 2017 and 312.5 kCO<sub>2</sub> for domestic sector in the most recent time period of 2017 as shown in **Table 2**. This is a 45% reduction in industry and commercial sector over the ten-year time period from 2007 to 2017, and a 37% reduction in the domestic sector over the same period.

Comparison between **Table 1** and **Table 2** shows percentage change in **Table 3**. Whilst in total industry and commercial have seen a greater reduction, domestic has experienced a decrease of 17% in gas use, whereas industry and commercial have seen an increase in gas. This could be for a shift to renewable energy sources more prevalent in domestic sources.

	Industry and Commercial (k2CO <sub>2</sub> )	Domestic (k2CO <sub>2</sub> )
Electricity	727.7	256.9
Gas	182.0	235.5
Total	925.9	496.3

Table 1: 2007 breakdowns between consumption of gas and electricity for industry and commercial versus domestic uses in Southwark (k2CO<sub>2</sub>)<sup>95</sup>

	Industry and Commercial (k2CO <sub>2</sub> )	Domestic (k2CO <sub>2</sub> )
Electricity	307.7	113.4
Gas	190.1	195.1
Total	507.5	312.5

Table 2: 2017 breakdowns between consumption of gas and electricity for industry and commercial versus domestic uses in Southwark (k2CO<sub>2</sub>)<sup>96,97</sup>

Percentage Change 2007 to 2017 levels	Industry and Commercial (% change in (k2CO <sub>2</sub> ))	Domestic (% change in k2CO <sub>2</sub> )
Electricity	- 57.69%	-55.85%
Gas	4.26%	-17.16%
Total	-45.19%	-37%

Table 3: Percentage change from 2007 to 2017 figures representing fuel breakdown between consumption of gas and electricity for industry and commercial versus domestic uses in Southwark (k2CO<sub>2</sub>)<sup>98,99</sup>

<sup>95</sup> Department for Business, Energy and Industrial Strategy (BEIS), 'UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2017 – data tables' (published June 2019)

<sup>96</sup> ibid

<sup>97</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>98</sup> Department for Business, Energy and Industrial Strategy (BEIS), 'UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2017 – data tables' (published June 2019)

<sup>99</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

## Consumption of domestic energy between lighting and appliances

The majority of energy (81%) consumed in a home is used either for space heating or heating water. The remainder is split between lighting (16%) appliances and cooking (3%).<sup>100</sup>

## Frequency of energy contracts (LASER)

Southwark currently spends around £50.3m over a 4 year contact on gas and electricity, and through the LASER contract and on average, those sites that utilise our energy contracts are currently saving 38% on gas prices (operational), 41% on gas prices (housing), and 17% on electricity prices (housing) and 11% on electricity prices (operational) compared to individual procurements<sup>101</sup>.

National Grid's high voltage electricity overhead transmission lines / underground cables within Southwark's administrative area form an essential part of the electricity transmission network in England and Wales including a 275kV underground cable from Newcross substation (on the Old Kent Road) in Southwark to Wimbledon substation in Wandsworth as well as existing gas holders on the same site on the Old Kent Road.

## Domestic consumption per capita of electricity and natural gas

The most recent figures are the April 2010- March 2011 Annual monitoring report<sup>102</sup>. The average total gas consumption per capita has decreased to 11,530kWh, and the average total electricity consumption per capita has fallen to 3,300kWh.<sup>103</sup> Domestic consumption per capita of natural gas and electricity is below the national average in Southwark of 16,000 and 4,800 respectively.<sup>104</sup>

	April 2010 – March 2011 (kwh/ year)	April 2009 – March 2010 (kwh year)
Natural Gas	11,530	13,037
Electricity	3,300	3,778

Table 4: Domestic consumption per capita of natural gas (kwh/year) in Southwark between April 2010 and March 2011.<sup>105</sup>

## Council expenditure on gas and electricity

The Council's 2008 Private Sector Stock Condition survey estimated that it would cost £143 million if all remaining opportunities for these measures were carried out in the borough's 70,156 privately owned homes. This would reduce this sector's CO2 by 23% reduction (equivalent to 76,600 tCO2 pa– 4.5% of borough CO2).<sup>106</sup>

## 2) Carbon dioxide emissions

### Carbon emissions breakdown by household ownership type (CO2)

The majority of the remaining social-housing stock, which accounts for 5% of CO2' is managed by ten large Residential Social Landlords (RSL's) who regularly engage with the Council and who have strong drivers to reduce CO2 to tackle fuel poverty and increase the quality of their stock.

Tenure	Percentage of borough CO2	Number of Dwellings	Percentage of Stock
Council homes	12%	40,120	32%

<sup>100</sup> LB Southwark, 'Energy and Carbon Reduction Strategy' (adopted September 2011)

<sup>101</sup> LB Southwark, 'Scrutiny Committee Briefing: Climate Strategy – progress update' (published 24<sup>th</sup> September 2019)

<sup>102</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>103</sup> ibid

<sup>104</sup> ibid

<sup>105</sup> ibid

<sup>106</sup> LB Southwark, 'Scrutiny Committee Briefing: Climate Strategy – progress update' (published 24<sup>th</sup> September 2019)

RSL homes	2%	15,013	12%
Private Sector homes	16%	7,156	56%
Total	30%	125,289	100%

Table 4: Housing stock in Southwark split by tenure and percentage carbon emissions <sup>107</sup>

### Carbon emissions breakdown by sector (CO2)

	April 2010-March 2011 (tonnes of CO2)	April 2009 – March 2010 (tonnes of CO2)	April 2008 – March 2009 (tonnes of CO2)
Industry/commercial	789,000	925,000	927,000
Housing	456,000	502,000	504,000
Transport	258,000	265,000	281,000
Total	1,504,000	1,693,000	1,713,000
Per capita	5.3	6.0	6.1

Table 5: Total tonnes of carbon emitted in Southwark between April 2010 and March 2011 <sup>108</sup>

Carbon emissions in the borough reduced from 1,713,00 tonnes of CO2 from the period between April 2008-2009 to 1,504,000 tonnes of CO2 from April 2010-2011. This is a reduction of 13.8%, which indicate a consistent decline in carbon emissions. Southwark has declared a climate emergency, setting a target to reach carbon neutrality by 2030.

### Carbon emissions breakdown by source (CO2)

**Table 6** below gives a breakdown of where Carbon emissions come from in the borough indicating that workplaces are the biggest emitters and transport consisting of 15% of emissions.

Built Environment	84%	Transport	16%
Work places	54%	Cars and motorcycles	8%
Homes	30%	Freight	4%
		Public transport	3%
		Taxis	1%

Table 6: Percentage breakdown of carbon emissions between built environment and transport sectors in Southwark. <sup>109</sup>

### Total carbon emissions in the borough

In 2018, the Council's Carbon Reduction Committee provided updated Baseline tonnes of CO2, and proposed new reduction targets by respective years 2022, 2030 and 2050 targets as set out in the right hand column of the table below.

	Baseline (tCO <sub>2</sub> )	Current (tCO <sub>2</sub> )	Original target	Percentage Reduction to date	New proposed target
Council – operational estate and schools (2008/9 baseline)	41, 306	25,961 (2017/18)	26.6% reduction by 2016	36.7%	100% reduction by 2050

<sup>107</sup> LB Southwark, 'Energy and Carbon Reduction Strategy' (adopted September 2011)

<sup>108</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>109</sup> Southwark Energy and Carbon Reduction Strategy 2011

Council Housing (2005 baseline)	202,800	187,850	N/a	6.7%	50% reduction by 2022
Borough (2003 baseline)	1, 690 000	1, 671,020	80% reduction by 2050	1.1%	100% reduction by 2030

Table 7: CO<sub>2</sub> Baseline data taken from Carbon Reduction Committee Baseline 2018 and new proposed targets.<sup>110</sup>

The Council has been working towards the Council target of reducing the emissions from own operations by 50% by 2022, based on existing CRC baselines. The 2008 CO<sub>2</sub> baseline taken for the CRC was 41,306 tonnes per year. Against the same baseline, the figure for 2017-18 was 25,961 tonnes. This is a 36.7% reduction on 2008 and work is ongoing. We have largely achieved this through a mixture of energy efficiency, building improvements and capital investments and the consolidation of accommodation.

### Number of households experiencing fuel poverty

Fuel poverty is defined as spending more than 10% of disposable income on heating to minimal standard. Over 7,000 households in Southwark are living in fuel poverty (6.4% of all households). However fuel poverty is unequally distributed throughout the borough.<sup>111</sup>

## 3) Decentralised energy

### Number of households attached to SELCHP

The waste that cannot be recycled, reused, or recovered through processing in some way is incinerated at the SELCHP (South East London Combined Heat and Power) plant just across the border in Lewisham. This plant produces heating and hot water that supplies approximately **2,600** properties of nearby Southwark housing estates (fed from boiler houses at Abbeyfield, Clements Road, Pedworth and Tissington). The expansion of this network is being considered as part of a wider decentralised energy strategy and the regeneration of the Old Kent Road, exploring extending SELCHP links to Canada Water, Osprey Estate, the Old Kent Road Opportunity Area and Peckham.

No dwellings were added to SELCHP in 2018. Connecting more dwellings will be part of the work for 30 homes to be added in 2019.

### Issues

- CO<sub>2</sub> reduction is overall occurring in the borough, however not at a quick enough rate
- Industry and commercial sector has reduced by 45% in the period 2007-2017 whilst domestic has decreased by roughly 37%
- Smart metering could be a method towards continuing to reduce consumption
- Expanding our SELCHP heat networks towards Peckham and Canada Water requires more data and analysis, could involve heat metering to discourage wastage, could involve new technologies, could involve some long-term investment between partners (Veolia and Southwark)
- CO<sub>2</sub> tends to dominate the direction of clean energy policy and actions. On the other hand the impacts of NO<sub>x</sub> are proportionately underrated in decisions.
- Predominance of the Urban Heat Island will increase as development increases, localised figures are required to be developed
- Air Source Heat Pump is a project undertaken by the council to change carbon behaviours however this still needs to be better understood

<sup>110</sup> LB Southwark, 'Scrutiny Committee Briefing: Climate Strategy – progress update' (published 24<sup>th</sup> September 2019)

<sup>111</sup> LB Southwark, 'Annual Public Health Report for Southwark 2019 (published February 2019)

- With 86.5% of the borough's carbon emissions not directly controlled by the Council, meeting CO2 reduction targets will only be fully achieved by influencing the borough's businesses, residents, landlords and building owners<sup>112</sup>.

#### **Data gaps and updates**

- There is a lack of understanding of post-occupancy energy use and demand. Current decisions surrounding energy are based upon modelling of expected demand; however there is a discrepancy between modelling and real data. This understanding would provide more certainty to and build a stronger case for implementing decentralised and cleaner energy in the borough.
- Data needs to be updated
- Need a better understanding of the effects of climate change and adaptation measures at the local Southwark level.
- Data is needed to measure the proportion of energy generated from renewable sources.
- Data is needed to quantify energy efficiency and adaptation of existing building stock as per DECC, 2012.

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<sup>112</sup> LB Southwark, 'Energy and Carbon Reduction Strategy' (adopted September 2011)

## Air Quality

### Overview

#### Baseline indicators

The following indicators were used to characterise air quality in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Concentration level of NO <sub>2</sub> and PM <sub>10</sub> <sup>113</sup> (with PM <sub>2.5</sub> to be published soon)
	Percentage population exposed to levels of NO <sub>2</sub> above the annual average objective limits

#### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
1) Air Quality Monitoring	Air quality monitoring stations <sup>114</sup>

### Description

#### 1) Air Quality Monitoring

##### Air Quality monitoring stations

The council has installed two air quality monitoring stations in 2010 in the borough. These monitoring stations will collect information on NO<sub>x</sub> and PM<sub>10</sub> and are located at:

- Old Kent Road, by the gasworks
- Elephant and Castle, at St Mary's Newington Church Yard.

They measure air pollution every hour. They monitor Oxides of Nitrogen (NO + NO<sub>2</sub>, collectively referred to as NO<sub>x</sub>) and particulate matter (PM<sub>10</sub>). As of 2015, the Council has a duty to monitor PM<sub>2.5</sub>; however these figures have not yet been published.

##### Concentration level of NO<sub>2</sub> and PM<sub>10</sub><sup>115</sup> (with PM<sub>2.5</sub> to be published soon)<sup>116</sup>

An annual status update was provided in June 2019 for the previous year. In Southwark, in 2018, the number of exceedances of the hourly mean >200µg.m-3 objective permitted did not exceed 18, thus meet the NO<sub>2</sub> short term objective.

<sup>113</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>114</sup> LB Southwark, 'Movement Plan 2019' (adopted April 2019)

<sup>115</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>116</sup> *ibid*

The PM<sub>10</sub> annual mean concentrations meet the national air quality objective. There has been a slight upward trend of the annual mean concentrations over the past three years, but this year monitored levels have fallen.<sup>117</sup>

Southwark is not currently meeting legal limits for all pollutants regulated by EU legislation. NO<sub>2</sub> is a serious challenge as it often exceeds the objective limits, especially in the area inside the inner ring road and along main road corridors.<sup>118</sup> Table 8 below indicates the most recent Air Quality Monitoring figures for PM<sub>10</sub> and NO<sub>2</sub>, where the figures in bold exceed the annual mean Air Quality Objective of 40 (µg.m<sup>-3</sup>).

Annual Mean Concentration	2013	2014	2015	2016	2017	2018
PM <sub>10</sub> (µg.m <sup>-3</sup> ) (SWK6)	23	19	20	26	19	20
NO <sub>2</sub> ratified and bias adjusted monitoring results (µg.m <sup>-3</sup> ) (SWK6)	<b>42</b>	37	<b>41</b>	39	34	32

Table 8: Air Quality Monitoring for PM<sub>10</sub> and NO<sub>2</sub> from 2013 – 2018 period using SWK6 monitoring station.<sup>119</sup>

### Percentage of Southwark population exposed to levels of NO<sub>2</sub> exceeding the air quality objective

In 2013 45% of the population of Southwark was exposed to levels of NO<sub>2</sub> above the annual average objective limit. It is known that there is no 'safe' limit for PM, so even where the objective limits for PM fractions are not exceeded, a reduction in particulates would further protect human health.<sup>120</sup>

### Issues

- Air pollution levels for the borough overall exceed targets set by the Government in some instances, however not as an average.
- Transport contributes to the majority of pollution in the borough. This is particularly so, near large arterial roads throughout the borough and increased exposure to populations living within proximity to major roads, especially vulnerable groups such as children, the elderly and those with existing medical conditions. Air pollution has significant implications on health and life expectancy and is said to be the second largest contributor to deaths after smoking.
- Major hotspots for poor air quality are on the Transport for London Road Network, over which the borough has limited direct control. This reduces the borough's ability to improve air quality from vehicular traffic.
- Measures taken to reduce pollution, particularly targeting transport will have wider benefits to health, wellbeing and open spaces.

<sup>117</sup> LB Southwark, 'Air Quality Strategy & Action Plan (April 2017)' (published April 2017)

<sup>118</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>119</sup> *ibid*

<sup>120</sup> LB Southwark, 'Southwark Air Quality Annual Status Report 2018' (published June 2019)

**Data gaps and updates**

The two air quality monitoring stations used only provide details for those specific locations. To complement the stations, it is proposed to use the outputs from the council's traffic count programme to look at trends in road borne traffic. Although traffic counts do not directly measure air quality, they can be used as a proxy measurement if we assume that as traffic volume increases, air quality will decrease. No publicized data was found averaging current levels of PM<sub>2.5</sub>.

# Transport

## Overview

### Baseline indicators

The following indicators were used to characterise transportation in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Journey to work by mode <sup>121</sup>
	Frequency of Cycling as mode of transport in the borough <sup>122</sup>
	Number of Controlled Parking Zones
	Number of people killed or seriously injured in road accidents <sup>123</sup>

### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
1) Transportation patterns	Method of transportation
	Casualties
	Car ownership
2) Parking and Charging Points	Controlled Parking Zones
	Electric vehicles
3) Carbon Emissions	Transport-related CO <sup>2</sup>

### Description

Southwark adopted its Movement Plan in 2019. This document is supported by the most recent Annual Monitoring Report to Delivering the Transport Plan which was published in December 2018. The Movement Plan has replaced Southwark's Transport Plan (2010). The objectives of the Movement Plan include encouraging sustainable travel choices and promoting active lifestyles, increasing the share of walking and cycling trips, reducing the number of casualties and reducing CO<sup>2</sup> emissions from road transport. With an increasing population and workforce in Southwark, it will be important that development contributes towards shaping sustainable travel choices, reducing pollution and improving safety in the future.

<sup>121</sup> LB Southwark, 'Annual Monitoring Report 2017/18: Delivering Southwark's Transport Plan: A summary of the progress made in achieving the targets set out in the Southwark Transport Plan 2011' (published December 2018)

<sup>122</sup> LB Southwark, 'Movement Plan 2019' (adopted April 2019)

<sup>123</sup> LB Southwark, 'Annual Public Health Report for Southwark 2019' (published February 2019)

## 1) Transportation patterns

### Reduction of people killed or seriously injured in road accidents

There has been a 32% decline in people killed and seriously injured on the streets and only a 1% increase in slight injuries 2005-2009 average baseline. However, we support Vision Zero principles that no number of deaths or serious injuries is acceptable and the ambition set out in the MTS of reducing fatalities and serious injuries on our streets to zero.

The number of casualties in which people are killed or seriously injured (KSI) appears to be decreasing and number of slight and all casualties has been stationary in recent years. Casualties are higher than the inner and greater London borough averages. The number of cyclist casualties is increasing in line with the growth in cycling.

In total of 5,325 casualties were recorded in Southwark between 2012 to 2016 including, there were 417 serious casualties and 26 fatalities. Of these serious and fatal accidents, 25% involved a powered two wheeler rider, 30% involved a cyclist and 33% involved a pedestrian. 36 HGVs are involved in 58% of fatalities in Southwark. Generally, young people from 20 to 29 are most at risk and the number of casualties decrease with increasing age. Young males aged 16 to 24 years old on motorcycles are the most at risk.<sup>124</sup>

### Frequency of Cycling as mode of transport

Since 2006, private motor vehicle trips have been decreasing as a percentage of the total trips and the percentage of trips on rail and the underground/DLR has increased. Percentage trips on foot and by bus have remained fairly stable. Cycling levels in the borough have increased from 3.3% (2008/11 average) to 4.3% (2009/12 average) which equates to an additional 10,200 trips by bike per day.

### Journey to work by mode

88% of traffic on our streets is cars and taxis, with the remaining 12% being buses, vans and larger vehicles. There has been no real change to these numbers since 2010. TfL estimate that delivery and servicing movements by Light Goods Vehicles (LGV) are expected to grow by 22% by 2031. We need to manage trips carefully to ensure that safety is not compromised for people walking, cycling and using public transport. Our first step must be to look to reducing competition for space on our kerbside by lowering the amount of individual freight trips in the borough.

- Rail – 8%
- Underground/DLR – 8%
- Bus/tram – 24%
- Taxi/other public – 1%
- Car/motorcycle – 23%
- Cycle – 4%
- Walking – 30%

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<sup>124</sup> LB Southwark, 'Movement Plan 2019' (adopted April 2019)

## Car ownership

Car ownership is static in the general population but for young people it is decreasing as is attainment of driving licenses. People are starting to drive later and drive less when they do start. It is likely that this behaviour will remain throughout their lives.

Our aim is to reduce trips made by car/motorbike to 13% by 2041. To achieve this, we need to be more ambitious than we currently are. Steps we plan to take include:

- Introducing a borough wide CPZ;
- Supporting car clubs models that reduce car ownership;
- Reviewing parking charges to charge most polluting vehicles more; and
- Ensuring consistency in parking restrictions on our streets or on our housing estates.

## 2) Parking and Charging Points

### Electric vehicles

Electric vehicles (EV's) are an important and growing part of the vehicle fleet. EV's are about 20% more efficient than petrol vehicles, but there is no guarantee that they will reduce pollution. As emissions from tailpipes decrease as vehicle technology improves, particulates from brake and tyre wear become more important to address as an issue.

### Controlled Parking Zones

At the end of 2018 there were 25 CPZs in Southwark, covering approximately 800 streets and 48% of the borough. This is low by London standards.

The ULEZ will cover the Congestion Charging Zone and come into effect from 2020. Subject to public consultation, ULEZ would set an emissions requirement for all types of vehicles entering central London with charges for noncompliance, discouraging all but the cleanest vehicles. The Mayor's Transport Emissions road map has identified an opportunity to apply the principles of the ULEZ in other areas of London. This could be in the form of Low Emission Neighbourhoods (LENS), which would be targeted in local hotspot areas of poor air quality.<sup>125</sup>

## 3) Carbon Emissions

### Transport-related carbon emissions

Drivers of reductions in transport-related CO2 emissions include the on-going long-term trend of vehicle fuel efficiency improvements driven by EU legislation, regional measures to drive modal shift, the decarbonisation of grid electricity and related incentives for electric vehicles and UK policy to increase the share of bio-fuel in transport fuel from 5 to 10% in the lead up to the 2020 renewables target<sup>126</sup>. The council already has a comprehensive focus on encouraging modal shift. This includes managing demand via car clubs, investing in cycling and walking infrastructure, cycle parking and working with public transport providers; encouraging sustainable travel choices through school and workplace travel plans and encouraging smarter driving to reduce emissions and improve air quality<sup>127</sup>.

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<sup>125</sup> Mayor of London, 'Ultra Low Emission Zone for London' (2019)

<sup>126</sup> Government Office for Science, 'Future of Mobility: Decarbonising road freight' (published February 2019)

<sup>127</sup> LB Southwark, 'Movement Plan 2019' (adopted April 2019)

## **Issues**

- There is a need to alleviate current and future capacity on trains, DLR, buses and local roads ongoing discussions regarding the Bakerloo Line Extension into our Old Kent Road regeneration area may support this.
- Parking is an on-going issue. There is a need to reduce parking as a disincentive to drive and subsequently alleviate congestion and improve air quality. This may include reviewing parking hours and parking associated with developments.
- There is a need to further encourage active modes of transport, particularly for local trips.
- There is a need to address road space conflicts between cyclists, pedestrians and motorists. This is particularly pertinent for 'pinch points' which have been identified through modelling.
- Locations of end of trip facilities such as bicycle parking and electric vehicle recharge points is also another issue given space constraints.

## **Data Gaps and Updates**

A number of plans and strategies are currently being updated. These should be reviewed and incorporated in the sustainability appraisal and Local Plan evidence base. These include: The Road Safety Strategy and Parking Policy.

## Biodiversity

### Overview

#### Baseline indicators

The following indicators were used to characterise biodiversity in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Number of SINC sites <sup>128</sup>
	Number of Local Nature Reserve Sites <sup>129</sup>
	Number of New Protected Sites <sup>130</sup>

#### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
1) Biodiversity monitoring	Wildlife recording <sup>131</sup>

#### Description

Southwark has a rich ecological resource with 516 hectares natural greenspace within the borough, including the Thames. Southwark has over 215 parks and open spaces. Of these sites 65 are designated as Sites of Importance for Nature Conservation (SINC) including 7 Local Nature Reserves (LNR's). Not all are publically accessible as railsides, golf courses, allotments and private land are included.

### Biodiversity monitoring

#### Number of Local Sites of Importance for Nature Conservation (SINCs) in Southwark

There are 65 SINC sites in Southwark, 5 are of Metropolitan Importance, 17 are of Borough Grade 1 importance, 22 are of Borough Grade II importance and 28 are of Local Importance. Saved Southwark Plan policy 3.28 protects SINC sites from inappropriate development and seeks enhancements for these sites. The New Southwark Plan proposes to revise the SINC designations of Borough Grade I and Borough Grade II to just Borough Importance.

#### Number of Local Nature Reserve Sites

Southwark has 7 Local Nature Reserves (LNR's) totalling 50.93ha, these are listed below.

- Sydenham Hill Wood
- Nunhead Cemetery
- Lavender Pond
- Dulwich Upper Wood

<sup>128</sup> LB Southwark, 'Draft Biodiversity Action Plan 2020. Protecting Biodiversity and Making Nature Accessible for All' (in consultation 2019)

<sup>129</sup> ibid

<sup>130</sup> ibid

<sup>131</sup> ibid

- One Tree Hill
- Stave Hill Ecological Park
- Russia Dock Woodland

### Number of New Protected Sites<sup>132</sup>

Biodiversity Net Gain is one of the key themes of the Biodiversity Action Plan (2019), and the creation of new protected sites designation allocated as part of the New Southwark Plan has identified **17 new sites** for designation as SINC's. This works towards the overarching environmental strategy for the UK (BAP) 'A green future' 25 Year Environmental Plan (DEFRA 2018) has been adopted and contains key targets for biodiversity including creating a Nature Recovery Network.

Habitat	By 2025	By 2050
Species-rich woodland	20 ha	200 ha
Flower-rich grassland	50 ha	250 ha
Rivers and streams	10 km	40 km
Reedbeds	5 ha	30 ha

Table 9: Habitat creation targets for London

### Wildlife Recording<sup>133</sup>

Understanding what species are present is important in managing habitats and measuring success. To enable individuals and groups to share wildlife sightings Southwark Council has an interactive mapping tool. See link.

<https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Wildlife%20sightings%20and%20reporting>

Citizen science can also contribute to recording specific species.

Southwark Council has a Service Level Agreement with the London Records Centre, Greenspace Information for Greater London CIC (GiGL), which provides up to date data on species and habitats and land designations.

### Issues

Southwark Council declared a climate emergency in March this year; this is inexorably linked to the biodiversity crisis. Creation of green infrastructure can help adaptation and to mitigate the impacts of climate change.

### Data Gaps and Updates

None identified.

<sup>132</sup> ibid

<sup>133</sup> ibid

## Open Spaces

### Overview

#### Baseline indicators

The following indicators were used to characterise open spaces in the borough and included in the sustainability appraisal framework.

Baseline indicators	
1) Provision of open space	Number of Open Spaces per 1,000 people <sup>134</sup>
	Provision of Public Parks per 1,000 people <sup>135</sup>
	Number of Allotments (Community gardens) <sup>136</sup>
2) Satisfaction with open space	Satisfaction with natural greenspace provision

#### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
3) Open space monitoring	Predicted impact of population growth on open space provision <sup>137</sup>
	Areas of Deficiency in access to nature <sup>138</sup>

### Description

Southwark is a borough that has a wealth of open space of different types including woodland, parks, community farms, Thames-side paths, and sports pitches. The survey of open spaces we prepared for our Open Space Strategy (2013) identified 215 open spaces in the borough which together comprise some 605.5 hectares of land, around 21% of the total land area in the borough. Around 58% are publically accessible.

#### 1) Provision of open space

##### Number of Open Spaces per 1,000 people

Southwark has many natural greenspaces and sites of importance for nature conservation. As with public parks, levels of greenspace vary in different areas of the borough. The borough's natural greenspace standard is 1.5 hectares per 1,000 population. Greenspace standards for each sub-area at present are as follows<sup>139</sup>:

<sup>134</sup> LB Southwark, 'Open Space Strategy' (adopted 2013)

<sup>135</sup> *ibid*

<sup>136</sup> *ibid*

<sup>137</sup> *ibid*

<sup>138</sup> *ibid*

<sup>139</sup> *ibid*

- Aylesbury and Walworth: 2.24 ha
- Bankside, Borough and London Bridge: 1.22 ha
- Bermondsey and Old Kent Road: 0.36 ha
- Camberwell: 0.47 ha
- Canada Water and Rotherhithe: 4.44 ha
- Dulwich: 4.23 ha
- Elephant and Castle: 0.38 ha
- Peckham and Nunhead: 1.92 ha.

### **Provision of Public Parks per 1,000 people<sup>140</sup>**

Open space provides essential habitats for plants and wildlife, in turn improving soil regeneration, water absorption and filtration. The Open Space strategy (2013) identified that there is a total of 0.85ha of park provision per 1,000 population. This is expected to fall to 0.72ha of park provision per 1,000 population in 2026, taking into account the projected increase in population of 54,000 people between 2011 and 2026. The residents' survey revealed that Southwark has a relatively high level of satisfaction with the current levels of provision and quality of open space. When combined with the results of the benchmarking exercise of open space provision in other London authorities, it is considered that a standard of 0.72ha per 1,000 population is realistic. The sub-areas which fall below the 0.72ha per 1,000 population, and should be prioritised for additional park provision, are:

- Bankside, Borough and London Bridge;
- Bermondsey and Old Kent Road;
- Camberwell; and
- Elephant and Castle

### **Number of Allotments (Community gardens)**

Our site surveys have shown that about 15.3 ha of land across the borough is used for allotments and a further 2.9 ha is used as community gardens. The vast majority of allotment provision is located in the south of the borough, with 8.5ha located in Dulwich and 5.9ha located in Peckham and Nunhead. By contrast, the majority of community gardens are located in the north of the borough. Canada water and Rotherhithe is the only area with no provision.

## **2) Satisfaction with open space**

### **Satisfaction with the quality of open space**

A telephone survey carried out with the Open Space Strategy (2013) suggested that most people consider the quality of open spaces to be either good or very good, with highest satisfaction levels for allotments (92%), large open spaces (86%) and the Thames Path (88%).

### **Satisfaction with natural greenspace provision**

The Open Space strategy (2013) identified that there is a total of 1.79ha of natural greenspace provision per 1,000 population. This is expected to fall to 1.51ha of park provision per 1,000 population in 2026, taking into account the projected increase in population of 54,000 people between 2011 and 2026. The residents' survey revealed that

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<sup>140</sup> ibid

Southwark has a relatively high level of satisfaction with the current levels of provision natural greenspace and, as such, it is considered that a standard of 1.51ha per 1,000 population is realistic. The sub-areas which fall below the 1.51ha per 1,000 population, and should be prioritised for additional natural greenspace provision, are:

- Bankside, Borough and London Bridge;
- Bermondsey and Old Kent Road;
- Camberwell; and
- Elephant and Castle

### **3) Open space monitoring**

#### **Predicted impact of population growth on open space provision<sup>141</sup>**

The purpose of the standards identified in the Open Space Strategy 2013 is to give adequate levels of provision for each type of open space within the borough based upon the existing needs and future needs of the borough up to 2026. All current figures are expected to decrease per population access to open space due to projected increase in population of 54,000 people between 2011 and 2026.

#### **Areas of deficiency in access to nature<sup>142</sup>**

The Open Space strategy identifies that all residents within the borough should have access to areas of formal and informal play provision for children and teenagers within 400m from home. Accessibility standards for different types of children's play provision should follow the GLA guidance as follows:

- small areas of play for younger children (maximum 100m walk);
- local facilities (maximum 400m walk); and
- larger equipped areas of play for older children (maximum 800m walk).<sup>143</sup>

Deficiency in access is quantified on a case-by-case basis and is therefore not possible to integrate into a baseline indicator.

#### **Issues**

- There is a clear need for additional allotment space to meet unmet demand. The Open Space Strategy identified at least 797 people on the waiting list for allotment spaces in the borough. At most sites, the waiting list is up to 10 years, although there may be a limited number of sites where waiting lists are around 1-2 years.
- The projected increase in population will result in diminishing access to public open space per 1,000 population, which will require minimising through designation of new open space.
- The NSP has already proposed an addition of 17 protected sites of open space and these figures will be continuously reviewed throughout the adoption of the plan.

#### **Data Gaps and Updates**

As population projections change, figures in the baseline data tables will change. The adequate levels of increase in public open space provision are dependent on the responsiveness of population projections as part of regeneration and growth in the borough.

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<sup>141</sup> ibid

<sup>142</sup> ibid

<sup>143</sup> ibid

## Soil Overview

### Baseline indicators

The following indicators were used to characterise soil and contaminated land in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Number of open space (hectares per 1,000 people)

### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
Site Contamination	Remediation of previously contaminated sites <sup>144</sup>
	Potentially contaminated sites <sup>145</sup>

## Description

### Number of Open Spaces per 1,000 people

Open space is an important habitat for plants and wildlife, which in turn promotes soil regeneration, and its water absorption and infiltration. Southwark has many natural greenspaces and sites of importance for nature conservation. As with public parks, levels of greenspace vary in different areas of the borough. The borough's natural greenspace standard is 1.5 hectares per 1,000 population. Greenspace standards for each sub-area at present are as follows<sup>146</sup>:

- Aylesbury and Walworth: 2.24 ha
- Bankside, Borough and London Bridge: 1.22 ha
- Bermondsey and Old Kent Road: 0.36 ha
- Camberwell: 0.47 ha
- Canada Water and Rotherhithe: 4.44 ha
- Dulwich: 4.23 ha
- Elephant and Castle: 0.38 ha
- Peckham and Nunhead: 1.92 ha.

### Contaminated Land Remediation of previously contaminated sites

<sup>144</sup> ibid  
<sup>145</sup> ibid  
<sup>146</sup> ibid

Southwark's approach to contamination can be found in our Contaminated Land Inspection Strategy (2012-2017). To date we have successfully effected contaminated land remediation via the planning system and by voluntary remediation. We have implemented a system of work which ensures that all historically contaminated or Brownfield sites are properly investigated and remediated, where required, with responsibility to properly address contamination found lying initially with the owner and or the developer of the site.

### **Potentially Contaminated sites**

In 2008/9, a total of 2016 potentially contaminated sites were identified in Southwark through examination of historic maps and other database.

From the 2016 sites identified, 1356 were found to be subject to sites uses that were considered non-polluting or low risk such as offices, dry goods warehouses, finish clothes manufacturing etc.

### **Issues**

The decline in the industrial sector began around the 1950's. Today, Southwark is fast becoming one of London's most regenerated Boroughs with large projects covering over 40% of the Borough taking place in over eleven areas. The breadth and pace at which regeneration and development are taking place within the borough is having the consequential effect that much of the industrial and potentially contaminated land within Southwark is being investigated and remediated as a matter of course, through the planning process.

### **Data Gaps and Updates**

None Identified.

## Flood risk, water resource and quality

### Overview

#### Baseline indicators

The following indicators were used to characterise flood risk, water resource and quality in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Domestic Water Demand across the entire borough, as a proxy measure of water consumption (expected) <sup>147</sup>
	Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence & water quality grounds <sup>148</sup> (to be updated)
	Quality of water at consumer's tap (zones) – against National Standards (number of tests failed) Thames Water Aggregated <sup>149</sup>

#### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
Flood Risk	Defences against Thames Flooding <sup>150</sup>
	Surface Water Management <sup>151</sup>
Water Supply	Provider

### Description

#### Flood Risk

##### Defences against Thames flooding

Defences against Thames flooding is included in Southwark's Strategic Flood Risk Assessment (SFRA) and reflect policy from the Thames Catchment Flood Management Plan<sup>152</sup> and Thames Estuary 2100<sup>153</sup> will help manage flood risk from the Thames over the next 50 to 100 years. Whilst the Thames Barrier and flood walls along the riverside provide a degree of protection, consideration needs to be given to their potential failure or inability to contain very high floods as a result of climate change. Under the TE2100 plan, the recommended measures for defences within Southwark include:

<sup>147</sup> LB Southwark 'Old Kent Road Integrated Water Management Strategy (2018)' (published May 2018)

<sup>148</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

<sup>149</sup> DEFRA, 'Drinking Water Inspectorate's Annual Report (DWI)', *Data summary tables for Thames Water (TMS)* <http://dwi.defra.gov.uk/about/annual-report/2018/company-data/tms.pdf> (published 11 July 2019)

<sup>150</sup> LB Southwark 'Strategic Flood Risk Assessment (January 2017)' (published January 2017)

<sup>151</sup> *ibid*

<sup>152</sup> Environment Agency 'Managing flood risk through London and the Thames Estuary (TE2100 Plan) November 2012' (published November 2012)

<sup>153</sup> Environment Agency 'Thames Catchment Flood Management Plan (summary report December 2009)' (published December 2009)

- An ongoing programme of inspection, maintenance, repair and replacement of defences;
- Raising of all flood defences by up to 0.5 m by 2065; and
- Raising of all flood defences by an additional 0.5 m by 2100. This allows for projected increases in sea level to 2135.

## **Surface Water Management**

The Council has undertaken a Surface Water Management Plan<sup>154</sup> for the whole borough which includes consideration of flooding from sewers, drains, groundwater and runoff from land, small watercourses and ditches that occurs as a result of heavy rainfall. Analysis of the number of properties at risk of flooding has been undertaken for the rainfall event with a 1 in 100 probability of occurrence in any given year (1% Annual Exceedance Probability, AEP). A review of the results demonstrate that 33,220 residential properties and 2,870 non-residential properties could be at risk of surface water flooding of greater than 0.03m depth during a rainfall event with a 1 in 200 annual chance of occurring. Of those, approximately 560 residential properties and 80 non-residential properties are estimated to be at risk of flooding to a depth of greater than 0.5m during the same modelled rainfall event.

The northern half of the borough is within the Thames flood plain, which contains over two thirds of Southwark's properties in well established communities. A large part of the borough is located within the indicative flood zone 3, which has the highest level of risk. The flood plain area also contains major regeneration and growth areas of importance to Southwark and London. However, it should be noted that all of the land in the borough is defended by the Thames Barrier and defences so that the risk from tidal flooding is a residual risk.

## **Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence & water quality grounds<sup>155</sup>**

For the financial year 2008/2009, no planning permissions were granted contrary to Environment Agency advice on flooding or water quality grounds, reflecting the borough's positive approach to protecting the flood plain from inappropriate development. A more up-to-date review of any planning permissions granted contrary to the advice of the Environment Agency will be submitted when the analysis is completed.

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<sup>154</sup> LB Southwark 'Strategic Flood Risk Assessment (January 2017)' (published January 2017)

<sup>155</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

## Water Demand

### Domestic Water Demand across the entire borough, as a proxy measure of water consumption (expected)<sup>156</sup>

To remain sustainable London needs to reduce the level of water consumption per person. Currently the average Londoner consumes 164 litres/day (l/d) around 20 l/d, which is above the national average of 150 l/d<sup>157</sup>. Projections for population growth in London and in the wider south-east will mean that new strategic water resources will be required. The need for this is exacerbated by the climate change predictions of more sporadic and intense rainfall and a higher likelihood of droughts, as well as the need to protect the water environment following Water Framework Directive requirements.

Baseline water consumption has been estimated by considering the modelled demand information supplied by Thames Water. The data included daily demands for each District Metered Areas (DMAs) within the OKR OA. No more borough-specific data could be found. Domestic demand was at 111.33 and non-domestic demand at 35.65 litres per day

### Water supply Provider

Thames Water currently supplies water to Southwark. Thirty-five per cent of the water Thames water supplies is pumped from natural underground reservoirs called aquifers. The other 65 per cent is pumped from rivers. However, the vast majority of river water is supplied from aquifers, making groundwater the most important source of water.

Currently, all mains water is treated to drinking standard. This is an expensive and energy intensive process, particularly considering that at least 40% of water consumed in homes and workplaces does not need to be of drinkable quality (for example water used for flushing toilets, washing laundry and watering parks and gardens). The current policy target for major housing development is to achieve a potable water use target of 105 litres per person per day.

### Quality of water at consumer's tap (zones) – against National Standards (number of tests failed) Thames Water Aggregated<sup>158</sup>

There is also increasing awareness and concern about micro-pollutants such as pharmaceuticals, micro-plastics, endocrine disruptors and metals. The Priority Substances Directive supplements the Water Framework Directive by establishing environmental quality standards for 'priority substances' and 'priority hazardous substances'. There are already targets in place for some substances, with future targets agreed for additional substances. This list of substances is updated periodically and there are a number of additional substances on the watch list for potential future inclusion.

These targets have been set by DEFRA and tested for the number of times that they fail (Thames Water aggregated).

## Issues

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<sup>156</sup> LB Southwark 'Old Kent Road Integrated Water Management Strategy (2018)' (published May2018)

<sup>157</sup> Greater London Authority (GLA), New London Plan emerging 2019

<sup>158</sup> DEFRA, 'Drinking Water Inspectorate's Annual Report (DWI)', *Data summary tables for Thames Water (TMS)* <http://dwi.defra.gov.uk/about/annual-report/2018/company-data/tms.pdf> (published 11 July 2019)

The discrepancy between Southwark's maintenance target for water demand at 105 litres per day and what is currently being achieved from the study at 111.35 litres per day.

#### **Data Gaps and Updates**

- Water demand in Southwark was most recently modelled in regard to the Old Kent Road Opportunity Area<sup>159</sup>
- The baseline data does not yet exist for the entire borough but is an average of the entire opportunity area
- More detailed analysis will be required at a later stage in each growth area in order to determine the exact volumes, and detailed design of the required infrastructure undertaken
- A more up-to-date review of any planning permissions granted contrary to the advice of the Environment Agency on flood defence and water quality grounds will be submitted when the analysis is completed
- Water quality is aggregated to Thames Water source, therefore not taking into consideration private providers or issues that may arise specific to the transportation of water to Southwark's homes.

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<sup>159</sup> LB Southwark 'Old Kent Road Integrated Water Management Strategy (2018)' (published May2018)

## Waste Overview

### Baseline indicators

The following indicators were used to characterise waste in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Recycling and composting rate (%) <sup>160</sup>
	Amount of municipal waste diverted from landfill (recovery rate %) <sup>161</sup>
	Total household waste collected (tonnes) <sup>162</sup>

### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
Waste Processing	London Plan targets for waste processing <sup>163</sup>
	Targets of the Southwark waste management strategy 2003-2021 <sup>164</sup>
	Integrated Waste Management Facility (IW MF) <sup>165</sup>

## Description

### Waste processing

#### London Plan targets for waste processing

Government has set targets for local authorities to increase recycling rates and reduce the amount of waste going to landfill. The Mayor has also set waste targets for the borough through the London Plan including the need to allocate enough land to process at least 243,000 tonnes (municipal as well as commercial) of waste by 2016, at least 275,000 tonnes by 2021 and at least 343,000 tonnes of waste by 2031. This will help meet the London-wide target of processing at least 85% of the city's waste within London by 2020.

<sup>160</sup> LB Southwark 'Waste Management Strategy 2003-2021' (published 2003)

<sup>161</sup> ibid

<sup>162</sup> ibid

<sup>163</sup> Greater London Authority (GLA), New London Plan emerging 2019

<sup>164</sup> LB Southwark 'Waste Management Strategy 2003-2021' (published 2003)

<sup>165</sup> ibid

**Total household waste collected (tonnes)<sup>166</sup>, Recycling and composting rate (%)<sup>167</sup> and Amount of municipal waste diverted from landfill (recovery rate %)<sup>168</sup>**

The table below sets out the figures related to waste processing in Southwark between 2010/2011 and 2014/2015.

	2010/11	2011/12	2012/13	2013/14	2014/15
Total household waste collected (tonnes)	110,236	106,121	111,081	116,663	118,814
Recycling and composting rate (%)	25.14%	27.43%	30.41%	34.30%	34.58%
Amount of municipal waste diverted from landfill (recovery rate %)	63.34%	79.65%	69.49%	86.40%	95.29%

Source: Waste strategy and Policy – Targets and Performance

**Total household waste collected (tonnes)**

Total tonnes of household waste collected in 2014/15 were 118,814. This increase in waste is related to the increase in population. Targets of the Southwark waste management strategy 2003-2021 was that a reduction in the amount of municipal solid waste generated in Southwark to below 3% by 2005, and below 2% by 2010. In real terms, due to population growth the absolute amount of waste will rise but the strategy aims to deliver a decrease in the actual rate of growth.

**Recycling and composting rate (%)**

Most recent figures suggest that 34.58% was the recycling and composting rate in 2014/15. Targets of the Southwark waste management strategy 2003-2021 was that an achievement of 30% recycling and composting standards for household waste by 2010-11 and 40% by 2015-16 and 50% standards by 2020-21.

**Amount of municipal waste diverted from landfill (recovery rate %)**

Most recent calculations suggest that 95.29% of municipal waste was diverted from landfill in 2014/15. Targets of the Southwark waste management strategy 2003-2021 was that a recovery of value from 45% of municipal solid waste by 2010-11, 67% by 2015-16 and 75% by 2020-21.

<sup>166</sup> ibid

<sup>167</sup> LB Southwark 'Waste Management Strategy 2003-2021' (published 2003)

<sup>168</sup> ibid

## **Integrated Waste Management Facility (IWMF)**

Southwark is involved in a joint partnership to meet waste apportionment targets called the South East London Waste Joint Waste Partnership Group. Members of the group pool their apportionment requirements, allowing them collectively to meet their aggregated apportionment total is met. This is acceptable under the London Plan 2016 as boroughs are not required to meet either the municipal or commercial/industrial apportionment figures individually.

The IWMF has current actual throughput of 173,000 tonnes per annum (excluding the waste transfer and household waste reuse and recycling functions (2017 figure)). The proportion of the IWMF's waste processing capacity which contributes to the borough's apportionment target is, at 2016, 104,850 tonnes per annum (tpa). The borough's prescribed apportionment target is 172,000tpa, representing a shortfall of 67,150tpa in throughput capacity. According to the London Plan 2016, in 2036 the borough is required to have the capacity to meet an apportionment target of 247,000tpa. Where the modelled capacity of the IWMF at 2036 is 111,150tpa, there is an anticipated shortfall of 135,850tpa.

### **Issues**

No issues are identified

### **Data Gaps and Updates**

No data gaps are identified

## Noise Overview

### Baseline indicators

The following indicators were used to characterise noise monitoring in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	The rate of complaints about noise <sup>169</sup>

### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
Harm Caused by Noise	The percentage of the population exposed to road, rail and air transport noise of 65dB(A) or more, during the daytime <sup>170</sup>
	The percentage of the population exposed to road, rail and air transport noise of 65dB(A) or more, during the daytime <sup>171</sup>

## Description

### Noise Complaints

The rate of complaints about noise in Southwark is 18.7 per 1000<sup>172</sup> in 2015/16. This has been decreasing in recent years however is worse than both the London and National Average

### Issues

No issues

### Data Gaps and Updates

No data gaps

<sup>169</sup> Public Health England, 'Wider Determinants of Health' <https://fingertips.phe.org.uk/profile/wider-determinants/data#page/1/gid/1938133043/pat/6/par/E12000007/ati/102/are/E09000028> (accessed 29 November 2019)

<sup>170</sup> ibid

<sup>171</sup> ibid

<sup>172</sup> ibid

## Play facilities

### Overview

#### Baseline indicators

The following indicators were used to characterise play facilities in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Number of open spaces with play facilities <sup>173</sup>
	Level of satisfaction with children's play facilities <sup>174</sup>

#### Contextual characteristics

The following information provides contextual characteristics of the borough and is not included in the appraisal framework.

Contextual characteristics	
Play characteristics	Current participation rates in play <sup>175</sup>

#### Description

Open space provides an important role in serving children's play needs. It is widely acknowledged that the importance of children's play extends far beyond the activity itself. Play contributes towards child development through the development of a wide range of physical, social and emotional skills and abilities as well as having a positive impact on children's health. The Southwark Playing Pitch Strategy 2016, Southwark Physical and Activity and Sport Strategy (2014-2017), Southwark Health and Wellbeing Strategy (2015-2020) and Southwark Open Space Strategy (2013) inform policies for play facilities in the New Southwark Plan.

#### Current participation rates in play

The current participation rates indicate that 36.5% of adults (16+) participate in once a week sports, which is lower than the London average (37.4%) This has dropped in recent years from 40.4% in 2010/11.

#### Number of open spaces with play facilities

There are currently 78 open spaces that include some form of dedicated children's play provision, although there are a range of other amenity spaces which also include open space. Children need to be able to access play provision close to their home. Children find it difficult to travel long distances to use play areas, particularly if they have to cross busy roads. Lack of access to open space nearby, can mean that children have to rely on being supervised by parents or carers, which restricts a child's freedom to play.

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<sup>173</sup> LB Southwark, 'Open Space Strategy' (adopted 2013)

<sup>174</sup> LB Southwark 'Playing Pitch Strategy' (published January 2016)

<sup>175</sup> LB Southwark 'Southwark Physical and Activity and Sport Strategy (2014-2017)' (published 2014)

### **Level of satisfaction with Children's play facilities**

The telephone survey carried out with the Open Space Strategy (2013) suggested that over 80% of respondents consider the quality of children's play space in the borough to be good or very good. The increase in population expected over the coming years will put pressure on the supply of children's playspace and it will be important to ensure that adequate provision for playspace is made with new developments.

### **Issues**

No issues are identified.

### **Data Gaps and Updates**

No data gaps are identified

# Quality in Design and Conservation of Historic Environment

## Overview

### Baseline indicators

The following indicators were used to characterise quality in design and conservation of the historic environment in the borough and included in the sustainability appraisal framework.

Baseline indicators	
	Number of Historic environment assets (Conservation areas, listed buildings and monuments, and Archaeological Priority Zones) <sup>176</sup>

### Contextual characteristics

No further contextual characteristics of the borough are included in this section.

## Description

### Number of Historic environment assets (Conservation areas, listed buildings and monuments, and Archaeological Priority Zones)

Throughout the borough there are many attractive and historic buildings, monuments and sites that reflect Southwark's rich history and add to the unique character and identity of places. We currently have 45 conservation areas and around 2,200 listed buildings and monuments. The Tower of London, a World Heritage Site, is located across the river from London Bridge. There are also archaeological remains that cannot be seen that provide important evidence of our past. We have identified 6 Archaeological Priority Zones (APZs).

### Issues

Protecting and enhancing the character and historic value of places are important issues to be considered in the future growth and regeneration of the borough. Well designed buildings and spaces will help improve people's quality of life and make places more attractive. This can also help attract businesses to the area. It is important that the design of a development is carefully thought through and takes into account how the development is part of a wider place and how a place's uniqueness and historic value can be used to stimulate regeneration and improvements.

### Data Gaps and Updates

No data gaps are identified.

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<sup>176</sup> LB Southwark, 'Local Development Framework: Southwark Annual Monitoring Report 7 (April 2010 – March 2011)' (published 2011)

## **Conclusion**

**Only the baseline indicators have been selected for monitoring, as indicated and summarised in the following section.**

### **Data Gaps and Updates**

Southwark's source of baseline indicators is subject to internal review by the GLA.

## SOCIAL CONDITIONS

### Equality

Baseline data	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Index of multiple deprivation	43 <sup>rd</sup> most deprived out of 317 local authorities in England; 8 <sup>th</sup> most deprived among 14 inner London boroughs; 9 <sup>th</sup> out of 33 local boroughs in London	Lower ranking	-	-	English Indices of Deprivation 2019	Sep 2019	As available
The Income Deprivation Affecting Children Index 2019 (IDACI)	81 out of 166 lower-layer super output areas (LSOAs) fell into the 20% most deprived across the country	Decrease	-	-	English Indices of Deprivation 2019	Sep 2019	As available
The Income Deprivation Affecting Older People Index 2019 (IDAOP)	113 out of 166 lower-layer super output areas (LSOAs) fell into the 20% most deprived across the country	Decrease	-	-	English Indices of Deprivation 2019	Sep 2019	As available

## Housing

Baseline data	Southwark					Direction of change	London	National (England)	Source	Most recent data
Additional general housing needs	South East SHMA (2014): 1,647 units					Increase supply	-	-	South East London Strategic Housing Market Assessment (SHMA, (2014); Southwark's SHMA (2019)	Jul 2019
	Southwark SHMA (2019): 2,932 units									
Net affordable housing needs per year	Backlog needs from 2,934 concealed households					Increase supply	-	-	Southwark's SHMA (2019)	Jul 2019
	Backlog needs from 6,745 overcrowded households									
	Backlog needs from 2,336 homeless households who are currently living in temporary accommodation									
	3,943 newly forming households per annum									
	205 existing households falling into need for affordable homes per year									
	Annual supply of affordable homes: 1,436 units Net additional affordable homes need: 2,077 units									
Bedroom requirement by tenure	<b>(shortage/demand: -) (oversupply: +)</b>	<b>1 bed</b>	<b>2 beds</b>	<b>3 beds</b>	<b>4 beds</b>	Increase supply	-	-	Southwark's SHMA (2019)	Jul 2019
	<b>Social rent and sub-social rent</b>	+200 units	-659 units							
	<b>Intermediate housing</b>	Undersupply								
	<b>Market housing</b>	-20%	-30%	-34%	-16%					

## Education, skills and training

Baseline data	Southwark		Direction of change	London	National	Source	Most recent data	Frequency of collection
<b>NEETs</b> No and % of 16-17 year olds not in education, employment or training or whose activity is not known	520	9.9%	Decrease	4.8%	5.5%	NEET and participation: local authority figures, Department for Education	Jun 2019	Annual
No. and % of residents who have attained NVQ4 and above	149,200	64.6%	Increase	53.1%	39.3% (Great Britain)	NOMIS, Labour Market Statistics	Dec 2018	As available
No. and % of residents with no qualification	13,200	5.7%	Decrease	6.6%	7.8 (Great Britain)	NOMIS, Labour Market Statistics	Dec 2018	As available
No. of apprenticeships created within the borough	842 (41% of all apprenticeships created by London boroughs in 2016-2017)		Create another 2,500 Southwark apprenticeships	-	-	Southwark Skills Strategy	Jun 2018	As available
Education and skills deprivation (the higher rank the more deprived)	8 <sup>th</sup> out of 14 (Inner London)		Decrease	22 <sup>nd</sup> out of 33 (London Wide)	262 <sup>nd</sup> out of 317 (National)	English indices of deprivation, MHCLG	Sep 2019	Annual

## Health and well-being

Baseline data	Southwark		Direction of change	London	National	Source	Most recent data	Frequency of collection
Life expectancy at birth	Male life expectancy at birth	78.9 years	Increase	80.5 years	63 years	Public Health Outcomes Framework, Public Health England	2015 - 2017	Annual
	Female life expectancy at birth	84.4 years	Increase	84.3 years	64 years			
Healthy Life expectancy at birth	Male	62.4 years	Increase	63.9 years	63.4 years	Public Health Outcomes Framework, Public Health England	2015 - 2017	Annual
	Female	64.6 years	Increase	64.6 years	63.8 years			
Number of Excess Winter Deaths	45 (10.2%)		Decrease	27.1%	30.1%	Public Health Outcomes Framework, Public Health England	Aug 2017 – Jul 2018	Annually

Health deprivation and Disability (the higher rank the more deprived)	10 <sup>th</sup> out of 14 (inner London boroughs)	Decrease	28 <sup>th</sup> out of 33 (London wide)	211 <sup>th</sup> out of 317 (National)	English Indices of Deprivation	Sep 2019	Annual
Percentage of adult carers who have as much social contact as they would like	39.8%	Increase	35.6%	35.5%	Public Health Outcomes Framework, Public Health England	2016 - 2017	Annual
Percentage of adult social carers who have as much social contact as they would like	38.5%	Increase	41.4%	46%	Public Health Outcomes Framework, Public Health England	2017 – 2018	Annual
Number and percentage of Year 6 children who are overweight and obese	1,145 (39.8%)	Decrease	37.7%	34.3%	Public Health Outcomes Framework, Public Health England	2017 - 2018	Annual

## Safety

Baseline data	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection	
Recorded crime per 1000 population for headline offences	120 (2018-2019), 6 <sup>th</sup> highest among 13 inner London boroughs, 6 <sup>th</sup> in London	Decrease	99	84	Recorded crime data by Community Safety Partnership area, ONS	Jul 2018 - Jun 2019	Annual	
Crime deprivation (the higher rank the more deprived)	7th out of 14 inner London boroughs; 9th out of 33 London boroughs; 37th within England; 25 out of 166 Lower-layer Super Output Areas (LSOA) within Southwark are among the 10th most deprived area within England	Lower ranking	-	-	English Indices of Deprivation	Sep 2019	Annual	
Total No. of casualties in Southwark	Pedestrians: 234 (-6% from 2017) Cyclists: 361 (12% from 2017)	Reduce to zero	175	144	-	Casualties in Greater London - Transport for London	2018	Annual
Fatal and serious casualties on road	189	Reduce to zero	123	-	-	Casualties in Greater London - Transport for London	2018	Annual
Local perception of safety and crime	Emerging	Emerging			Social Regeneration Charter	2019 and onwards	Emerging	

## Social cohesion

Baseline data	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Active member of their community	1 in 4 people	increase	-	-	Southwark Conversation	2018	As available
Feeling of contributing to the local economy	1 in 5 people	Increase	-	-	Southwark Conversation	2018	As available
Volunteer in Southwark	1 in 7 people	Increase	-	-	Southwark Conversation	2018	As available
Percentage of residents who feel wholly or partly positive about change in the borough	70%	Increase	-	-	Southwark Conversation	2018	As available
Percentage of residents who have personally benefitted from change in the borough	52%	Increase	-	-	Southwark Conversation	2018	As available

## ECONOMIC CONDITIONS

### Economy and employment

Baseline data	Southwark			Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of employee jobs	235,000			Increase	-	-	Nomis Labour Market Statistics, Local Authority Profile	2017	Annually
Number of micro and small-to-medium sized enterprises	99% of the total business in the borough, equating a total of 15,905 micro-SMEs			Increase			Nomis Labour Market Statistics, Local Authority Profile	2018	Annually
Percentage of unemployed population	5.4% unemployed	4% claiming out-of-work benefits	3.8% claiming Universal Credit	Decrease	4.9% unemployed	4.1%	Nomis Labour Market Statistics, Local Authority Profile	2019	Annually

## Retail and town centres

Baseline data	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Percentage of takeaways outlets within a walking distance (400m) of a secondary school	86 out of 302 (30%) takeaways (situated in ward areas with the prevalence of excess weight) are within a 400m walking distance of a secondary school	Decrease	-	-	Southwark Public Health, <i>P45 Hot Food Takeaways – Review of the evidence</i> , Southwark Place & Health Improvement Section	2018	As available
Primary shopping frontage vacancy rates	7 out of 15 having 0%	Decrease	-	-	Protected Shopping Frontages, Southwark	2018	As available
Secondary shopping frontage vacancy rates	11 out of 38 having 0%	Decrease	-	-	Protected Shopping Frontages, Southwark	2018	As available

## Environment conditions

### Energy and Climate Change

Objective & indicator for assessment	Southwark		Direction of change	London	National	Source	Most recent data	Frequency of collection
Energy Consumption by Sector	Industry and commerce	507.5	Decrease	-	-	UK Local Authority and Regional Carbon Dioxide Emissions National Statistics 2005 to 2017	2017	Annually
	Domestic Sector	312.5						
Domestic consumption per capita of natural gas	11,530 kwh/year		Decrease	-	16,000 kwh/year	Annual Monitoring Report 2010 - 2011	2010-2011	As available
Domestic consumption per capita of electricity	3,300 kwh/year		Decrease	-	4,800 kwh/year	Annual Monitoring Report 2010 - 2011	2010-2011	As available
Total Carbon emissions in borough(tonnes of CO2)	Industry/commercial	789,000	Decrease	-	-	Annual Monitoring Report 2010 - 2011	2010-2011	As available
	Housing	456,000	Decrease	-	-			
	Transport	258,000	Decrease	-	-			
	Total	1,504,000	Decrease	-	-			
	Per capita	5.3	Decrease	-	-			
Fuel Poverty	7,000 households (6.4% of all households)		Decrease	-	-	-	2013/14	As available

## Air Quality

Objective & indicator for assessment	Southwark		Direction of change	London	National	Source	Most recent data	Frequency of collection
Concentration level of NO <sub>2</sub> , PM <sub>2.5</sub> and PM <sub>10</sub> (Annual)	PM <sub>10</sub> (µg/m <sup>3</sup> ) (SWK6)	20	Decrease	-	40 µg/m <sup>3</sup>	Air Quality Annual Status Report	2019	Annually
	NO <sub>2</sub> ratified and bias adjusted monitoring results (µg/m <sup>3</sup> ) (SWK6)	32		-	40 µg/m <sup>3</sup>			
	PM <sub>2.5</sub> ratified and bias adjusted monitoring results (µg/m <sup>3</sup> ) (SWK6)	No published results		-	25 µg/m <sup>3</sup>			
Percentage population exposed to levels of NO <sub>2</sub> above the annual average objective limits	45%		Decrease	-	-	Air Quality Annual Status Report	2019	As available

## Transport

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Journey to work by mode	Car/motorcycle – 23% Taxi/other public – 1% Walking – 30%. Cycle – 4% Rail – 8% Underground/DLR – 8%	Decrease (Reduce trips made by car/motorbike to 13% by 2041)	-	-	LB Southwark, Annual Monitoring Report 2017/18: Delivering Southwark's Transport Plan	2017/18	As available
	88% of traffic on our streets is cars and taxis 12% is buses, vans and larger vehicles						
Frequency of Cycling as mode of Transport	4.3%	Increase	-	-	Movement Plan 2019	2009/12	As available
Number of Controlled Parking Zones	As of 2018, there are 25 CPZs in Southwark, covering approximately 800 streets and 48% of the borough	Increase (Introducing a borough wide CPZ by 2041)	-	-	Movement Plan 2019	2019	As available

Number of Casualties	A total of 5,325 casualties were recorded in Southwark between 2012 and 2016, including 417 serious casualties and 26 fatalities.	Decrease	Vision Zero (zero road casualties by 2041)	-	Movement Plan 2019	2012 to 2016	As available
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## Biodiversity

Objective & indicator for assessment	Southwark		Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of SINC Sites	Total	66	Increase	-	-	Open Space Strategy (2013)	2013	As available
	MOL	5						
	BOL Grade 1	17						
	BOL Grade 2	22						
	Local Importance	28						
Number of Local Nature Reserves	Southwark has 7 Local Nature Reserves (LNR's) totalling 50.93ha, these are listed below.		Increase	-	-	Biodiversity Action Plan 2019	2019	As available
Number New Protected Sites	17 new protected sites		Increase	Habitat creation targets for London (Table 9)	DEFRA 2018 ' A green future' 25 Year Environmental Plan	Biodiversity Action Plan 2019	2019	As available

## Open Spaces

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of Open spaces (hectares per 1,000 people)	215 open spaces in the borough which together comprise some 605.5 hectares of land, around 21% of the total land area in the borough  1.5 hectares per 1,000 population	Increase	-	-	Open Space Strategy (2013)	2026 – with projected increase in population	-
Park provision (hectares per 1,000 people)	0.7 hectares per 1,000 population	Increase	-	-	-	2026 – with projected increase in population	-
Satisfaction with natural greenspace provision	Satisfaction levels for allotments (92%), large open spaces (86%) and the Thames Path (88%).	Higher	-	-	Open Space Strategy (2013)	-	-
Number of Allotments (Community gardens)	15.3 ha of land across the borough is used for allotments and a further 2.9 ha is used as community gardens	Increase	-	-	Open Space Strategy (2013)	-	-

	797 people on the waiting list for allotment spaces in the borough	Decrease					
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## Soil

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of Open spaces (hectares per 1,000 people)	<p>215 open spaces in the borough which together comprise some 605.5 hectares of land, around 21% of the total land area in the borough</p> <p>1.5 hectares per 1,000 population</p>	Increase	-	-	Open Space Strategy (2013)	2026 – with projected increase in population	As available

### Flood Risk, Water Resources and Quality

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Domestic Water Demand across the whole borough (as a proxy measure of water consumption)	111.33 litres per person per day (Old Kent Road)	Decrease (105 litres per person per day)	164 litres per person per day (emerging New London Plan consumption levels)	-	Old Kent Road Integrated Water Management Strategy	2018	As available
Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence & water quality grounds	None	Decrease	-	-	Annual Monitoring Report 2010/2011	2010/11	As available
Quality of water at consumer's tap (zones) – against National Standards (number of tests failed) Thames Water Aggregated	15	Decrease	15		Drinking Water Inspectorate Annual Monitoring Report	2018	Annual

## Waste management

Objective & indicator for assessment	Southwark					Direction of change	London	National	Source	Most recent data	Frequency of collection
	2010/11	2011/12	2012/13	2013/14	2014/15						
Total household waste collected (tonnes)	2010/11	2011/12	2012/13	2013/14	2014/15	Decrease	Decrease	Decrease	Southwark's Waste Management Strategy 2003-2021	2014/2015	Annual
	110,236	106,121	111,081	116,663	118,814						
Recycling and composting rate (%)	25.14	27.43	30.41	34.30	34.58	Increase	Increase	Increase	Southwark's Waste Management Strategy 2003-2021	2014/2015	Annual
Amount of municipal waste diverted from landfill (recovery rate %)	63.34	79.65	69.49	86.40	95.29	Increase	Increase	Increase	Southwark's Waste Management Strategy 2003-2021	2014/2015	Annual

## Noise management

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
The rate of complaints about noise	18.7	Decrease	14.6	6.3	Wider Determinants of Health – Public Health England	2015/16	Annual
The percentage of the population exposed to road, rail and air transport noise of 65dB(A) or more, during the daytime	14.8%	Decrease	12.1%	5.5%	Wider Determinants of Health – Public Health England	2016	Annual
The percentage of the population exposed to road, rail and air transport noise of 55dB(A) or more during the night-time	18.0%	Decrease	15.9%	8.5%	Wider Determinants of Health – Public Health England	2016	Annual

## Play facilities

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of Open spaces with play facilities	78 open spaces that include some form of dedicated children's play provision	Increase	-	-	Open Space Strategy (2013)	2013	As available
Satisfaction level with children's play spaces	80% of respondents consider the quality of children's play space in the borough to be good or very good	Increase	-	-	Open Space Strategy (2013)	2013	As available

## Quality in Design and Conservation of Historic Environment

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of Historic environment assets	45 conservation areas	Retain	-	-	Annual Monitoring Report 7 (April 2010-March 2011)	2010/11	As Available
	2,200 listed buildings						
	Tower of London World Heritage Site						
	6 Archaeological Priority Zones						

## Appendix 4 – Sustainability Appraisal Framework

The following section sets out the appraisal framework for each sustainability objective by providing a list of prompt questions, which are used to elaborate the desired outcomes of achieving the objective and thus guide the assessment of policies set out in New Southwark Plan. To review the policies after they are implemented, a set of indicators are proposed in the right column to serve as the proxy measures for each objective's outcome.

IIA Objective	Prompt questions	Indicators/targets to monitor the effectiveness of the policy
<b>IIA01</b>		
To tackle poverty and encourage wealth creation	> Will it improve the range of job opportunities for all people?	<ul style="list-style-type: none"> <li>• <b>Increase</b> number of employee jobs</li> <li>• <b>Increase</b> number of micro and small-to-medium sized enterprises</li> <li>• <b>Decrease</b> percentage of unemployed population</li> <li>• <b>Decrease</b> primary shopping frontage vacancy rates</li> <li>• <b>Decrease</b> secondary shopping frontage vacancy rates</li> </ul>
	> Will it help to diversify the economy?	
	> Will it increase the number of higher paid jobs in the borough?	
	> Will it help reduce overall unemployment, particularly long-term unemployment?	
	> Will it encourage the retention and / or growth of local employment and training opportunities in the most deprived areas?	
	> Will it assist in providing land and buildings of a type required by businesses, for a range of employment uses?	
	> Will it reduce poverty in those areas and communities / equalities groups most affected?	
	> Will it improve access to low-cost transport and other facilities?	
	> Will it provide for successful neighbourhoods for all?	
	> Will it promote and enable tourism opportunities to be exploited, and employment created?	
> Will it result in a loss of employment land?		
<b>IIA02</b>		
To improve the education and skill of the population	> Will it provide opportunities to improve the skills and qualifications of the population, particularly for young people and adults?	<ul style="list-style-type: none"> <li>• <b>Increase</b> primary school places in accordance with the demand projections</li> <li>• <b>Increase</b> early education places in accordance with the demand projections</li> </ul>
	> Will it help improve employee education / training programmes?	

	> Will it help reduce skills shortages?	<ul style="list-style-type: none"> <li>• <b>Increase</b> the proportion and number of residents who attain an NVQ4 or above</li> <li>• <b>Reduce</b> the proportion and number of residents with no qualification</li> <li>• <b>Reduce</b> the number and proportion of 16-17 years old not in education, employment or training</li> </ul>
<b>IIA03</b>		
To improve the health of the population	> Will it promote and facilitate healthy living and active lifestyles amongst different groups?	<ul style="list-style-type: none"> <li>• <b>Increase</b> life expectancy at birth for males and females</li> <li>• <b>Reduce</b> the level of health deprivation and disability</li> <li>• <b>Increase</b> the percentage of adult carers who have as much social contact as they would like (as a proxy measure of social isolation)</li> <li>• <b>Increase</b> percentage of physically active adults</li> <li>• <b>Reduce</b> the number of excess winter deaths</li> <li>• <b>Reduce</b> the fraction of mortality attributable to particulate air pollution</li> <li>• <b>Higher</b> utilisation of outdoor space for exercise/health reasons</li> <li>• <b>Reduce</b> the number of reception year children: prevalence of overweight (including obesity)</li> <li>• <b>Reduce</b> the number of year 6 children: prevalence of overweight (including obesity)</li> <li>• <b>Increase</b> the percentage of people with high or very high life satisfaction</li> </ul>
	> Will it improve access to health and social care / treatment for all sectors of the community?	
	> Will it maintain, enhance and create green infrastructure assets (e.g. green space, woodlands, recreation and sports facilities and allotments) for recreation, exercise and access to locally produced food?	
	> Will it improve access to jobs for all and otherwise reduce poverty?	
	> Will it encourage a range and mix of land uses that underpin local health; for example avoiding over concentration of hot food takeaways in one location?	
	> Will it reduce the prevalence of takeaways near schools?	
	> Will it help improve mental and emotional health, reducing social exclusion?	
	> Will it promote non-polluting forms of transport?	
	> Will it reduce exposure to poor air quality across all groups?	
<b>IIA04</b>		
To reduce the incidence of crime and the fear of crime	> Will it improve safety and security?	<ul style="list-style-type: none"> <li>• <b>Reduce</b> the level of crime deprivation</li> <li>• <b>Reduce</b> Crime rate per 1000 of the population for key offences including burglary</li> <li>• Local perception of safety and crime (available when Social Research for Southwark's <b>Social Regeneration Charter</b> is published)</li> </ul>
	> Will it incorporate measures to reduce crime and the fear of crime, including anti-social behaviour?	
	> Will it provide for a well maintained and inclusive public realm and other public facilities?	
	> Will it encourage an active and connected, strong and cohesive community?	

IIA05		
To promote social inclusion, equality, diversity and community cohesion	> Will it help support the voluntary and community sectors?	<ul style="list-style-type: none"> <li>• <b>Improve</b> the borough's relative ranking for the indices of multiple deprivations</li> <li>• <b>Decrease</b> the percentage of children living in deprived households</li> <li>• <b>Decrease</b> the percentage of older persons living in deprived households</li> <li>• <b>Reduce</b> the gap in pay inequality</li> <li>• <b>Increase</b> the percentage of adult carers who have as much social contact as they would like (as a proxy measure of social isolation)</li> <li>• Perceptions of neighbourliness and how well local people get on well together (available when Social Research for Southwark's <b>Social Regeneration Charter</b> is published)</li> <li>• Local perception of the ability to have their voice heard and influence decisions (available when Social Research for Southwark's <b>Social Regeneration Charter</b> is published)</li> </ul>
	> Will it support active community engagement?	
	> Will it support a diversity of lifestyles and communities?	
	> Will it promote accessibility for those people who are elderly or disabled?	
	> Will it improve access to low-cost transport and other facilities?	
	> Will it help sustain the provision of community facilities and open space that meets local needs?	
	> Will it facilitate the connection of existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?	
	> How will different groups of people be affected by the option or policy - including black and minority ethnic communities, women, disabled people, lesbians, gay men, bisexual and transgender people, children and faith groups? Will it benefit the groups listed above?	
IIA06		
To mitigate impacts of and adapt to climate change	> Will it reduce CO2 and other greenhouse gas emissions?	<ul style="list-style-type: none"> <li>• <b>Decrease</b> energy consumption by sector (Domestic and Industry/commerce)</li> <li>• <b>Decrease</b> domestic consumption per capita of natural gas</li> <li>• <b>Decrease</b> domestic consumption per capita of electricity</li> <li>• <b>Decrease</b> local carbon dioxide emissions</li> <li>• <b>Decrease</b> the number of households experiencing fuel poverty</li> <li>• <b>Increase</b> recycling and composting rate (%)</li> </ul>
	> Will it reduce consumption of energy?	
	> Will it use renewable sources of energy?	
	> Will it help local people cope with hotter/drier summers and warmer wetter winters?	
	> Will it mitigate the urban heat island effect?	
	> Will it encourage the re-use of resources?	
	> Will it encourage water efficiency and drought resilience?	
IIA07		
To improve the air quality of Southwark	> Will it improve air quality?	<ul style="list-style-type: none"> <li>• <b>Decrease</b> concentration level of NO2, PM2.5 and PM10</li> <li>• <b>Decrease</b> percentage population exposed to levels</li> </ul>
	> Will it help to reduce emissions of PM <sub>10</sub> , PM <sub>2.5</sub> , NO <sub>2</sub> ?	
	> Will it help reduce concentration levels of PM <sub>10</sub> , PM <sub>2.5</sub> ?	

	and NO <sub>2</sub> ? > Will it minimise construction impacts such as dust, noise, vibration and odours? > Will it encourage a reduction in amount and length of journeys made by car thus generating lower emissions overall?	<ul style="list-style-type: none"> <li>of NO<sub>2</sub> above the annual average objective limits</li> <li><b>Increase</b> frequency of cycling as mode of transport in the borough</li> <li><b>Decrease</b> number of private vehicles (cars/ motorcycles) used as a journey to work by mode</li> </ul>
<b>IIA08</b>		
To avoid waste and maximise, reuse or recycle waste arising as a resource	<ul style="list-style-type: none"> <li>&gt; Will it promote the reduction of waste during construction / operation?</li> <li>&gt; Will it minimise the production of household and commercial waste?</li> <li>&gt; Will it promote sustainable processing of waste?</li> </ul>	<ul style="list-style-type: none"> <li><b>Increase</b> the amount of municipal waste diverted from landfill (recovery rate %)</li> <li><b>Increase</b> the recycling and composting rate (%)</li> <li><b>Increase</b> the number of buildings connected to SELCHP</li> </ul>
<b>IIA09</b>		
To encourage sustainable use of water resources	<ul style="list-style-type: none"> <li>&gt; Will it result in a net decrease in the demand for water and foul sewage disposal?</li> <li>&gt; Will it encourage reuse of water?</li> </ul>	<ul style="list-style-type: none"> <li><b>Increase</b> the quality of water at consumer's tap (zones) – against National Standards (number of tests failed)</li> <li><b>Reduce</b> domestic water demand (litres per person per day) as a proxy for Water consumption across the entire borough</li> </ul>
<b>IIA10</b>		
To maintain and enhance the quality of land and soil	<ul style="list-style-type: none"> <li>&gt; Will it result in the loss of open or previously undeveloped land?</li> <li>&gt; Will it promote re-use of previously developed land and buildings?</li> <li>&gt; Will it use land effectively and efficiently, including mixed use and higher density development?</li> <li>&gt; Will it encourage the remediation of land identified as potentially contaminated?</li> <li>&gt; Will it prevent further contamination of soils?</li> <li>&gt; Will it improve soil quality?</li> </ul>	<ul style="list-style-type: none"> <li><b>Increase</b> the number of open space (hectares per 1,000 people)</li> </ul>
<b>IIA11</b>		
To protect and enhance quality of landscape and townscape	<ul style="list-style-type: none"> <li>&gt; Will it conserve and enhance local landscape and townscape character and visual amenity?</li> <li>&gt; Will it improve the relationship between different buildings, streets, parks and waterways and other spaces that make up the townscape character?</li> </ul>	<ul style="list-style-type: none"> <li><b>Maintain</b> the number of historic environment assets</li> <li><b>Decrease</b> the percentage of takeaway outlets within a walking distance (400m) of a secondary school</li> <li><b>Decrease</b> primary shopping frontage vacancy rates</li> <li><b>Decrease</b> secondary shopping frontage vacancy</li> </ul>

	<p>&gt; Will it have a negative impact on important strategic/local views?</p>	<p>rates</p> <ul style="list-style-type: none"> <li>• <b>Increase</b> the number of open spaces per 1,000 people</li> <li>• <b>Increase</b> the hectares per 1,000 people of open spaces</li> <li>• <b>Increase</b> provision of public parks per 1,000 people</li> <li>• <b>Increase</b> publically accessible open space by area</li> <li>• <b>Increase</b> satisfaction with natural greenspace provision</li> <li>• <b>Decrease</b> the rate of complaints about noise</li> </ul>
	<p>&gt; Will it incorporate sustainable design and construction techniques?</p>	
<b>IIA12</b>		
To conserve and enhance the historic environment and cultural assets	<p>&gt; Will it protect, maintain and enhance the condition and setting of features and areas of cultural, historical and archaeological heritage in the environment?</p>	<ul style="list-style-type: none"> <li>• <b>Maintain</b> the number of historic environment assets</li> <li>• <b>Increase</b> the number of open spaces per 1,000 people</li> <li>• <b>Increase</b> the hectares per 1,000 people of open spaces</li> <li>• <b>Increase</b> provision of public parks per 1,000 people</li> <li>• <b>Increase</b> publically accessible open space by area</li> <li>• <b>Increase</b> satisfaction with natural greenspace provision</li> <li>• <b>Increase</b> the number of allotments (community gardens)</li> <li>• <b>Reduce</b> the number of people on the waiting list for allotment spaces in the borough</li> <li>• <b>Increase</b> number of open spaces with play facilities</li> <li>• <b>Increase</b> level of satisfaction with children's play facilities</li> <li>• <b>Decrease</b> the rate of complaints about noise</li> </ul>
	<p>&gt; Will it promote the historic environment and also contribute to better understanding of the historic environment?</p>	
	<p>&gt; Will it promote high quality design and sustainable construction?</p>	
	<p>&gt; Will it respect visual amenity and the spatial diversity of communities?</p>	
	<p>&gt; Will it maintain or increase access to leisure, sporting, cultural and arts destinations and facilities?</p>	
	<p>&gt; Will it improve leisure, sporting, cultural and arts provision?</p>	
<b>IIA13</b>		
To protect and enhance open spaces, green corridors and biodiversity	<p>&gt; Will it encourage development on previously developed land?</p>	<ul style="list-style-type: none"> <li>• <b>Increase</b> the number of open spaces per 1,000 people</li> <li>• <b>Increase</b> the hectares per 1,000 people of Open spaces</li> <li>• <b>Increase</b> provision of public parks per 1,000 people</li> </ul>
	<p>&gt; Will it improve the quality and access to open spaces in areas of deficiency?</p>	
	<p>&gt; Will it provide a range of play spaces for children and young people?</p>	

	<p>&gt; Will it maintain, enhance and create green infrastructure assets and networks (e.g. green space, woodlands, public rights of way, open recreation and sports recreation and sports facilities) across the area?</p> <p>&gt; Will it help protect and improve biodiversity in the area overall and in particular avoid harm to species and habitats protected by International and UK law?</p> <p>&gt; Will it protect and enhance natural habitats and protect priority species?</p> <p>&gt; Will it encourage the creation of new habitats, including through the provision of additional open space and green roofs?</p> <p>&gt; Will it help achieve the Biodiversity Action Plan (BAP) targets?</p> <p>&gt; Will it protect and provide opportunities for creating / enhancing / improving sites designated for their nature conservation value / geo-diversity level (local and national levels?)</p>	<ul style="list-style-type: none"> <li>• <b>Increase</b> publically accessible open space by area</li> <li>• <b>Increase</b> satisfaction with natural greenspace provision</li> <li>• <b>Increase</b> the number of allotments (community gardens)</li> <li>• <b>Reduce</b> the number of people on the waiting list for allotment spaces in the borough</li> <li>• <b>Decrease</b> the rate of complaints about noise</li> </ul>
<b>IIA14</b>		
To reduce vulnerability to flooding	<p>&gt; Will the development be an area at risk of flooding?</p> <p>&gt; Will it minimise the risk of and from flooding to people and property?</p> <p>&gt; Will it protect and improve flood defences and allow them to be maintained?</p> <p>&gt; Will it promote the use of sustainable urban drainage systems?</p>	<ul style="list-style-type: none"> <li>• <b>Reduce</b> the number of planning permissions granted contrary to the advice of the Environment Agency on flood defence &amp; water quality grounds</li> </ul>
<b>IIA15</b>		
To provide everyone with the opportunity to live in a decent home	<p>&gt; Will it improve the supply of housing?</p> <p>&gt; Will it contribute towards increasing the range of housing mix, sizes, tenures and affordability to meet the identified current and future needs of all social groups and local residents, including older households?</p> <p>&gt; Will it deliver 'healthy homes'? (e.g. in relation to warmth, overcrowding, noise and mental health?)</p> <p>&gt; Will it improve the quality of housing for all?</p>	<ul style="list-style-type: none"> <li>• <b>Contribute</b> towards the delivery of 2,932 additional homes in Southwark annually as informed by SHMA 2019</li> <li>• <b>Contribute</b> towards the provision of 2,077 net affordable homes in Southwark annually as informed by SHMA 2019</li> <li>• <b>Increase</b> delivery family-sized social housing tenure</li> <li>• <b>Reduce</b> the number of overcrowded households</li> </ul>

	> Will it improve overall design quality, including flexibility of stock to enable it to evolve to meet changing needs?	
<b>IIA16</b>		
To promote sustainable transport and minimise the need to travel by car	> Will it encourage development at locations that enable walking, cycling and / or the use of public transport and connected to local services and facilities?	<ul style="list-style-type: none"> <li>• <b>Reduce</b> the number of private vehicles used as journey to work by mode</li> <li>• <b>Increase</b> the frequency of cycling as mode of transport</li> <li>• <b>Increase</b> the coverage of controlled parking zones (CPZs)</li> <li>• <b>Reduce</b> the number of casualties</li> </ul>
	> Will it reduce car use?	
	> Will it reduce the number and length of journeys undertaken by car?	
	> Will it reduce road traffic accidents?	
	> Will it improve public transport?	
	> Will it promote walking and cycling?	
	> Will it allow people with mobility problems or a disability to access buildings and places?	
> Will it improve connections across the area to local services, facilities, places of employment and green infrastructure?		
<b>IIA17</b>		
To provide the necessary infrastructure to support existing and future development	> Will it provide enough social infrastructure and meet local needs?	<ul style="list-style-type: none"> <li>• A combination of above indicators used to measure are covered elsewhere</li> </ul>
	> Does the proposal explore opportunities for shared community use and co-location of services?	
	> Will it provide enough physical infrastructure?	
	> Will it provide enough green infrastructure?	

## Appendix 5: Assessment of the Area Visions and Site Allocations

The following tables set out the impacts identified through IIA of the area visions, proposals map and site allocation of the Main Modifications to the New Southwark Plan on the sustainability implications. Of the total 16 areas set out in the plan, each area and their respective site allocations is appraised against 17 sustainability objectives, encompassing economic, social and environmental aspects. Each objective is measured on a scoring scale (Key 1), with each grade assigned a numeric value, symbol and colour. Alongside the scoring, a detailed commentary on the policy is provided. Following the Inspector's letter (EIP14), each site allocation's sustainability appraisal has also been included below.

### Key 1: Individual scoring against each objective

Symbol and colour	Scoring Value (%)	Score	Description
✓✓	100	Major or direct positive	The proposed option/policy contributes significantly to the achievement of the objective.
✓	50	Minor or indirect positive	The proposed option/policy contributes to the achievement of the objective but not significantly or indirectly.
-	0	Neutral	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
x	-50	Minor or indirect negative	The proposed option/policy detracts from the achievement of the objective but not significantly.
xx	-100	Major or direct negative	The proposed option/policy detracts significantly from the achievement of the objective.
?	N/A	Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.

At the bottom of the table, there is an averaged scoring of the 17 objectives to indicate each strategic policy's and development management policy's overall efficacy in meeting the sustainability objectives. The colour bar below (key 2) divides the overall scoring into three categories from positive, neutral to negative.

### Key 2: Averaged IIA objectives scoring for each policy

Negative	Neutral	Positive
< 10 %	10 - 49%	50 - 100%

IIAO	Description	Aylesbury				Bankside and The Borough				Bermondsey				Blackfriars Road			
		Area wide	S	M	L	Area wide	S	M	L	Area wide	S	M	L	Area wide	S	M	L
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓
IIAO 2	To improve the education and skill of the population	✓	✓	✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓	-	✓	✓
IIAO 3	To improve the health of the population	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	-	✓✓	✓✓	✓	✓	✓	✓	✓	-	✓	✓✓	✓	x	✓	✓
IIAO 6	To reduce contributions to climate change	✓	✓	✓	✓	-	?	-	✓	-	-	-	✓	✓	?	✓	✓
IIAO 7	To improve the air quality	✓✓	-	✓✓	✓✓	-	?	-	✓	-	-	-	✓	?	?	-	?
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓✓	-	✓	✓✓
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
IIAO 14	To reduce vulnerability to flooding	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	✓	✓	✓
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	-	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	-	✓✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓
<b>Averaged Scoring</b>		<b>62%</b>	<b>18%</b>	<b>62%</b>	<b>65%</b>	<b>47%</b>	<b>30%</b>	<b>47%</b>	<b>56%</b>	<b>50%</b>	<b>24%</b>	<b>50%</b>	<b>59%</b>	<b>56%</b>	<b>20%</b>	<b>50%</b>	<b>56%</b>

IIAO	Description	Camberwell				Crystal Palace and Gipsy Hill				Dulwich				East Dulwich			
		Area wide	S	M	L	Area wide	S	M	L	Area wide	S	M	L	Area wide	S	M	L
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓	-	✓	✓	✓	-	✓	✓	✓	✓	✓	✓
IIAO 2	To improve the education and skill of the population	✓	-	✓	✓	-	-	-	-	✓	-	✓	✓	✓✓	✓	✓✓	✓✓
IIAO 3	To improve the health of the population	✓	-	✓	✓	✓	✓	✓	✓	✓	?	✓	✓	✓✓	✓	✓✓	✓✓
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	-	-	-	-	✓	✓	✓	✓	-	-	-	-
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	x	✓	✓✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
IIAO 6	To reduce contributions to climate change	✓	?	✓	✓	✓	-	-	✓	✓	-	-	✓	✓	-	-	✓
IIAO 7	To improve the air quality	✓	?	✓	✓	✓	-	-	✓	✓	-	-	✓	✓	-	-	✓
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	-	✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓	✓
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓
IIAO 14	To reduce vulnerability to flooding	✓	✓	✓	✓	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓	-	✓	✓
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	-	✓	✓✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓	-	✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓✓	✓	✓✓	✓✓
<b>Averaged Scoring</b>		<b>53%</b>	<b>6%</b>	<b>47%</b>	<b>59%</b>	<b>38%</b>	<b>18%</b>	<b>32%</b>	<b>38%</b>	<b>47%</b>	<b>25%</b>	<b>41%</b>	<b>47%</b>	<b>47%</b>	<b>21%</b>	<b>41%</b>	<b>47%</b>

IIAO	Description	Elephant and Castle				Herne Hill & North Dulwich				London Bridge				Nunhead			
		Area wide	S	M	L	Area wide	S	M	L	Area wide	S	M	L	Area wide	S	M	L
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓	✓✓	✓	✓✓	✓✓	✓	✓	✓	-
IIAO 2	To improve the education and skill of the population	✓✓	✓	✓	✓✓	-	-	-	-	✓✓	✓	✓✓	✓✓	-	-	-	-
IIAO 3	To improve the health of the population	✓	✓	✓	✓✓	✓	-	✓	✓	✓✓	✓	✓✓	✓✓	✓	-	✓	✓
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	-	-	-	-	-	-	✓	✓	-	-	-	-
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	x	✓	✓✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
IIAO 6	To reduce contributions to climate change	-	?	-	✓	✓	-	-	✓	?	?	-	✓	✓	-	✓	✓
IIAO 7	To improve the air quality	-	?	-	✓	✓	-	-	✓	?	?	-	✓	✓	-	✓	✓
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	-	✓	✓✓	✓	✓	✓	✓	✓✓	-	✓	✓✓	✓	✓	✓	✓
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓✓	-	✓	✓✓
IIAO 14	To reduce vulnerability to flooding	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓	✓
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	✓	✓	✓	✓	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	-	✓
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	-	✓	✓✓	✓	✓	✓	✓	✓✓	✓	✓✓	✓✓	✓	-	-	✓
<b>Averaged Scoring</b>		<b>50%</b>	<b>17%</b>	<b>41%</b>	<b>62%</b>	<b>35%</b>	<b>17%</b>	<b>29%</b>	<b>35%</b>	<b>57%</b>	<b>23%</b>	<b>50%</b>	<b>59%</b>	<b>38%</b>	<b>9%</b>	<b>29%</b>	<b>59%</b>

IIAO	Description	Old Kent Road				Peckham				Rotherhithe				Walworth			
		Area wide	S	M	L	Area wide	S	M	L	Area wide	S	M	L	Area wide	S	M	L
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	-	✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓
IIAO 2	To improve the education and skill of the population	✓	-	✓	✓✓	✓✓	✓	✓	✓✓	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓
IIAO 3	To improve the health of the population	✓✓	-	✓	✓✓	✓✓	✓	✓	✓✓	✓✓	-	✓✓	✓✓	✓	-	✓	✓
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	-	✓	✓✓	-	-	-	-	✓✓	-	✓✓	✓✓	✓	-	-	✓
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	-	-	✓✓	✓✓	x	✓	✓✓	✓✓	x	✓	✓✓	✓✓	x	✓	✓✓
IIAO 6	To reduce contributions to climate change	-	x	-	-	✓	-	-	✓	-	?	-	✓	✓	-	-	✓
IIAO 7	To improve the air quality	✓	✓	✓	✓✓	✓	-	-	✓	-	?	-	✓	✓	-	-	✓
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 9	To encourage sustainable use of water resources	?	?	?	?	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	✓	✓✓	-	-	-	-	✓✓	-	✓	✓✓	-	-	-	-
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	✓✓	-	✓	✓✓	✓✓	-	✓	✓✓	✓✓	✓	✓	✓✓
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	✓	-	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
IIAO 14	To reduce vulnerability to flooding	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓	✓	✓	✓	✓	✓
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓	✓✓	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓	✓
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓	-	✓	✓
<b>Averaged Scoring</b>		<b>69%</b>	<b>25%</b>	<b>53%</b>	<b>80%</b>	<b>59%</b>	<b>15%</b>	<b>41%</b>	<b>59%</b>	<b>65%</b>	<b>17%</b>	<b>56%</b>	<b>68%</b>	<b>50%</b>	<b>12%</b>	<b>35%</b>	<b>50%</b>

**Integrated Impact Assessment for:**

New Aylesbury Area Vision and NSP1A Aylesbury Action Area Core

IIAO	Aylesbury				NSP01A
	Area wide	S	M	L	
IIAO 1	✓✓	✓	✓✓	✓✓	✓✓
IIAO 2	✓	✓	✓	✓✓	✓
IIAO 3	✓✓	✓	✓✓	✓✓	✓✓
IIAO 4	✓	-	✓	✓	✓
IIAO 5	✓✓	-	✓✓	✓✓	✓✓
IIAO 6	✓	✓	✓	✓	✓
IIAO 7	✓✓	-	✓✓	✓✓	✓✓
IIAO 8	-	-	-	-	
IIAO 9	-	-	-	-	
IIAO 10	-	-	-	-	
IIAO 11	✓	✓	✓	✓	✓
IIAO 12	✓	-	✓	✓	✓
IIAO 13	✓	-	✓	✓	✓
IIAO 14	✓	-	✓	✓	✓
IIAO 15	✓✓	-	✓✓	✓✓	✓✓
IIAO 16	✓✓	-	✓✓	✓✓	✓✓
IIAO 17	✓✓	✓	✓✓	✓✓	✓✓
Avg.	62%	18%	62%	65%	62%

Aylesbury Area Vision						
IIA Objective	Description	Area-wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	The area-wide redevelopment will revitalise the neighbourhood with an improved living environment that will encourage inward investment and boost local economy such as retail uses serving the local community.
		✓✓	✓	✓✓	✓✓	The growing population under the intensification and revitalisation of the existing residential area will produce economic synergy with the proximate Old Kent Road Opportunity area by creating new job opportunities for local residents and providing enterprise opportunities in the business area.
	<b>Average Scoring</b>	✓✓	✓	✓✓	✓✓	
IIAO 2	To improve the education and skill of the population	✓	✓	✓	✓✓	The area vision will see three new high-performing schools in addition to existing primary schools as part of the area-wide redevelopment to provide opportunities to improve skills of the population, particularly for young people and adults.
IIAO 3	To improve the health of the population	✓✓	✓	✓✓	✓✓	The area vision looks to deliver excellent design that expresses timeless quality and variety within buildings and public spaces in between, contributing to the sense of different districts and to the health and well-being of communities across the development area.
		✓✓	✓	✓✓	✓✓	It enhances connectivity within the area and with the surrounding area by improving walking and cycling networks and public spaces, which in turn encourages active travel and social interaction, and improving the health and well-being of the communities.
	<b>Average Scoring</b>	✓✓	✓	✓✓	✓✓	
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	-	✓✓	✓✓	Aligning with the strategic and development management policies in the plan, it will deliver mixed communities on different income levels and social backgrounds with the tenure-blind approach and at least 50% affordable housing with preference to social rented housing.
		✓✓	-	✓✓	✓✓	Recognising the potential of regeneration with new residents whilst protecting existing communities, the redevelopment will offer a range of housing tenures and sizes, phased over a number of years, to attract and facilitate existing residents to

						stay and benefit from the improved connections, facilities and communities.
		✓✓	-	✓✓	✓✓	<p>A wide range of community infrastructure will be provided to serve the area, including schools, re-landscaped Burgess Park and sports facilities and a local hub in the vicinity of East Street and Thurlow Street to promote social interaction, participation and cohesion among residents on different backgrounds.</p> <p>The vision seeks to reinforce its image as a place for families to live and deliver an excellent range of quality public and private open spaces, and will provide new local opportunities for shopping and employment in Thurlow Street and East Street, as well as supporting existing town centres.</p>
	<b>Average Scoring</b>	✓✓	-	✓✓	✓✓	
<b>IIAO 6</b>	To reduce contributions to climate change	-	?	-	✓	The growth in population under the area-wide regeneration place additional pressure on energy consumption. However, aligning with strategic polices and development management policies in the plan, new developments are required to achieve excellent building standards and design to achieve sustainability and energy efficiency. In addition, the densification of existing land uses supported by high accessible public transport can achieve better energy efficiency with mass transportation as compared to journeys made by private cars. Therefore, the cumulative impacts are uncertain on reducing contributions to climate change.
		✓✓	✓	✓✓	✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
	<b>Average Scoring</b>	✓	✓	✓	✓	
<b>IIAO 7</b>	To improve the air quality	✓✓	-	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars and concentration of air pollutants due to the green infrastructure effectively absorbing greenhouse gases. It will significantly contribute to improving air quality and health of the communities.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	-	-	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.

IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	It promotes the re-use of previously developed sites which may provide opportunities to remediate contaminated land but soil quality is unlikely to significantly improve due to fewer largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	Development will be respectful to the designations of conservation areas and strategic viewing corridors where they apply. All existing open space is due to be retained whilst new open space proposed will encourage urban greening and landscape enhancements. Enhanced high-quality public realm where redevelopment occurs should provide for a much-improved townscape.  The vision also requires any development to follow the View Management Guidance in Annex 1 for the One Tree Hill and Nunhead Cemetery borough views to protect borough views.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	All existing open space is due to be retained and the vision requires that development increases or improves the number and quality open spaces. This provides the opportunity to create new habitats which will enhance biodiversity.  The vision seeks the delivery of the three green fingers which will run from Burgess Park into the Action Area Core connecting with Surrey Square Park, the Missenden Play area and Faraday Gardens and providing important public space.
IIAO 14	To reduce vulnerability to flooding	✓	-	✓	✓	Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. Meanwhile, NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	-	✓✓	✓✓	It delivers homes and a wider urban environment suitable for residents at all stages in their lives, encouraging people to live and work locally. This will include excellent cycling provision, safe secure streets with good building frontages and a choice of homes including a range of different sized homes, generous space standards and provision of specialist housing.
		✓✓	-	✓✓	✓✓	Aiming to deliver regeneration that works for all, the redevelopment will provide a range of housing tenures and sizes to attract both new and existing residents, phased over a number of years to facilitate existing residents to move in to benefit the improved connections, facilities and communities.
	<b>Average Scoring</b>	✓✓	-	✓✓	✓✓	
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	-	✓✓	✓✓	The proximity to Elephant and Castle Tube and train stations provides high accessibility to public transport, supported by enhanced cycling and walking networks and improved public space, will effectively encourage active travel modes and use of mass transportation. This in turn will reduce the need of travelling by

						motor vehicles.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	A wide range of infrastructure, serving economic, social and environmental purposes, will be delivered through the area-wide redevelopment that will increase the capacity in supporting the existing and new residents and fostering cohesive and well-connected communities.

NSP1A Aylesbury Action Area Core				
IIA Objective	Description	Averaged Grading	Sub Grading	Commentary
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The redevelopment has already provided new facilities for residents and will continue to revitalise the neighbourhood with an improved living environment that will encourage inward investment and boost local economy such as retail and community uses serving the local community.
			✓✓	The growing population under the intensification and revitalisation of the existing residential area will produce economic synergy with the proximate Old Kent Road Opportunity area by creating new job opportunities for local residents and providing enterprise opportunities in the business area.
<b>IIAO 2</b>	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction will provide training in construction. The provision of new jobs through the new facilities delivered will provide the opportunity for people to develop their skills.
			✓	The area will see new high-performing schools, one of which has already been delivered in addition to existing primary schools as part of the area-wide redevelopment to provide opportunities to improve skills of the population, particularly for young people and adults. A new library has also been delivered providing the opportunity for learning.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Redevelopment should deliver excellent design, quality and variety within buildings and public spaces in between, contributing to the sense of different districts and delivering high quality homes will improve the health and well-being of communities.
			✓✓	A high quality pedestrian environment and improved landscaping with tree-lined streets should be delivered with a new local hub. Development should provide landscaping, public spaces and parks for the benefit of local residents, improving the health and well-being of the communities.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓	✓	Improved permeability through the delivery of excellent design, in accordance with the 'design out crime principles', will encourage street level activities, which in turn provide natural surveillance to reduce the perception of crime and incidence of crime.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Aligning with the strategic and development management policies in the plan, it will deliver mixed communities on different income levels and social backgrounds with the tenure-blind approach and at least 50% affordable housing with preference to social rented housing.

			✓✓	Recognising the potential of regeneration with new residents whilst protecting existing communities, the redevelopment will offer a range of housing tenures and sizes, phased over a number of years, to attract and facilitate existing residents to stay and benefit from the improved connections, facilities and communities.
			✓✓	A wide range of community infrastructure will be provided to serve the area, including schools, re-landscaped Burgess Park and sports facilities and a local hub in the vicinity of East Street and Thurlow Street to promote social interaction, participation and cohesion among residents on different backgrounds.
IIAO 6	To reduce contributions to climate change	✓✓	-	The growth in population under the area-wide regeneration place additional pressure on energy consumption. However, aligning with strategic policies and development management policies in the plan, new developments are required to achieve excellent building standards and design to achieve sustainability and energy efficiency. In addition, the densification of existing land uses supported by high accessible public transport can achieve better energy efficiency with mass transportation as compared to journeys made by private cars. Therefore, the cumulative impacts are uncertain on reducing contributions to climate change.
			✓✓	It creates an opportunity to take a holistic approach to enhancing environment and networks for cycling and walking through the area-wide master planning to encourage active travel modes as an alternative to the usage of private car, which in turn significantly reduces contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	In short term, air quality may be negatively impacted due to construction, where mitigation measures will be implemented. In long term, excellent design delivered through new developments within buildings and space in between will provide green infrastructure and encourage active travel modes including walking and cycling, which will in turn reduce the usage and emission of private cars and concentration of air pollutants due to the green infrastructure effectively absorbing greenhouse gases. It will significantly contribute to improving air quality and health of the communities.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	It could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development is in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	It promotes the re-use of previously developed sites which may provide opportunities to remediate contaminated land but soil quality is unlikely to significantly improve due to fewer largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	Development will be respectful to the designations of conservation areas and strategic viewing corridors where they apply. All existing open space is due to be retained whilst new open space proposed will encourage urban greening and landscape enhancements. Enhanced high-quality public realm where redevelopment occurs should provide for a much-improved townscape.

IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	All existing open space is due to be retained and the development should increase or improve the quality open spaces where possible. This provides the opportunity to create new habitats which will enhance biodiversity.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. Meanwhile, NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.</p> <p>A Flood Risk Assessment was undertaken with the original outline permission which was approved in August 2015 (14/AP/3844). It set out the development is located within defended tidal Flood Zone 3a as identified by the Environmental Assessment and SFRA. The sequential test confirms that the site will have a “more vulnerable” use mixed use (residential, employment and retail) in Flood Zone 3. Development on this site therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The Flood Risk Assessment confirmed that: the Comprehensive Development is identified within the SFRA and referenced as an area of deprivation when measured against a range of indicators including quality of environment, pollution and health. For this reason the Comprehensive Development is recognised by LBS as a ‘key’ regeneration area to provide ‘more and better quality homes, improved access to employment and public services and improved quality of the environment’.</p> <p>As such the Aylesbury AAAP was prepared and subsequently adopted to provide a framework by which the area will be developed over the coming years.</p> <p>LBS via their Core Strategy, SFRA and production of the AAAP have provided the required evidence that the Comprehensive Development will install overall betterment to the area. As such Part A of the exception test (‘demonstrate that the development provides wider sustainable benefits’) is deemed to be achieved. The FRA then provided the evidence to conclude Part B of the exception test (‘site specific flood risk assessment must demonstrate the development will be safe for its lifetime...without increasing flood risk elsewhere’).</p> <p>The overall development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>• At least 4,200 new high quality dwellings including social rented homes (replacing the existing council homes)</li> <li>• Excellent cycling provision, safe secure streets with good building frontages and a choice of homes with a priority for high quality social rented housing, including a range of different sized homes, generous space standards and provision of specialist housing;</li> <li>• Delivery of the three green fingers which will run from Burgess Park into the Action Area Core connecting with Surrey Square Park, the Missenden Play area and Faraday Gardens and providing important public space;</li> <li>• Establishing a local hub in the vicinity of East Street and Thurlow Street with a range of community facilities including a new Health Centre, Library, pharmacy, café, employment opportunities and a public square;</li> <li>• Delivery of a place for families to live and deliver an excellent range of quality public and</li> </ul>

				<p>private open spaces, and will provide new local opportunities for shopping and employment.</p> <p>The Officer's Report stated that the scheme is likely to increase the volume of run-of and impact upon the drainage system. This will require reconfiguration. Mitigation in the form of sustainable urban drainage systems including bio-retention areas, geo-cellular vaults and green roofs will need to be incorporated if the development is achieve a 50% reduction in run-off rates above existing in accordance with guidance in the Sustainable Design and Construction SPD (2009). Subject to conditions and a site wide drainage strategy officers are satisfied that measures can be put in place that to ensure the scheme achieves this standard.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It delivers high quality homes, including social rented homes and a wider urban environment suitable for residents at all stages in their lives, encouraging people to live and work locally. This will include excellent cycling provision, safe secure streets with good building frontages and a choice of homes including a range of different sized homes, generous space standards and provision of specialist housing.
		✓✓	✓✓	<p>Aiming to deliver regeneration that works for all, the redevelopment will provide a range of housing tenures and sizes to attract both new and existing residents, phased over a number of years to facilitate existing residents to move in to benefit the improved connections, facilities and communities.</p> <p>Policy P2 – new family homes and Policy P14 residential design both require higher standards for development coming forward in Aylesbury Action Area Core, a higher proportion of family homes is required as well as larger units to be similar to what was on the estate which will improve the quality of homes for residents.</p>
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The proximity to Elephant and Castle Tube and train stations provides high accessibility to public transport, supported by enhanced cycling and walking networks and improved public space, will effectively encourage active travel modes and use of mass transportation. This in turn will reduce the need of travelling by motor vehicles.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	A wide range of infrastructure, serving economic, social and environmental purposes, will be delivered through the area-wide redevelopment that will increase the capacity in supporting the existing and new residents and fostering cohesive and well-connected communities.

**Integrated impact assessment for**

**AV02 Bankside and the Borough Area Vision**

Including

- NSP01 – Site Bordering Great Suffolk Street and Ewer Street
- NSP02 – 62-67 Park Street
- NSP03 – 185 Park Street
- NSP04 – London Fire and Emergency Planning Authority
- NSP05 – 1 Southwark Bridge Road and Red Lion Court
- NSP06 – Landmark Court
- NSP07 – Land between Great Suffolk Street and Glasshill Street
- NSP08 – Swan Street Cluster - Site A, Site B and Site C
- NSP09 – 19, 21 and 23 Harper Road, 325 Borough High Street, 1-5 and 7-11 Newington Causeway

IIAO	Bankside and the Borough				NSP01	NSP02	NSP03	NSP04	NSP05	NSP06	NSP07	NSP08 Site A	NSP08 Site B	NSP08 Site C	NSP09
	Area wide	S	M	L											
IIAO 1	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 2	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 3	✓	✓	✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 4	✓	-	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 5	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 6	-	?	-	✓	✓	-	-	-	✓✓	-	-	✓✓	✓✓	✓✓	-
IIAO 7	-	?	-	✓	✓✓	✓	✓	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓
IIAO 8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 11	✓	✓	✓	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓
IIAO 12	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓
IIAO 13	✓	-	✓	✓	✓✓	✓	-	✓	✓✓	✓	✓	✓✓	✓✓	✓✓	✓
IIAO 14	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 15	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 16	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 17	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
Avg.	47%	30%	47%	56%	71%	59%	59%	65%	74%	65%	62%	79%	79%	79%	65%

Bankside & the Borough Area Vision and site allocations NSP01 – NSP09						
IIA Objective	Description	Area-wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	On employment sites the re-provision of at least the equivalent level of employment floorspace or 50% of the sites total development capacity is safeguarded, whichever is greater. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. The area vision looks to enhance the thriving economy by promoting it as an international destination for business headquarters as well as small businesses. The Bankside and the Borough area will capitalise upon the prosperous local tourism industry boosted by the town centre uses and active frontages proposed across many of the sites to create a vibrant urban area and generate a more diverse supply of local job opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	Provision of a new secondary school and sixth form proposed at NSP04 London Fire and Emergency Planning Authority site will create a more skilled and educated local population. Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓	✓	✓	✓✓	Enhancement of the low-line walking route, green links and planned cycle networks will promote active lifestyles and help reduce the causes and exposure to poor air quality. High density development envisaged will free up space and routes between building plots to improve legibility and promote social interaction. More job opportunities generated by employment space uplift and town centre uses will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Improved permeability and activation of frontages, particularly along the low-line route, will open up spaces to promote social interaction and the feeling of public safety.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	✓	✓	High quality and inclusive public realm enhancements will be accessible to all groups. Low-line, green links and planned cycle ways will create a more legible urban environment to avoid physical barriers and issues of severance. The provision of a new sports hall with the delivery of the new school at NSP04 could be accessible to the public during evenings and weekend, to increase provision of leisure/recreation space and become an important asset accessible to all groups of the local community.
IIAO 6	To reduce contributions to climate change	-	?	-	✓	Low-line, green links and planned cycle ways will promote active transport modes, improving air quality and mitigating greenhouse gas emissions. Despite excellent public transport links, the sub-area experiences some of the heaviest congestion in the borough, notably along Borough High Street stretching to London Bridge – CO2 emissions suffer as

						a result and these could be exacerbated by accelerated levels of construction and demolition. NSP policies will seek to minimise carbon dioxide emissions from development and encourage walking and cycling as an attractive alternative to motorised private or public transport.
<b>IIAO 7</b>	To improve the air quality	-	?	-	✓	Low-line, green links and planned cycle ways will promote active transport modes, helping to address the causes of poor air quality. Air quality in the area suffers as a result of high levels of congestion, notably along Borough High Street stretching to London Bridge, this could be exacerbated by accelerated levels of construction and demolition. NSP policies require air quality neutral standards to be met and development and improvements to air quality from development.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land but soil quality is unlikely to significantly improve due to fewer largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	Development will be respectful to the designations of conservation areas and strategic viewing corridors where they apply. All existing open space is due to be retained and the vision requires that development increase or improves the number and quality open spaces and the public realm. Enhanced high-quality public realm should provide for a much improved townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	Development will be respectful to the designations of conservation areas, listed buildings and archaeological assets and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	All existing open space is due to be retained and the vision requires that development increase or improve the number and quality open spaces. This provides the opportunity to create new habitats which will enhance biodiversity and reinforce the aspirations of the ecology restoration zones (River Thames Restoration Zone and Red Cross Gardens - and surrounds Restoration Zone).
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	-	✓	✓	The sites within Bankside and Borough are located in flood risk zones 3 benefitting from defences. This means that where more vulnerable sites are proposed the exception test will be required to assess the benefits of the development and the flood risk mitigation measures proposed  Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. Part of the east of the vision area falls within a Critical Drainage Area and therefore the impact of substantial development falling within this area would need to be closely investigated to ensure they will not significantly increase the risk of flooding elsewhere. NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	The area vision and site allocations should deliver a significant number of new homes across the area. If these are delivered to policy requirements they will offer a range of different units and tenures which will provide for a range of different needs and create inclusive residential schemes accessible to all groups.

<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	The vision area already benefits from excellent public transport connections, supporting the intensification of development. Low-line, green links, planned cycle ways and station access improvements will further promote active transport modes.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	Provision of a new secondary school and sixth-form proposed at NSP04: London Fire and Emergency Planning Authority will benefit new residents and the existing local community to foster a higher skilled and educated local population. The provision of new sports hall also on this site could be accessible to public during evenings and weekend, to increase provision of leisure/recreation space, presenting an important community asset. Green links and the planned cycle networks will enhance connectivity across the Bankside area.

NSP01 – Site Bordering Great Suffolk Street and Ewer Street				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	<p>An increase in high-quality and predominantly office accommodation will be important to support the growth of the local economy and bring increased job opportunities and prosperity to the area. A variety of town centre uses and retail should be accommodated at ground floor level to provide active frontages onto the Low Line walking route running alongside the railway viaduct, an undesignated heritage asset.</p> <p>The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.</p>
IIO 2	To improve the education and skill of the population	✓✓	✓✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIO 3	To improve the health of the population	✓✓	✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant
			✓✓	Encouraging delivery of the Low Line walking route creates improved accessibility and the quality of experience for walking. Improved walking networks encourage active travel and exercise, which is beneficial for health. Bringing more destinations closer to residents through strategic walking routes and improved accessibility, with improved pavements, crossings and public spaces encourage people to walk more. Measures to encourage walking can also help tackle social isolation and routes should accommodate parents and older or disabled people.
			✓✓	The area is currently well-serviced by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.
			✓✓	To provide new open space of at least 15% of the site area supports the current area (Bankside and the Borough) which is deficient in parks and other green spaces. New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialisation, nature conservation, food growing and cultural events. This will maintain and improve open spaces to ensure health and wellbeing benefits associated with these activities are accrued.
IIO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Increases in active frontages will encourage neighbourhood surveillance, which will improve feelings of safety in the area.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity within the area will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area..
			✓✓	Successful delivery of the Low Line walking route will ensure that the public space underneath railway arches which are traditionally attributed to crime, will be accessible and permeable therefore reducing crime in the area
IIO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunities for more families and individuals to reside in a prime location in the borough, near to employment opportunities.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	The site allocation proposes the creation of a new large open space. This will mitigate the pressure from development on existing open space and add to a sense of arrival to the neighbourhood, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	New community facilities will improve opportunities for social interaction and social cohesion in the area.
			✓✓	To provide new open space of at least 15% of the site area supports the current area (Bankside and the Borough) which is deficient in parks and other green spaces. New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialisation, nature conservation, food growing and cultural events. This will support community activities which encourage social inclusion, equality, diversity and community cohesion.
			✓✓	New walking routes, such as the site’s relationship with the Low Line, will encourage community interaction, equality and ease of accessibility throughout the area.
IIO 6	To reduce contributions to climate change	✓	✓	The provision of open space is valuable in supporting active travel and walking which has the potential to encourage a reduction in climate change. By reducing the intensity of carbon emissions released in a certain area contributes to better air quality.
IIO 7	To improve the air quality	✓✓	✓✓	A more walkable streetscape will improve and encourage active travel. New Open space further reduces the intensification of the land use and should improve the air quality, supporting biodiversity
			✓✓	The increased provision of open space will help absorb negative CO2 emissions and this will contribute to better air quality.
IIO 8	To avoid waste and maximise,	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate

	reuse or recycle waste arising as a resource			management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	An increase in high-quality and predominantly office accommodation will be important to support the growth of the local economy and bring increased job opportunities and prosperity to the area. A variety of town centre uses and retail should be accommodated at ground floor level to provide active frontages onto the Low Line walking route running alongside the railway viaduct, an undesignated heritage asset. Development will be respectful to the landscape and townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is not within a conservation area or within the proximity of listed buildings or undesignated heritage assets. The Low line walking route running alongside the railway viaduct is an undesignated heritage asset, which the site allocation has pointed out as must be incorporated and improved upon with any future redevelopment. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	To provide new open space of at least 15% of the site area supports the current area (Bankside and the Borough) will mitigate the pressure from development on existing open space. The site is large enough to accommodate a meaningful open space at an achievable level and it will mark an arrival point into Southwark.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 3) will have a “more vulnerable” use (mixed use including employment, town centre, residential uses and open space) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- An increase in high-quality and predominantly office accommodation will be important to support the growth of the local economy and bring increased job opportunities and prosperity to the area. A variety of town centre uses and retail should be accommodated at ground floor level to provide active frontages onto the Low Line walking route running alongside the railway viaduct, an undesignated heritage asset;</li> <li>- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.</li> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant</li> <li>- Encouraging delivery of the Low Line walking route creates improved accessibility and the quality of experience for walking. Improved walking networks encourage active travel and exercise, which is beneficial for health. Bringing more destinations closer to residents through strategic walking routes and improved accessibility, with improved pavements, crossings and public spaces encourage people to walk more. Measures to encourage walking can also help tackle social isolation and routes should accommodate parents and older or disabled people.</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> </ul>

				<ul style="list-style-type: none"> <li>- To provide new open space of at least 15% of the site area supports the current area (Bankside and the Borough) which is deficient in parks and other green spaces. New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialisation, nature conservation, food growing and cultural events. This will maintain and improve open spaces to ensure health and wellbeing benefits associated with these activities are accrued;</li> <li>- The site allocation proposes the creation of a new large open space. This will mitigate the pressure from development on existing open space and add to a sense of arrival to the neighbourhood, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- New walking routes, such as the site's relationship with the Low Line, will encourage community interaction, equality and ease of accessibility throughout the area;</li> <li>- The provision of open space is valuable in supporting active travel and walking which has the potential to encourage a reduction in climate change. By reducing the intensity of carbon emissions released in a certain area contributes to better air quality;</li> <li>- The increased provision of open space will help absorb negative CO2 emissions and this will contribute to better air quality;</li> <li>- The requirement to improve pedestrian movement and permeability through the site will enhance connectivity across the area, promoting healthy lifestyles and improving access to services.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Basement dwellings should not be permitted in this area.</p> <p>An application relevant to this site has currently submitted a FRA and identified key risks and mitigation:</p> <ul style="list-style-type: none"> <li>- Fluvial and Tidal flood risk from River Thames is low. Mitigation measures include good resilient measures are to be employed for areas below the maximum likely water levels for the 2100 breach event;</li> <li>- Flood risk of surface water runoff from surrounding land is low. Mitigation measures include new surface water network to be installed on site with attenuation systems provided. Levels design ensures falls away from buildings;</li> <li>- Flood risk of groundwater from the underlying geology and groundwater levels is low. Mitigation measures include proposed basement level on west building to provide waterproofing in accordance with BS EN 8102 Low Sewers Thames Water drainage network new foul and surface water networks to be provided on site sized for the proposed development for its lifetime.</li> </ul> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Redevelopment of the site should provide new homes (C3).
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
			✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The site allocation already benefits from excellent public transport connections, supporting the intensification of development. The requirement to improve pedestrian movement and permeability through the site will further promote active transport modes.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could be provide community and leisure uses which could include cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion
			✓✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP02 – 62-67 Park Street				
IIA Objectives	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓	✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	By improving the walking environment on Park Street and New Globe Walk, the incidence of crime should be reduced and the fear of crime as people benefit from a more legible streetscape with natural surveillance.
			✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Increases in active frontages will encourage neighbourhood surveillance, which will improve feelings of safety in the area.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity within the area will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
			✓✓	Successful delivery of the Low Line walking route will ensure that the public space underneath railway arches which are traditionally attributed to crime, will be accessible and permeable therefore reducing crime in the area
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	New walking routes, such as the site’s relationship with the Low Line, will encourage community interaction, equality and ease of accessibility throughout the area.
			✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunity for more families and individuals to reside in a prime location in the borough, near to employment opportunities.
			✓✓	Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	New community facilities will improve opportunities for social interaction and social cohesion in the area.
IIAO 6	To reduce contributions to climate change	-	-	The substantial demolition and construction may generate greenhouse gases, however NSP policies seek to minimise carbon dioxide emissions from development in order of with energy hierarchy and in compliance with sustainability standards.
IIAO 7	To improve the air quality	✓	✓	A more walkable streetscape will improve and encourage active travel.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	ü	✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. Redevelopment must be sensitive to the Thames Policy Area, where building heights should be lower in close the proximity to the River Thames.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is within close proximity to The Hope Theatre and Bear Baiting Arena and relates to internationally important theatre sites The Rose and The Globe. The site is within the setting of Grade II listed Union Works and undesignated heritage assets including Tate Modern, City of London Corporation Housing and building of townscape merit 6-8 Emerson Street. The site is within the setting of Bear Gardens Conservation Area. This will need to be considering when coming forward with redevelopment proposal.
IIAO 13	To protect and enhance open spaces, green corridors and	✓	✓	The site is in proximity to the Tate Community Garden (Other Open Space) and Tate Modern (Borough Open Land). These will be preserved in any future redevelopment.

	biodiversity			
I1AO 14	To reduce vulnerability to flooding			<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 3) will have a “more vulnerable’ use (mixed use including employment, town centre and residential uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- Any redevelopment should provide public realm enhancements, to offer spaces for meeting, and informal recreation, to allow visitors and residents to explore and enjoy the area;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- The requirement to improve pedestrian movement and permeability through the site will enhance connectivity across the area, promoting healthy lifestyles and improving access to services;</li> <li>- Successful delivery of the Low Line walking route will ensure that the public space underneath railway arches which are traditionally attributed to crime, will be accessible and permeable therefore reducing crime in the area;</li> <li>- A more walkable streetscape will improve and encourage active travel;</li> <li>- The site allocation already benefits from excellent public transport connections supporting the intensification of development. Redevelopment should support the walking environment on Park Street and New Globe Walk which will support sustainable transport.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Basement dwellings should not be accepted.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
I1AO 15	To provide everyone with the opportunity to live in a decent home			<p>Redevelopment of the site should provide new homes (C3).</p> <p>Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</p> <p>It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.</p> <p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.</p> <p>Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p> <p>By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around</p>

				infrastructure requirements housing growth should be sustained including affordable housing.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The site allocation already benefits from excellent public transport connections supporting the intensification of development. Redevelopment should support the walking environment on Park Street and New Globe Walk which will support sustainable transport.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could provide community and leisure uses, this could include health, facilities, training centres, community centres, cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP03 – 185 Park Street				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will contribute towards the local economy by providing new employment space. The existing use on site is offices – 6,042m2.  The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	Redevelopment should support the walking environment on Park Street and New Globe Walk.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	By improving the walking environment on Park Street and New Globe Walk, the incidence of crime should be reduced and the fear of crime as people benefit from a more legible streetscape with natural surveillance.
			✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity within the area will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
			✓✓	Increases in active frontages will encourage neighbourhood surveillance, which will improve feelings of safety in the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Improved town centre uses should encourage more people to shop locally within their area, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunities for more families and individuals to reside in a prime location in the borough, near to employment opportunities.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	New community facilities will improve opportunities for social interaction and social cohesion in the area. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction.
<b>IIAO 6</b>	To reduce contributions to climate change	-	-	The substantial demolition and construction may generate greenhouse gases, however NSP policies seek to minimise carbon dioxide emissions from development in order of with energy hierarchy and in compliance with sustainability standards.
<b>IIAO 7</b>	To improve the air quality	✓	✓	Redevelopment should support the walking environment on Park Street and New Globe Walk. Therefore working to support active travel and reduce poor air quality from vehicular modes of transport.
<b>IIAO 8</b>	To avoid waste and maximise,	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate

	reuse or recycle waste arising as a resource			management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
<b>IIO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. Redevelopment must be sensitive to the Thames Policy Area, where building heights should be lower in close the proximity to the River Thames.
<b>IIO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is within a few meters of The Hope Theatre and Bear Baiting Arena and relates to internationally important theatre sites The Rose and The Globe. The site is within the setting of Grade II listed Union Works and undesignated heritage assets including Tate Modern, City of London Corporation Housing and building of townscape merit 6-8 Emerson Street. The site is within the setting of Bear Gardens Conservation Area. This will need to be considering when coming forward with redevelopment proposal.
<b>IIO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	-	-	The site is not within a designated open space.
<b>IIO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 3) will have a “more vulnerable’ use (mixed use including employment, town centre and residential uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.</li> <li>- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.</li> <li>- Redevelopment should support the walking environment on Park Street and New Globe Walk;</li> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant;</li> <li>- By improving the walking environment on Park Street and New Globe Walk, the incidence of crime should be reduced and the fear of crime as people benefit from a more legible streetscape with natural surveillance;</li> <li>- Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours;</li> <li>- Improved town centre uses should encourage more people to shop locally within their area, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- New community facilities will improve opportunities for social interaction and social cohesion in the area;</li> <li>- The site allocation already benefits from excellent public transport connections supporting the intensification of development. Redevelopment should support the walking environment on Park Street and New Globe Walk which will support sustainable transport;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough. If socially rented, this will provide opportunity for more families and individuals to reside in a prime location in the borough, near to employment opportunities;</li> <li>- New community facilities will improve opportunities for social interaction and social cohesion in the area. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development</p>

				<p>proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.</p> <p>A flood risk assessment was submitted with the granted permission on site and the associated breach analysis demonstrates that the site would not flood in the event of a breach of the Thames tidal defences. The Environment Agency was consulted on the application and they have advised that they would have no objection to the proposal subject to the submission of an addendum to ensure that the 'more vulnerable' use in the basement has been fully considered and mitigated. The applicant submitted the required information to the Environment Agency who confirmed that they have no objection to the proposal subject to conditions.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Redevelopment of the site should provide new homes (C3).
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
			✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The site allocation already benefits from excellent public transport connections supporting the intensification of development. Redevelopment should support the walking environment on Park Street and New Globe Walk which will support sustainable transport.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could provide community and leisure, this could include health, facilities, training centres, community centres, cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP04 – London Fire and Emergency Planning Authority				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	<p>An increase in homes, schools and community facilities will provide essential social infrastructure that indirectly provide the skills to equip individuals to tackle poverty and encourage wealth creation. The site has the potential to accommodate residential uses, likely to be towards the southern section of the site, particularly along Southwark Bridge Road and Sawyer Street.</p> <p>The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.</p>
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
			✓✓	Redevelopment on site should provide a new secondary school and sixth form; Redevelopment of the site may provide community space. A new school will ease the load on current schools in the surrounding area, and provide improved education to the local population.
IIAO 3	To improve the health of the	✓✓	✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.

	population		✓✓	New schools and community facilities will improve sense of community and reduce the risk of social isolation. Community facilities promote healthier lifestyles and enable people to meet their needs for health, leisure, training, youth, voluntary and general community provision. It is important that we take the opportunity for education facilities to provide facilities for sports, leisure, culture and for events so that we can maximise opportunities for active, healthy lifestyles.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Transforming a previous vacant site with last use as the Southwark Fire Station complex (sui generis) 11,664m2 into a new school and sixth form and new homes will ensure that more people are brought into the area therefore creating and maintaining a safe environment where people live and work in.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity within the area will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Transforming a vacant site into a mixed use development that provides essential social infrastructure for surrounding area will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction. Community facilities and schools provide a diverse range of local needs.
			✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunities for more families and individuals to reside in a prime location in the borough, near to employment opportunities.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion.
			✓✓	Community facilities should be made available for use by all members of the community. This will encourage community interaction and active, healthy lifestyles and social cohesion.
			✓✓	New community facilities will improve sense of community and reduce the risk of social isolation. Use of open space will promote community cohesion and equality to local population.
			✓✓	Education facilities should be made available for use by all members of the community when they are not needed by the education establishment, for example, out of school hours. This will encourage community interaction and active, healthy lifestyles.
IIAO 6	To reduce contributions to climate change	-	-	The substantial demolition and construction may generate greenhouse gases, however NSP policies seek to minimise carbon dioxide emissions from development in order of with energy hierarchy and in compliance with sustainability standards.
IIAO 7	To improve the air quality	✓	✓	The enhancement of walking and cycling routes can help to provide improved air quality through more active modes of transport by reducing greenhouse gas emissions
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	The northern part of the site lies within the Union Street Conservation area and is within the setting of the Liberty of the Mint Conservation Area. All future development must sustain and enhance the historic character of the site and immediate context, and consider how these designations will create an interesting and attractive environment.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site includes the Grade II listed London Fire Brigade building and Winchester House, which must be retained and its setting enhanced. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity to Mint Street Park (Site of Importance for Nature Conservation), Grotto Open Space (Borough Open Land) and Grotto Podiums (Other Open Space). Any redevelopment must retain mature boundary trees.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (in SFRA level 2 - Analysis 2) will have a "more vulnerable" use (mixed use including residential, education and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows: <ul style="list-style-type: none"> <li>- An increase in homes, schools and community facilities will provide essential social infrastructure that indirectly provide the skills to equip individuals to tackle poverty and encourage wealth creation;</li> </ul>

- The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty;
- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development;
- A new school will ease the load on current schools in the surrounding area, and provide improved education to the local population;
- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant;
- New schools and community facilities will improve sense of community and reduce the risk of social isolation. Community facilities promote healthier lifestyles and enable people to meet their needs for health, leisure, training, youth, voluntary and general community provision. It is important that we take the opportunity for education facilities to provide facilities for sports, leisure, culture and for events so that we can maximise opportunities for active, healthy lifestyles;
- Transforming a previous vacant site with last use as the Southwark Fire Station complex (sui generis) 11,664m2 into a new school and sixth form and new homes will ensure that more people are brought into the area therefore creating and maintaining a safe environment where people live and work in;
- Transforming a vacant site into a mixed use development that provides essential social infrastructure for surrounding area will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction. Community facilities and schools provide a diverse range of local needs;
- Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunity for more families and individuals to reside in a prime location in the borough, near to employment opportunities;
- Community facilities should be made available for use by all members of the community. This will encourage community interaction and active, healthy lifestyles and social cohesion;
- New community facilities will improve sense of community and reduce the risk of social isolation. Use of open space will promote community cohesion and equality to local population;
- Education facilities should be made available for use by all members of the community when they are not needed by the education establishment, for example, out of school hours. This will encourage community interaction and active, healthy lifestyles;
- Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together;
- It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people;
- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
- By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing;
- Any redevelopment must provide links to Cycle Super Highway 7 on Southwark Bridge Road.

To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Basement dwellings should not be accepted. Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.

A flood risk assessment was submitted with the granted permission on site the assessment concludes that the site would not flood in the event of a breach of the Thames tidal defences, the assessment also notes that a flood evacuation plan will be prepared prior to occupation of the development and construction measures such as rainwater harvesting and permeable paving will be incorporated into the construction to manage surface water drainage sustainably. The Environment Agency were consulted on the application and raised no objection.

				As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
			✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Any redevelopment must provide links to Cycle Super Highway 7 on Southwark Bridge Road.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	New schools will support the delivery of critical social infrastructure in the area.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP05 – 1 Southwark Bridge Road and Red Lion Court				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓✓	✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	Redevelopment should provide a new link from Park Street to the Thames Path and improvements to the Thames Path. Redevelopment should also provide links to Cycle Super Highway 7 on Southwark Bridge Road. Increased forms active travel will encourage movement and health in the local population.
			✓✓	New Open spaces and Green links further encourage leisure and community activities that support health of the local population.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Transforming a previous vacant site with last use as the Southwark Fire Station complex (sui generis) 11,664m2 into a new school and sixth form and new homes will ensure that more people are brought into the area therefore creating and maintaining a safe environment where people live and work in.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity within the area will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Transforming an office site into a mixed use development with new homes, green links, open spaces and public realm and active frontages with ground floor town centre use, provides essential social infrastructure for surrounding area, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.

			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	New, shared open spaces and Green links encourage leisure and community activities that support health of the local population.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓	A more walkable streetscape will improve and encourage active travel. New Open space further reduces the intensification of the land use and should improve the air quality, supporting biodiversity
			✓✓	An increase in the provision of open space will help absorb negative CO2 emissions and reduce the amount of air quality emitted.
<b>IIAO 7</b>	To improve the air quality	✓	✓	The enhancement of walking and cycling routes can help to provide improved air quality through more active modes of transport by reducing greenhouse gas emissions.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. The design of the development should respond to its prominent, yet sensitive setting as an arrival point into Southwark from Southwark Bridge. Redevelopment must be sensitive to the Thames Policy Area, where building heights should be lower in close the proximity to the River Thames.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is located within the setting of the Grade II listed Southwark Bridge, Anchor Terrace (1 Southwark Bridge Road), Anchor Public House (1 Bankside) and Union Works. The site is located in the setting of the Bear Gardens and Thrale Street Conservation Areas. The site is within a few metres of the internationally important Globe Theatre and Rose Theatre scheduled monuments. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	There are no nearby designated open spaces but redevelopment of the site includes open space of at least 15% of the site area and new north-south green link. This will directly protect and enhance open space, green corridors and biodiversity in the area.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 3) will have a "more vulnerable" use (mixed use including employment, town centre and residential uses and open space) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- An increase in homes, schools and community facilities will provide essential social infrastructure that indirectly provide the skills to equip individuals to tackle poverty and encourage wealth creation;</li> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant;</li> <li>- New Open spaces and Green links further encourage leisure and community activities that support health of the local population;</li> <li>- Transforming a previous vacant site with last use as the Southwark Fire Station complex (sui generis) 11,664m2 into a new school and sixth form and new homes will ensure that more people are brought into the area therefore creating and maintaining a safe environment where people live and work in;</li> <li>- Transforming an office site into a mixed use development with new homes, green links, open spaces and public realm and active frontages with ground floor town centre use, provides essential social infrastructure for surrounding area, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- New, shared open spaces and Green links encourage leisure and community activities that support health of the local population;</li> <li>- A more walkable streetscape will improve and encourage active travel. New Open space further reduces the intensification of the land use and should improve the air quality, supporting biodiversity;</li> <li>- An increase in the provision of open space will help absorb negative CO2 emissions and reduce the amount of air quality emitted;</li> </ul>

				<ul style="list-style-type: none"> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- There are no nearby designated open spaces but redevelopment of the site includes open space of at least 15% of the site area and new north-south green link. This will directly protect and enhance open space, green corridors and biodiversity in the area;</li> <li>- Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together;</li> <li>- It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.</li> <li>- A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough;</li> <li>- By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing;</li> <li>- Redevelopment should provide a new link from Park Street to the Thames Path and improvements to the Thames Path. Redevelopment should also provide links to Cycle Super Highway 7 on Southwark Bridge Road;</li> <li>- Bankside and the Borough are deficient in parks and other green space, which the new space will address; and it will mitigate the pressure from development on existing open space; and the site is large enough to accommodate a meaningful open space at an achievable level; and it will improve enjoyment of the Thames Path; and it will mark an arrival point into Southwark;</li> <li>- New open spaces provide critical community infrastructure to the area.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
			✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment should provide a new link from Park Street to the Thames Path and improvements to the Thames Path. Redevelopment should also provide links to Cycle Super Highway 7 on Southwark Bridge Road.
		✓✓	✓✓	Bankside and the Borough are deficient in parks and other green space, which the new space will address; and it will mitigate the pressure from development on existing open space; and the site is large enough to accommodate a meaningful open space at an achievable level; and it will improve enjoyment of the Thames Path; and it will mark an arrival point into Southwark.
<b>IIAO 17</b>	To provide the necessary	✓✓	✓✓	New open spaces provide critical community infrastructure to the area.

	infrastructure to support existing and future development		✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.
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NSP06 – Landmark Court				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓✓	✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	The area is currently well-served by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Transforming a previous car park site into employment and mixed ground floor retail space will ensure that more activity is brought to the surrounding streetscape, therefore creating and maintaining a safe environment where people live and work in.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	The current car park will provide employment floorspace and ground floor town centre use class, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	-	-	The substantial demolition and construction may generate greenhouse gases, however NSP policies seek to minimise carbon dioxide emissions from development in order of with energy hierarchy and in compliance with sustainability standards.
IIAO 7	To improve the air quality	✓	✓	The enhancement of walking and cycling routes can help to provide improved air quality through more active modes of transport by reducing greenhouse gas emissions
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	The site will provide employment floorspace and active frontages on Southwark Street to differentiate from its current Car Park (sui generis) use at existing. This will improve the townscape use from the existing condition.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is within the setting of Grade II listed buildings on Southwark Street, Maidstone Buildings and Redcross Way. A notable example is Cromwell Building 5-24. The site is within the setting of sensitive undesignated heritage assets, including Crossbones Cemetery. The site is within the Borough High Street Conservation Area. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity to Crossbones Graveyard (Other Open Space). This will not be impacted as part of the future development.

IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 –Analysis 3) will have a “more vulnerable’ use (mixed use including employment, town centre and residential uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation;</li> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant;</li> <li>- The area is currently well-serviced by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents;</li> <li>- Transforming a previous car park site into employment and mixed ground floor retail space will ensure that more activity is brought to the surrounding streetscape, therefore creating and maintaining a safe environment where people live and work in;</li> <li>- The site will provide employment floorspace and active frontages on Southwark Street to differentiate from its current Car Park (sui generis) use at existing. This will improve the townscape use from the existing condition;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together;</li> <li>- It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.</li> <li>- The site allocation already benefits from excellent public transport connections, supporting the intensification of development. The requirement to improve pedestrian movement and permeability through the site will further promote active transport modes.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>A flood risk assessment was submitted with the approved permission on site. The assessment concludes that the site would not flood in the event of a breach of the Thames tidal defences, the assessment also notes that a flood evacuation plan will be prepared and the use of SUDS will be used as part of the design to manage surface water drainage sustainably, waterproofing will also be used for the basements. The Environment Agency were consulted on the application and raised no objection.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	<p>Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</p> <p>It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.</p> <p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is</p>

				encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The site allocation already benefits from excellent public transport connections, supporting the intensification of development. The requirement to improve pedestrian movement and permeability through the site will further promote active transport modes.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could accommodate community and leisure uses flexibly, which could include cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

<b>NSP07 – Land between Great Suffolk Street and Glasshill Street</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	The area is currently well-serviced by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Active frontages will enliven the proposed Low Line walking route running alongside the railway viaduct and reduce the fear and incidence of crime.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	A variety of town centre uses may be accommodated at ground floor level, and community uses would be particularly suitable benefitting new and existing residents. Active frontages will enliven the proposed Low Line walking route running alongside the railway viaduct, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
<b>IIAO 6</b>	To reduce contributions to climate change	-	-	The substantial demolition and construction may generate greenhouse gases, however NSP policies seek to minimise carbon dioxide emissions from development in order of with energy hierarchy and in compliance with sustainability standards.
<b>IIAO 7</b>	To improve the air quality	✓	✓	Active frontages will enliven the proposed Low Line walking route running alongside the railway viaduct. The Low Line enhancement will support increased walking and cycling routes can help to provide improved air quality through more active modes of transport by reducing greenhouse gas emissions
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	The site will provide employment floorspace and community uses additional to the existing quantum of 15,185m <sup>2</sup> offices. This could improve the townscape use from the existing condition.

<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is in the setting of the Grade II listed Drapers' Almshouses (1820). In accordance with Historic England's 'Greater London Archaeological Priority Area Guidelines' although outside of an Archaeological Priority Area, the site is over 0.5ha and should be acknowledged as a tier 4 designation within the APA tier system. As a result of this the site should be assessed for archaeological significance. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity to Grotto Open Space (Borough Open Land) and Grotto Podiums (Other Open Space). This will not be impacted as part of the future development.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 22) will have a "more vulnerable" use (mixed use including employment, town centre, residential uses and open space) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.</li> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant</li> <li>- Encouraging delivery of the Low Line walking route creates improved accessibility and the quality of experience for walking. Improved walking networks encourage active travel and exercise, which is beneficial for health. Bringing more destinations closer to residents through strategic walking routes and improved accessibility, with improved pavements, crossings and public spaces encourage people to walk more. Measures to encourage walking can also help tackle social isolation and routes should accommodate parents and older or disabled people.</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health;</li> <li>- New walking routes, such as the site's relationship with the Low Line, will encourage community interaction, equality and ease of accessibility throughout the area;</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the SFRA report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Basement dwellings will not be permitted in this location.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent	✓✓	✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.

	home		✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The site allocation already benefits from excellent public transport connections, supporting the intensification of development. The requirement to improve pedestrian movement and permeability through the site will further promote active transport modes.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could accommodate community and leisure uses flexibly, which could include cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

<b>NSP08 – Swan Street Cluster Site A</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	Under NSP policies significant levels of construction will provide training in construction and in the final development.
			✓	University facilities are currently on the site and any redevelopment would be required to provide at least the amount of education floorspace currently on the site which will increase the skills of the population.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓	More job opportunities generated by retail, community and leisure uses which will help reduce poverty as an underlying determinant.
			✓✓	The area is currently well-serviced by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.
			✓✓	By providing a new east-west pedestrian and/or cycle link between Borough High Street and Swan Street there will be improved opportunities for cycling and walking to surrounding locations, which should encourage and improve physical health of local residents.
			✓✓	New education and community facilities will improve sense of community and reduce the risk of social isolation. Community facilities promote healthier lifestyles and enable people to meet their needs for health, leisure, training, youth, voluntary and general community provision. It is important that we take the opportunity for education facilities to provide facilities for sports, leisure, culture and for events so that we can maximise opportunities for active, healthy lifestyles.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	An improved east-west walking route will improve Swan Street and Sylvester Street as a less trafficked alternative to Borough High Street for cyclists and pedestrians. This will support a reduction in crime and fear of crime in these areas.
			✓✓	Development must support the east / west cycle link on Trinity Street and provide a new pedestrian and/or cycle link between Borough High Street and Swan Street via Avon Place. An activated corridor will reduce instances and fear of crime and improve connectivity between areas.
			✓✓	Town centre uses and improved ground floor active frontages on Borough High Street at all times of day. This would improve the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	A variety of town centre uses may be accommodated at ground floor level, and community uses would be particularly suitable benefitting new and existing residents, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	Education facilities should be made available for use by all members of the community when they are not needed by the education establishment,

				for example, out of school hours. This will encourage community interaction and active, healthy lifestyles.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	Redevelopment must improve Swan Street as a less trafficked alternative to Borough High Street for cyclists and pedestrians. Development must support the east / west cycle link on Trinity Street and provide a new pedestrian and/or cycle link between Borough High Street and Swan Street via Avon Place. This will support a reduction of contributions to climate change.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	A new east-west pedestrian and/or cycle link between Borough High Street and Swan Street will support increased walking and cycling routes can help to provide improved air quality through more active modes of transport by reducing greenhouse gas emissions.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. Redevelopment must enhance the setting of the Liberty of the Mint, Borough High Street and Trinity Church Square Conservation Areas.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Redevelopment must enhance the setting of the Grade II* listed St George the Martyr Church, Grade II listed buildings to the south east and the nearby Trinity Church Square. Redevelopment must enhance the setting of the Liberty of the Mint, Borough High Street and Trinity Church Square Conservation Areas.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The northern part of the cluster is in proximity to St George's Churchyard and Gardens (Borough Open Land).). This will not be impacted as part of the future development. Existing mature landscaping provides significant amenity and screening value to the Conservation Areas.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 4) will have a "more vulnerable" use (mixed use including employment, town centre, education, health and residential uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The site will therefore provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.</li> <li>- Under NSP policies significant levels of construction will provide training in construction and in the final development.</li> <li>- More job opportunities generated by town centre uses which will help reduce poverty as an underlying determinant.</li> <li>- The area is currently well-served by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.</li> <li>- By providing a new east-west pedestrian and/or cycle link between Borough High Street and Swan Street there will be improved opportunities for cycling and walking to surrounding locations, which should encourage and improve physical health of local residents.</li> <li>- New education and community facilities will improve sense of community and reduce the risk of social isolation. Community facilities promote healthier lifestyles and enable people to meet their needs for health, leisure, training, youth, voluntary and general community provision. It is important that we take the opportunity for education facilities to provide facilities for sports, leisure, culture and for events so that we can maximise opportunities for active, healthy lifestyles.</li> <li>- Development must support the east / west cycle link on Trinity Street and provide a new pedestrian and/or cycle link between Borough High Street and Swan Street via Avon Place. An activated corridor will reduce instances and fear of crime and improve connectivity between areas.</li> <li>- Town centre uses and improved ground floor active frontages on Borough High Street at all times of day. This would improve the walking routes will encourage a high level of footfall to the area, which will positively bring "eyes on the streets" to improve the perception of safety and discourage offensive and criminal behaviours.</li> <li>- Education facilities should be made available for use by all members of the community when they are not needed by the education establishment, for example, out of school hours. This will encourage community interaction and active, healthy lifestyles.</li> <li>- A new east-west pedestrian and/or cycle link between Borough High Street and Swan Street will support increased walking and cycling</li> </ul>

				<p>routes can help to provide improved air quality through more active modes of transport by reducing greenhouse gas emissions.</p> <ul style="list-style-type: none"> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
			✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment must improve Swan Street as a less trafficked alternative through High Street for cyclists and pedestrians. Development must support the east / west cycle link on Trinity Street and provide a new pedestrian and/or cycle link between Borough High Street and Swan Street via Avon Place.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	A new east-west pedestrian and/or cycle link between Borough High Street and Swan Street will support increased walking and cycling routes and is critical transport infrastructure.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP08 – Swan Street Cluster Site B				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job

				opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
			✓	Redevelopment of the site may provide community spaces which may provide the opportunity for educational facilities for people to increase their skills.
IIAO 3	To improve the health of the population	✓✓	✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	The area is currently well-served by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.
			✓✓	Community facilities and a possible health centre will improve sense of community and reduce the risk of social isolation. Community facilities promote healthier lifestyles and enable people to meet their needs for health, leisure, training, youth, voluntary and general community provision.
			✓✓	An activated corridor will reduce instances and fear of crime and improve connectivity between areas.
			✓✓	Town centre uses and improved ground floor active frontages on Great Dover Street and Swan Street at all times of day. This would improve the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	A variety of town centre uses may be accommodated at ground floor level, and community uses would be particularly suitable benefitting new and existing residents, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	The provision of any education facilities should be made available for use by all members of the community when they are not needed by the education establishment, for example, out of school hours. This will encourage community interaction and active, healthy lifestyles.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Redevelopment must improve Swan Street and Sylvester Street as a less trafficked alternative to Borough High Street for cyclists and pedestrians. Development must support the east / west cycle link on Trinity Street and provide a new pedestrian and/or cycle link between Borough High Street and Swan Street via Avon Place. This will support a reduction of contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	The enhancement of walking and cycling routes can help to provide improved air quality through more active modes of transport by reducing greenhouse gas emissions
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. Redevelopment must enhance the setting of the Liberty of the Mint, Borough High Street and Trinity Church Square Conservation Areas.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Redevelopment must enhance the setting of the Grade II* listed St George the Martyr Church, Grade II listed buildings to the south east and the nearby Trinity Church Square. Redevelopment must enhance the setting of the Liberty of the Mint, Borough High Street and Trinity Church Square Conservation Areas.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The northern part of the cluster is in proximity to St George’s Churchyard and Gardens (Borough Open Land)). This will not be impacted as part of the future development. Existing mature landscaping provides significant amenity and screening value to the Conservation Areas.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (in SFRA level 2 - Analysis 4) will have a “more vulnerable’ use (mixed use including employment, town centre, education, health and residential uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:

				<ul style="list-style-type: none"> <li>- The site will therefore provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.</li> <li>- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.</li> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.</li> <li>- The area is currently well-served by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.</li> <li>- By providing a new east-west pedestrian and/or cycle link between Borough High Street and Swan Street there will be improved opportunities for cycling and walking to surrounding locations, which should encourage and improve physical health of local residents.</li> <li>- Education and community facilities will improve sense of community and reduce the risk of social isolation. Community facilities promote healthier lifestyles and enable people to meet their needs for health, leisure, training, youth, voluntary and general community provision. It is important that we take the opportunity for education facilities to provide facilities for sports, leisure, culture and for events so that we can maximise opportunities for active, healthy lifestyles.</li> <li>- Development must support the east / west cycle link on Trinity Street and provide a new pedestrian and/or cycle link between Borough High Street and Swan Street via Avon Place. An activated corridor will reduce instances and fear of crime and improve connectivity between areas.</li> <li>- Town centre uses and improved ground floor active frontages on Borough High Street at all times of day. This would improve the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.</li> <li>- Education facilities should be made available for use by all members of the community when they are not needed by the education establishment, for example, out of school hours. This will encourage community interaction and active, healthy lifestyles.</li> <li>- A new east-west pedestrian and/or cycle link between Borough High Street and Swan Street will support increased walking and cycling routes can help to provide improved air quality through more active modes of transport by reducing greenhouse gas emissions.</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
			✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.

			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment must improve Swan Street and Sylvester Street as a less trafficked alternative through High Street for cyclists and pedestrians. Development must support the east / west cycle link on Trinity Street and provide a new pedestrian and/or cycle link between Borough High Street and Swan Street via Avon Place.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	A new east-west pedestrian and/or cycle link between Borough High Street and Swan Street will support increased walking and cycling routes and is critical transport infrastructure.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

<b>NSP08 – Swan Street Cluster Site C</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
			✓	Redevelopment of the site may provide community spaces which may provide the opportunity for educational facilities for people to increase their skills
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	The area is currently well-serviced by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.
			✓✓	Community facilities and a possible health centre will improve sense of community and reduce the risk of social isolation. Community facilities promote healthier lifestyles and enable people to meet their needs for health, leisure, training, youth, voluntary and general community provision. It is important that we take the opportunity for education facilities to provide facilities for sports, leisure, culture and for events so that we can maximise opportunities for active, healthy lifestyles.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	An improved east-west walking route will improve Swan Street and Sylvester Street as a less trafficked alternative to Borough High Street for cyclists and pedestrians. This will support a reduction in crime and fear of crime in these areas.
			✓✓	Town centre uses and improved ground floor active frontages on Great Dover Street and Swan Street at all times of day. This would improve the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	A variety of town centre uses may be accommodated at ground floor level, and community uses would be particularly suitable benefitting new and existing residents, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction.

			✓✓	The provision of any education facilities should be made available for use by all members of the community when they are not needed by the education establishment, for example, out of school hours. This will encourage community interaction and active, healthy lifestyles.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	Redevelopment must improve Swan Street and Sylvester Street as a less trafficked alternative to Borough High Street for cyclists and pedestrians. Development must support the east / west cycle link on Trinity Street and provide a new pedestrian and/or cycle link between Borough High Street and Swan Street via Avon Place. This will support a reduction of contributions to climate change.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	A new east-west pedestrian and/or cycle link between Borough High Street and Swan Street will support increased walking and cycling routes can help to provide improved air quality through more active modes of transport by reducing greenhouse gas emissions.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. Redevelopment must enhance the setting of the Liberty of the Mint, Borough High Street and Trinity Church Square Conservation Areas.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Redevelopment must enhance the setting of the Grade II* listed St George the Martyr Church, Grade II listed buildings to the south east and the nearby Trinity Church Square. Redevelopment must enhance the setting of the Liberty of the Mint, Borough High Street and Trinity Church Square Conservation Areas.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The northern part of the cluster is in proximity to St George's Churchyard and Gardens (Borough Open Land).). This will not be impacted as part of the future development. Existing mature landscaping provides significant amenity and screening value to the Conservation Areas.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 4) will have a "more vulnerable" use (mixed use including employment, town centre, education, health and residential uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The site will therefore provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.</li> <li>- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.</li> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.</li> <li>- The area is currently well-served by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.</li> <li>- By providing a new east-west pedestrian and/or cycle link between Borough High Street and Swan Street there will be improved opportunities for cycling and walking to surrounding locations, which should encourage and improve physical health of local residents.</li> <li>- Education and community facilities will improve sense of community and reduce the risk of social isolation. Community facilities promote healthier lifestyles and enable people to meet their needs for health, leisure, training, youth, voluntary and general community provision. It is important that we take the opportunity for education facilities to provide facilities for sports, leisure, culture and for events so that we can maximise opportunities for active, healthy lifestyles.</li> <li>- Development must support the east / west cycle link on Trinity Street and provide a new pedestrian and/or cycle link between Borough High Street and Swan Street via Avon Place. An activated corridor will reduce instances and fear of crime and improve connectivity between areas.</li> <li>- Town centre uses and improved ground floor active frontages on Borough High Street at all times of day. This would improve the walking routes will encourage a high level of footfall to the area, which will positively bring "eyes on the streets" to improve the perception of safety and discourage offensive and criminal behaviours.</li> </ul>

				<ul style="list-style-type: none"> <li>- Education facilities should be made available for use by all members of the community when they are not needed by the education establishment, for example, out of school hours. This will encourage community interaction and active, healthy lifestyles.</li> <li>- A new east-west pedestrian and/or cycle link between Borough High Street and Swan Street will support increased walking and cycling routes can help to provide improved air quality through more active modes of transport by reducing greenhouse gas emissions.</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
			✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment must improve Swan Street and Sylvester Street as a less trafficked alternative through High Street for cyclists and pedestrians. Development must support the east / west cycle link on Trinity Street and provide a new pedestrian and/or cycle link between Borough High Street and Swan Street via Avon Place.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	A new east-west pedestrian and/or cycle link between Borough High Street and Swan Street will support increased walking and cycling routes and is critical transport infrastructure.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP09 – 19, 21 and 23 Harper Road, 325 Borough High Street, 1-5 and 7-11 Newington Causeway**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	The area is currently well-serviced by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Active frontages will enliven the proposed Low Line walking route running alongside the railway viaduct and reduce the fear and incidence of crime.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	A variety of town centre uses may be accommodated at ground floor level, and community uses would be particularly suitable benefitting new and existing residents. Active frontages will enliven the proposed Low Line walking route running alongside the railway viaduct, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
<b>IIAO 6</b>	To reduce contributions to climate change	-	-	The substantial demolition and construction may generate greenhouse gases, however NSP policies seek to minimise carbon dioxide emissions from development in order of with energy hierarchy and in compliance with sustainability standards.
<b>IIAO 7</b>	To improve the air quality	✓	✓	Active frontages will enliven the proposed Low Line walking route running alongside the railway viaduct. The Low Line enhancement will support increased walking and cycling routes can help to provide improved air quality through more active modes of transport by reducing greenhouse gas emissions
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	NSP policies require development to be reflective of the existing townscape. Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is within the setting of the Grade II listed buildings Inner London Court, Trinity Church Square, Trinity Street, Swan Street and Sessions House (Newington Causeway). The site is within the setting of the Trinity Church Square Conservation Area. Development that comes forward must work to protect and enhance this setting.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity to Newington Gardens (Borough Open Land). This will not be impacted as part of the future development.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (in SFRA level 2 - Analysis 4) will have a "more vulnerable" use (mixed use including employment, town centre and residential uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows: <ul style="list-style-type: none"> <li>- The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation;</li> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant;</li> <li>- The area is currently well-serviced by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.</li> <li>- Active frontages will enliven the proposed Low Line walking route running alongside the railway viaduct and reduce the fear and incidence</li> </ul>

				<p>of crime.</p> <ul style="list-style-type: none"> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- Redevelopment should contribute towards enhanced green walking routes to Elephant and Castle and Borough, as well as link to the proposed cycle route improvements to Swan Street.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>A flood risk assessment was submitted with the granted permission on site. The Environment Agency have been consulted and have not objected to the proposal and as such no flood risk impacts would be expected as a result of the proposal.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
			✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment should contribute towards enhanced green walking routes to Elephant and Castle and Borough, as well as link to the proposed cycle route improvements to Swan Street.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could accommodate community and leisure uses flexibly, which could include cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.



**Integrated impact assessment for**

**AV03 Bermondsey Area vision**

Including

NSP10 – Biscuit Factory and Campus

NSP11 – Tower Workshops

NSP12 – Chambers Wharf

	AV03				NSP10	NSP11	NSP12
	Area wide	S	M	L			
IIAO 1	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 2	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 3	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 4	✓	-	✓	✓	✓✓	✓✓	✓✓
IIAO 5	✓	-	✓	✓✓	✓✓	✓✓	✓✓
IIAO 6	-	-	-	✓	✓✓	-	✓✓
IIAO 7	-	-	-	✓	✓✓	✓	✓✓
IIAO 8	-	-	-	-	-	-	-
IIAO 9	-	-	-	-	-	-	-
IIAO 10	-	-	-	-	-	-	-
IIAO 11	✓	✓	✓	✓	✓	✓	✓
IIAO 12	✓	-	✓	✓	✓	✓	✓
IIAO 13	✓	-	✓	✓	✓✓	✓	✓✓
IIAO 14	✓	-	✓	✓	✓	✓	✓
IIAO 15	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 16	✓	✓	✓	✓	✓✓	✓✓	✓✓
IIAO 17	✓✓	✓	✓✓	✓✓	✓✓	✓	✓✓
Avg.	50%	24%	50%	59%	74%	59%	74%

**Integrated Impact Assessment for:**

**AV03 Bermondsey Area Vision and site allocations NSP10 – NSP12 as follows:**

- NSP10: Biscuit Factory and Campus
- NSP11: Tower Workshops
- NSP12: Chambers Wharf

AV03 Bermondsey Area Vision						
IIA Objective	Description	Area-wide	Timescale			Commentary
			Short Term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	On employment sites the re-provision of at least the equivalent level of employment floorspace or 50% of the sites total development capacity is safeguarded, whichever is greater. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. The area vision and site allocations for Bermondsey the most part prioritise the delivery small business space for creative and cultural employment uses to create a diverse employment base and a range of job opportunities. This approach will help foster a thriving creative industries hub, providing an employment cluster accessible to local people and safeguarding the retention of existing local businesses. The transition away from light industrial uses in some cases (NSP10 and NSP12) could result in the loss of this type of job opportunity, although the anticipated uplift of employment space let as smaller units will attract a variety of different employers and opportunities. Town centre uses and active frontages proposed across many of the sites within the vision area will create a vibrant urban area.
IIAO 2	To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	Provision of a replacement secondary school alongside workspace for small and medium size enterprises at NSP10 will provide a vital skills base to educate future generations and substantially increase the proportion of skilled workers in the area through apprenticeships and other training programmes. Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.  Additional text has been included to clarify the aim for the delivery of new facilities for the Compass Secondary School. This provision will improve the education of local residents and provide additional amenities and support to upskill the local population, and create opportunities for social interaction.
IIAO 3	To improve the health of the population	✓✓	✓	✓✓	✓✓	Enhancement of the low-line walking route, green links and planned cycle networks will promote active lifestyles and help reduce the causes and exposure to poor air quality. Higher density development envisaged will free up space and routes between building plots to improve legibility and promote social interaction. More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Improved permeability and activation of frontages, particularly along the low-line route, will open up spaces to promote social interaction and the feeling of public safety. High quality and inclusive public realm enhancement, including proposed courtyards, will be accessible to all groups in

						order promote sense of community.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	-	✓	✓✓	<p>High quality and inclusive public realm enhancements will be accessible to all groups. Low-line, green links and planned cycle ways will create a more legible urban environment to avoid physical barriers and issues of severance. The potential provision of community spaces and facilities as part of town centre uses prescribed in at NSP10 and NSP12 will provide the opportunity to bring together and provide services for a variety of groups for the benefit of the local community to promote social cohesion. It will be particularly important to integrate the south / south-east areas of Bermondsey as they fall within the most deprived areas in Southwark. It is therefore essential that these areas will reap the benefits of redevelopment to reduce the inequality gap.</p> <p>A point of clarification to the Area Vision has been made to better reflect the approach to heritage and local character preservation which undermines the promotion of social inclusion and community cohesion.</p>
IIAO 6	To reduce contributions to climate change	-	-	-	✓	<p>Low-line, green links and planned cycle ways will promote active transport modes, improving air quality and mitigating greenhouse gas emissions. Enhanced green linkages and proposed additional open space will encourage urban greening to adapt to the effects of climate change and reduce the urban heat island effect. Despite excellent public transport links, the sub-area experiences some of the heaviest congestion in the borough, notably along Tower Bridge Road – CO2 emissions suffer as a result and these could be exacerbated by accelerated levels of construction and demolition. NSP policies seek to minimise carbon dioxide emissions from development.</p>
IIAO 7	To improve the air quality	-	-	-	✓	<p>Low-line, green links and planned cycle ways will promote active transport modes, helping to address the causes of poor air quality. Air quality in the area suffers as a result of high levels of congestion, notably along Tower Bridge Road, this could be exacerbated by accelerated levels of construction and demolition. However, transition away from industrial uses (NSP10 and NSP12) might improve air quality as well limiting the number of HGV's within the sub-area which should have a positive effect on congestion. NSP policies requires development to meet air quality neutral standards and improve air quality.</p>
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	<p>Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.</p>
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	<p>Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.</p>
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	<p>All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.</p>
IIAO 11	To protect and enhance quality of landscape	✓	✓	✓	✓	<p>Development will be respectful to the designations of conservation areas and strategic viewing corridors where they apply. All existing open space is due to be retained whilst new open space</p>

	and townscape					<p>proposed will encourage urban greening and landscape enhancements. Enhanced high-quality public realm where redevelopment occurs should provide for a much-improved townscape.</p> <p>Additional wording has been included to highlight the unique quality of landscape and townscape in Bermondsey. The text highlights what is special about the local character to ensure that future development will protect and enhance the landscape and townscape.</p>
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	ü	-	✓	✓	All existing open space is due to be retained whilst proposed open space and enhanced green links will encourage urban greening and landscape enhancements. They provide the opportunity to create new habitats which will enhance biodiversity and reinforce the aspirations of the ecology restoration zone (River Thames Restoration Zone).
IIAO 14	To reduce vulnerability to flooding	✓	-	✓	✓	<p>The sites within Bermondsey are located in flood risk zones 3a benefitting from defences. This means that where more vulnerable sites are proposed the exception test will be required to assess the benefits of the development and the flood risk mitigation measures proposed</p> <p>Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. The west of the sub-area falls within a Critical Drainage Area and therefore the impact of substantial development falling within this area would need to be closely investigated to ensure they will not significantly increase the risk of flooding elsewhere. NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	<p>The area vision and site allocations should deliver a significant number of new homes across the area. If these are delivered to policy requirements they will offer a range of different units and tenures which will provide for a range of different needs and create inclusive residential schemes accessible to all groups.</p> <p>Additional text has been included to reflect the number of proposed social rented homes on the Biscuit Factory Site. The delivery of these will enable more local residents to have the opportunity to live in a decent home.</p>
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	<p>The vision area already benefits from excellent public transport connections, supporting the intensification of development. Low-line, green links and planned cycle ways will further promote active transport modes.</p> <p>Additional text has been added to the Area Vision to reflect the proposed new pedestrian routes through railway arches which will enable safer walking routes and encourage a healthier active lifestyle.</p>
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	Provision of a replacement secondary school alongside workspace for small and medium size enterprises will provide a vital skills base to educate future generations and substantially increase the proportion of skilled workers in the area through apprenticeships and other training programmes. The potential provision of community space at NSP10 will bring together a variety of groups for the benefit of the local community to promote social cohesion. It will be particularly important to ensure the south / south-east areas of Bermondsey are supported by the necessary

						<p>social infrastructure to prosper and improve quality of life as they fall within the most deprived areas in Southwark. It is therefore essential that these areas will reap the benefits of redevelopment to reduce the inequality gap. Green links and the planned cycle networks will enhance connectivity across the sub-area.</p>
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NSP10 – Biscuit Factory and Campus				
IIA Objective	Description	Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	New and replacement business floorspace will be provided, including space for small and medium enterprises. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement, In particular, space for small and medium enterprises as required will support independent businesses and lead to a diverse economy and job opportunities. The town centre uses proposed on the ground floor, including retail and community uses, will also contribute to business opportunities and local employment. All the commercial uses combined on site will have a positive effect on the local economy, and reduce poverty and create wealth as a result.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Provision of a new secondary school alongside workspace for small and medium sized enterprises will provide a vital skills base to educate future generations and substantially increase the proportion of skilled workers in the area through apprenticeships and other training programmes. Under NSP policies, training will also be provided to the local community during the construction of the development on site.
IIAO 3	To improve the health of the population	✓✓	✓✓	With the emphasis of connectivity and walkability, the site will introduce a wide range of links and walking routes, combined with the active frontages on the ground floor, to enhance the connection with Bermondsey underground station, the Blue and the Low Line walking route along the railway viaduct. The landscaping requirement will encourage walking and cycling as a form of active travel and the use of public transport, encouraging the local residents to be more active and healthier with the reduced reliance on private vehicles. In turn, the environment will be safer and cleaner, and contribute to mental well-being of the population through the pedestrian-friendly landscape design.
			✓✓	In addition, the site is in proximity to abundant green spaces including Shuttlework Park and Lucey Way, and Southwark Park, which enjoys high accessibility to the amenity space and improves mental well-being. Encouraging delivery of the Low Line walking route creates improved accessibility and the quality of experience for walking. Improved walking networks encourage active travel and exercise, which is beneficial for health. Bringing more destinations closer to residents through strategic walking routes and improved accessibility, with improved pavements, crossings and public spaces encourage people to walk more. Measures to encourage walking can also help tackle social isolation and routes should accommodate parents and older or disabled people.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	An active frontage on the ground floor and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	High quality and inclusive public realm enhancements will be accessible to all groups. Low-line and green links proposed on site will create a friendlier and safer urban environment to gather people and increase interaction among different groups. The potential provision of community spaces and facilities as part of town centre uses will provide the opportunity to bring together and provide services for a variety of groups for the benefit of the local community to promote social cohesion. It will be particularly important to integrate the south / south-east areas of Bermondsey as they fall within the most deprived areas in Southwark. It is therefore essential that these areas will reap the benefits of redevelopment to reduce the inequality gap.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	Additional text has been added to highlight the delivery of community or leisure uses in the Biscuit Factory Site. The delivery of these will create opportunities for social interaction which will in turn promote social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Climate change is attributed to the use of fossil fuel and resultant release of greenhouse gases in the fabrics of our daily living. By encouraging active travel and the use of public transport through the landscape design, the site will effectively encourage less use of private cars. The NSP policies will also ensure the development to achieve carbon neutral through thoughtful design and offset contributions.
IIAO 7	To improve the air quality	✓✓	✓✓	By promoting modal shift of transport to public transport and walking, the prescribed requirements will effectively reduce the air pollutants PM and NO2 generated from road traffic.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Whilst substantial demolition will create new waste demands to be managed, the NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	The site has been previously developed, which offers a regeneration opportunity to remediate contaminated land, but soil quality is unlikely to significantly improve.

IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	Both London View Management Framework (LVMF) and the Archaeological Tier 4 designation are taken into account for the site development. This is to ensure the development will respect the local character, heritage and townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site location consists of a number of original warehouse buildings which are identified as unlisted heritage assets. The site is also in proximity to Grade II listed Church of St. Crispin with Christchurch. The site requirement prescribes that the heritage assets should be retained and integrated to the wider, comprehensive redevelopment. This is to ensure the development will respect the local character and heritage, and enhance the setting of historical assets.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The provision of green links, including Low Line Walking Routes, the cycling routes and walking paths to key destinations in the area, will encourage the urban greening and landscape enhancements. These will provide opportunities to create new habitats and enhance biodiversity. The accessibility to the large open spaces will also promote the public appreciation of the green infrastructure.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 22) will have a “more vulnerable” use (mixed use including employment, town centre, residential uses and open space) in Flood Zone 3a and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- An increase in high-quality and predominantly office accommodation will be important to support the growth of the local economy and bring increased job opportunities and prosperity to the area. A variety of town centre uses and retail should be accommodated at ground floor level to provide active frontages onto the Low Line walking route running alongside the railway viaduct, an undesignated heritage asset;</li> <li>- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.</li> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant</li> <li>- Encouraging delivery of the Low Line walking route creates improved accessibility and the quality of experience for walking. Improved walking networks encourage active travel and exercise, which is beneficial for health. Bringing more destinations closer to residents through strategic walking routes and improved accessibility, with improved pavements, crossings and public spaces encourage people to walk more. Measures to encourage walking can also help tackle social isolation and routes should accommodate parents and older or disabled people.</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the SFRA report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Basement dwellings should not be permitted in this area.</p> <p>Both applications relevant to this site have submitted FRAs both confirming that the sites were at low risk of flooding and recommendations were outlined in the reports to minimise flood risk impacts. The Environment Agency were consulted on both applications and did not object to the proposals.</p>

				As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	By promoting modal shift of transport to public transport and walking, the prescribed requirements will effectively reduce the reliance on private vehicles.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The replacement school, provision of replacement employment space and the well-established network of walking routes and public realms as prescribed will become the social, economic and environmental infrastructure, underpinning the future development on site. Not only will the development benefit the future occupiers, the landscape design, the community facilities and employment floorspace will ensure the wider community in the area will share the benefits of the regeneration opportunity.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP11 – Tower Workshops				
IIA Objectives	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	New and replacement employment floorspace (B use class – suitable for small business) will be provided. This ensures no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased job opportunities. In particular, the employment floorspace is suitable for small and independent businesses and lead to a diverse economy and job opportunities in the area, thus tackling poverty and encouraging wealth creation.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The employment space will provide on-job training opportunities for the local community and increase the skilled labour in the long run. Under NSP policies, training will also be provided to the local community during the construction of the development on site.
IIAO 3	To improve the health of the population	✓✓	✓✓	The retained and potential uplift in job opportunities from the employment space will help reduce poverty as an underlying determinant of health. Meanwhile, the site will potentially bring forward new homes and solve the overcrowding issue which is attributed to the acute housing need. A
			✓✓	Encouraging delivery of the Low Line walking route creates improved accessibility and the quality of experience for walking. Improved walking networks encourage active travel and exercise, which is beneficial for health. Bringing more destinations closer to residents through strategic walking routes and improved accessibility, with improved pavements, crossings and public spaces encourage people to walk more. Measures to encourage walking can also help tackle social isolation and routes should accommodate parents and older or disabled people
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The active frontages facing Maltby Street and the east-west walking route to the south of the site will Improve permeability and open up space to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The landscape design including the walking route will not only benefit the future occupiers, but also the local community by increasing the connectivity within the area. Meanwhile, were new homes provided, our NSP policies will ensure the development to bring forward different units and tenures to meet the needs of households with different incomes. This will create a mixed community that is inclusive to all groups.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	-	-	The substantial demolition and construction may generate greenhouse gases, however NSP policies seek to minimise carbon dioxide emissions from development in order of with energy hierarchy and in compliance with sustainability standards.
IIAO 7	To improve the air quality	✓	✓	A new east-west pedestrian and/or cycle link between Borough High Street and Swan Street will support increased walking and cycling routes can help to provide improved air quality through more active modes of transport by reducing greenhouse gas emissions.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Whilst substantial demolition will create new waste demands to be managed, the NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.  NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	The site has been previously developed, which offers a regeneration opportunity to remediate contaminated land, but soil quality is unlikely to significantly improve.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	The site is identified to lie within the Background Assessment Area of LVMF view 2A.1- Parliament Hill summit to St. Paul's Cathedral, and partially falls within the Background Assessment Area of LVMF view 3A.1 – Kenwood Viewing Gazebo to St. Paul's Cathedral. The application of borough views policy in NSP ensures the development will respect the local character, heritage and townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is located in the Tier 1 Archaeological Priority Area (APA) – North Southwark and Roman Roads. Also, it is in proximity to Abbey Buildings. The application of archaeology policy in NSP ensures the development will respect local character and heritage, and enhance the setting of historical assets.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity to St Mary Magdalane Churchyard (Borough Open Land). This will not be impacted as part of the future development.
IIAO 14	To reduce vulnerability to flooding	✓		The sequential test confirms that the site (in SFRA level 2 - Analysis 22) will have a “more vulnerable’ use (mixed use including employment, town centre, residential uses and open space) in Flood Zone 3a and therefore requires an additional exception test, which would be satisfied by the first criteria that the

			✓	<p>development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- An increase in high-quality and predominantly office accommodation will be important to support the growth of the local economy and bring increased job opportunities and prosperity to the area.</li> <li>- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.</li> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant</li> <li>- Encouraging delivery of the Low Line walking route creates improved accessibility and the quality of experience for walking. Improved walking networks encourage active travel and exercise, which is beneficial for health. Bringing more destinations closer to residents through strategic walking routes and improved accessibility, with improved pavements, crossings and public spaces encourage people to walk more. Measures to encourage walking can also help tackle social isolation and routes should accommodate parents and older or disabled people.</li> <li>- Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- The active frontages facing Maltby Street and the east-west walking route to the south of the site will improve permeability and open up space to promote social interaction and the feeling of public safety.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the SFRA report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Basement dwellings should not be permitted in this area.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. Overtime through the provision of more homes, this should improve the affordability of homes if more homes are delivered, including, affordable homes. The provision of affordable homes is encouraged through the amendment proposed to Policy P1 to introduce the fast track route for affordable housing
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The requirement includes the provision of an east-west walking route to the south of the site linking Riley Road and Maltby Street. As a result, connectivity and walkability will improve in the area.
<b>IIAO 17</b>	To provide the necessary infrastructure	✓	-	The site allocation will not provide new infrastructure or result in the loss of existing infrastructure.

	to support existing and future development		✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development
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NSP12 – Chambers Wharf				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Town centre employment uses will be provided that are compatible with residential use. The uplift in employment space will create job opportunities, which will effectively tackle poverty and encourage wealth creation.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The employment floorspace and a new community hall provided on site will be a vital skills base to local residents. Under NSP policies, training will also be provided to the local community during the construction of the development on site.
			✓	The policy requires larger units as part of the new homes delivered on site, which will effectively address the overcrowding issue in the borough. Overcrowding in family households can result in children doing worse at school than their non-overcrowded peers. Our most deprived neighbourhoods have a higher concentration of residents from a Black or minority ethnic background. One of the indicators of deprivation is housing conditions, including overcrowding. From this, these groups have most to gain from the delivery of family sized housing, and should help to reduce overcrowding and so educational disparity between ethnic groups.
IIAO 3	To improve the health of the population	✓✓	✓✓	The creation of new homes and in particular family homes will help to meet the acute housing needs and the overcrowding issue in the borough, which is one of the significant determinants of health. In addition to the employment space which will improve the livelihood of the local community, a community hall will also be provided to encourage social interaction among residents for enhanced mental well-being.
			✓✓	The site will also bring forward an enhanced River Thames path, supported by active frontage along the route of the path. This will provide opportunities for urban greening and enhanced landscaping, and in turn improve the mental well-being of the population. The improved connectivity for cyclists and pedestrians through the landscape design will also encourage local residents to travel actively and exercise.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The urban greening and enhanced landscaping, along with active frontage and the pedestrian and cyclists' path provided on site, will increase footfall and promote 'eyes on the street'. As a result, it will improve the perception of public safety and discourage offensive behaviour.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Public realm will be created with inclusive landscape design that is accessible to all and promote diversity and social interaction among different groups with different incomes and backgrounds. The provision of a community hall will also encourage social inclusion and cohesion in the community.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion.
			✓✓	Additional text has been added to highlight the delivery of community or leisure uses in the Biscuit Factory Site. The delivery of these will create opportunities for social interaction which will in turn promote social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Through the extension of Thames Path and the pedestrian-friendly routes on site, the development will encourage actively travel such as walking and cycling as an alternative to taking vehicles which is attributed significantly to greenhouse gases emission.  Although construction will create a substantial demand for building materials that will indirectly contribute to climate change, NSP policies ensure the development and the future operation will achieve carbon zero through carbon off-set contribution and thoughtful design.
IIAO 7	To improve the air quality	✓✓	ü✓	The provision of accessible and pedestrian-friendly public realm and walking paths will effectively encourage the change of transport mode from using vehicles to active travel such as walking and cycling. This will in turn lower the air pollution caused by combustion of vehicles.  Although there will be short-term air pollution issues during the construction process, NSP policies and the development management process require mitigation and reduction measures from the development.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Whilst substantial demolition will create new waste demands to be managed, the NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from

	resources		-	development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	The site has been previously developed, which offers a regeneration opportunity to remediate contaminated land, , but soil quality is unlikely to significantly improve.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	The site is identified to lie within the river prospect Borough View from Kings Stairs Gardens to Tower Bridge. The site lies within LVMF view 5A.2 - Greenwich Park Wolfe Statue to Tower Bridge and St Paul's Cathedral. Any proposals for tall buildings on site is required to set at least one block back from the river bank. Redevelopment must be sensitive to the Thames Policy Area, where building heights should be lower in close proximity to the River Thames. All these policies will ensure the development to respect the local character and townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is in proximity of Grade II listed buildings Riverside School, the Old Justice Public House, 33 Bermondsey Wall West and East Lane Stairs. Tier 1 APA designation. The site is also located in APA1 - North Southwark and Roman Road. In light of the heritage and archaeological value of the area, our NSP policies ensure the development will respect the local character and heritage, as well as the setting of historical assets.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The enhanced river frontage and the walking and cycling paths will be promoted through urban greening and enhanced landscape, which will create green corridors, provide natural habitats and promote biodiversity.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 22) will have a "more vulnerable" use (mixed use including employment, town centre, residential uses and open space) in Flood Zone 3a and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- An increase in high-quality and predominantly office accommodation will be important to support the growth of the local economy and bring increased job opportunities and prosperity to the area.</li> <li>- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.</li> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant</li> <li>- Encouraging delivery of the Low Line walking route creates improved accessibility and the quality of experience for walking. Improved walking networks encourage active travel and exercise, which is beneficial for health. Bringing more destinations closer to residents through strategic walking routes and improved accessibility, with improved pavements, crossings and public spaces encourage people to walk more. Measures to encourage walking can also help tackle social isolation and routes should accommodate parents and older or disabled people.</li> <li>- Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- The active frontages facing Maltby Street and the east-west walking route to the south of the site will improve permeability and open up space to promote social interaction and the feeling of public safety.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the SFRA report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Basement dwellings should not be permitted in this area.</p> <p>The granted application on the site submitted a site specific flood risk assessment relating to the development. The flood risk assessment has detailed construction techniques such as ensuring residential accommodation is built at floor levels AOD which will minimise the risk of significant flooding to the unit, and ensuring fences and barriers use permeable materials in order not to restrict the flow of water and raise flood levels.</p>

				<p>The Environment Agency were consulted on both applications and did not object to the proposals.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. Overtime through the provision of more homes, this should improve the affordability of homes if more homes are delivered, including, affordable homes. The provision of affordable homes is encouraged through the amendment proposed to Policy P1 to introduce the fast track route for affordable housing
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The provision of accessible and pedestrian-friendly public realm and walking paths will effectively encourage the change of transport mode from using vehicles to active travel such as walking and cycling.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site will not only provide a significant supply of new homes, but also bring forward a range of infrastructure from a community hall, employment floorspace to pedestrian-friendly routes and public realm . In turn, the development will benefit not only the future occupiers, but also the wider community who are going to reap the benefits from the regeneration opportunity.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

Integrated impact assessment for

**AV04 Blackfriars Road**

Including

**Blackfriars Road Area Vision and site allocations NSP13 – NSP20**

- NSP13: Conoco House, Quadrant House, Edward Edwards House and Suthring House
- NSP14: Friars House, 157-168 Blackfriars Road
- NSP15: Land enclosed by Colombo Street, Meymott Street and Blackfriars Road
- NSP16: Ludgate House and Sampson House, 64 Hopton Street
- NSP17: Southwark Station and 1 Joan Street
- NSP18: McLaren House, St George's Circus
- NSP19: Land between Paris Gardens, Colombo Street, Blackfriars Road and Stamford Street
- NSP20: 1-5 Paris Garden and 16-19 Hatfields

IIAO	Blackfriars Road				NSP13	NSP14	NSP15	NSP16	NSP17	NSP18	NSP19	NSP20
	Area wide	S	M	L								
IIAO 1	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 2	✓	-	✓	✓	✓	✓✓	✓✓	✓	✓	✓	✓	✓
IIAO 3	✓✓	✓	✓✓	✓✓	✓✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 4	✓	-	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 5	✓	x	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 6	✓	?	✓	✓	-	✓	✓	-	-	-	-	-
IIAO 7	?	?	-	?	-	-	-	✓✓	✓✓	-	✓✓	✓✓
IIAO 8	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 9	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 10	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 11	✓✓	-	✓	✓✓	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓✓
IIAO 12	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓✓	✓✓
IIAO 13	✓	-	✓	✓	✓	-	✓	✓	✓	-	✓✓	✓✓
IIAO 14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 15	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 16	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 17	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
Avg.	56%	20%	50%	56%	56%	56%	59%	62%	65%	56%	74%	71%

Blackfriars Road Area Vision and site allocations NSP13 – NSP20						
IIA Objectives	Description	Area wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIA 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	On employment sites the re-provision of at least the equivalent level of employment floorspace or 50% of the sites total development capacity is safeguarded, whichever is greater. This will ensure no employment floorspace is lost and in many cases will provide an uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. The area vision looks to enhance the thriving economy by being promoted as an international destination for business headquarters and home to small and medium sized businesses, providing flexible workspace alongside cultural, leisure and arts facilities to capitalise upon the thriving local tourism industry. This will be boosted by the town centre uses and active frontages proposed across many of the sites to create a vibrant urban area and generate a more diverse supply of local job opportunities. Additional wording has been added to reiterate the provision of employment floorspace and cultural floorspace which is crucial for employment and wealth provision.
IIA 2	To improve the education and skill of the population	✓	-	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIA 3	To improve the health of the population	✓✓	✓	✓✓	✓✓	Provision of town centre uses such as D1 and D2, which can include community centres and health facilities, specifically on NSP15 and 16, will continue to serve the local community to ensure sufficient, accessible and high quality health services and community facilities for the existing and future populations. Enhancement of the low-line walking route, green links and planned cycle networks will promote active lifestyles and help reduce the causes and exposure to poor air quality. High density development envisaged will free up space and routes between building plots to improve legibility and promote social interaction. More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
IIA 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	New public spaces and the vibrant mix of uses proposed around Paris Gardens will improve legibility and deliver a vibrant destination and hub of activity which draws together a variety of groups to promote social cohesion. Improved permeability and activation of frontages, particularly along the low-line route, will open up spaces to promote social interaction and the feeling of public safety.
IIA 5	To promote social inclusion, equality, diversity and community cohesion	✓	x	✓	✓	High quality and inclusive public realm enhancements will be accessible to all groups. Low-line, green links and planned cycle ways will create a more legible urban environment to avoid physical barriers and address issues of severance. The new public space and the vibrant mix of uses proposed Paris Gardens (NSP19 and NSP20) will deliver a vibrant destination and hub of activity which draw together a variety of groups and promote social cohesion. Provision of community and leisure uses for the benefit of new residents and the existing local community proposed at Ludgate House and Sampson House (NSP16) as well as the retention of the community centre, at NSP15 will be accessible to all groups and encourage social interaction. Public realm and accessibility enhancements around

						Southwark Station will improve access to facilities and opportunities for all. There may also be disruptions to local communities due to reconstruction from the concentration of largescale redevelopment in a localised area in the short term which will have to be carefully managed to mitigate these impacts. Additional wording has bene added to support the delivery of community and leisure floorspace to provide additional amenities for local residents, to promote social inclusion and community inclusion and indirectly healthier, active lifestyles.
IIA 6	To reduce contributions to climate change	✓	?	✓	✓	Low-line, green links, planned cycle ways and improved access to Southwark Station will promote active and sustainable transport modes, improving air quality and reducing greenhouse gas emissions. Enhanced green linkages and new public space proposed at Paris Gardens will encourage urban greening to adapt to the effects of climate change, reduce the urban heat island effect and increase ecological resilience in this ecology restoration zone. Despite excellent public transport links, Blackfriars Road experiences high levels of traffic and congestion – CO2 emissions suffer as a result and these could be exacerbated by accelerated levels of construction and demolition. NSP policies seek to minimise carbon dioxide emissions from development to offset this impact.
IIA 7	To improve the air quality	?	?	-	?	Low-line, green links and planned cycle ways will promote active transport modes, helping to address the causes of poor air quality. Air quality in the area suffers as a result of high levels of congestion, particularly along Blackfriars Road; this could be exacerbated by accelerated levels of construction and demolition. NSP policies requires development to meet air quality neutral standards and improve air quality
IIA 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIA 9	To encourage sustainable use of water resources	-	-	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIA 10	To maintain and enhance the quality of land and soils	-	-	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land but soil quality is unlikely to significantly improve due to fewer largescale opportunities for additional green space due to the density of the vision area.
IIA 11	To protect and enhance quality of landscape and townscape	✓✓	-	✓	✓✓	Development will be respectful to the designations of conservation areas where they apply. All existing open space is due to be retained whilst new public space proposed site allocations adjacent to Paris Gardens (NSP19 and NSP20) will encourage urban greening and landscape enhancements. Enhanced high-quality public realm should provide for a much improved townscape.
IIA 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	Development will be respectful to the designations of conservation areas and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIA 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	All existing open space is due to be retained whilst new public space is proposed as part of NSP19 at Paris Gardens and enhanced green links will encourage urban greening and landscape enhancements. They provide the opportunity to create new habitats which will enhance biodiversity and reinforce the aspirations of the ecology restoration zones (River Thames Restoration Zone and

						Red Cross Gardens - and surrounds Restoration Zone).
IIA 14	To reduce vulnerability to flooding	✓	✓	✓	✓	<p>The sites within the Blackfriars Road vision are within flood risk zone 3 and benefit from defences. This means that where more vulnerable sites are proposed the exception test will be required to assess the benefits of the development and the flood risk mitigation measures proposed.</p> <p>Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.</p>
IIA 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	<p>The area vision and site allocations should deliver a significant number of new homes across the area. If these are delivered to policy requirements they will offer a range of different units and tenures which will provide for a range of different needs and create inclusive residential schemes accessible to all groups.</p>
IIA 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	<p>The vision area already benefits from excellent public transport connections, supporting the intensification of development. Low-line, green links, planned cycle ways and station access improvements will further promote active transport modes. Provision of an enhanced accessible tube station at NSP17: Southwark Station will encourage use of public transport.</p>
IIA 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	<p>Requirements for town centre uses such as D1 and D2 uses, which can include community centres and health facilities, will continue to serve the local community to ensure sufficient, accessible and high quality health services for the existing and future populations. The new public space and the vibrant mix of uses proposed as part of NSP19 at Paris Gardens will deliver a vibrant destination and hub of activity which draw together a variety of groups and promote social cohesion. Provision of community and leisure uses for the benefit of new residents and the existing local community proposed at NSP16 Ludgate House as well as the retention of the community centre at NSP15 will be accessible to all groups and encourage social interaction. Public realm and accessibility enhancements around Southwark Station will improve access to facilities and opportunities for all. Green links and the planned cycle networks will enhance connectivity across the sub-area.</p>

NSP13: Conoco House, Quadrant House, Edward Edwards House and Suthring House				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
IIAO 2	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	The area is currently well-served by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Public realm improvements will support safer streets and discourage offensive and criminal behaviours.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunity for more families and individuals to reside near to employment opportunities.
			✓✓	Improved public realm will encourage community and leisure uses on the street which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	Additional text has been added to highlight the delivery of community or leisure uses. The delivery of these will create opportunities for social interaction which will in turn promote social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	-	-	The site does not have any measures in place that directly address the reduction of carbon emissions.
IIAO 7	To improve the air quality	-	-	The site does not have any measures in place that directly address air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is in proximity of Grade II listed Rochester House, Christ Church and the undesignated heritage asset the Rectory. The site is in proximity of the Roupell Street Conservation Area in Lambeth. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.

IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity to Christchurch Gardens (Borough Open Land and Site of Importance for Nature Conservation). These will be preserved as part of future development.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 1) will have a “more vulnerable” use (mixed use including employment, town centre and residential uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.</li> <li>- Various economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough. By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing. It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people;</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- Any redevelopment should provide public realm enhancements, to offer spaces for meeting, and informal recreation, to allow visitors and residents to explore and enjoy the area;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- The site allocation already benefits from excellent public transport connections, supporting the intensification of development. The requirement to improve pedestrian movement and permeability through the site will further promote active transport modes.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Basement dwellings should not be permitted on this site.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	ü✓	✓✓ ✓✓ ✓✓ ✓✓	<p>Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</p> <p>It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.</p> <p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.</p> <p>Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p>

			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
<b>IIO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The site allocation already benefits from excellent public transport connections, supporting the intensification of development. The requirement to improve pedestrian movement and permeability through the site will further promote active transport modes.
<b>IIO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could provide D uses, this could include health, facilities, training centres, community centres, cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP14: Friars House, 157-168 Blackfriars Road				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
		✓✓	✓✓	Redevelopment will retain a similar mix of uses, with employment uses remaining the principal use, albeit with an uplift on the existing density. An increase in high-quality office accommodation will be important to support the growth of the local economy and bring increased job opportunities and prosperity to the area. A variety of town centre uses and retail should be accommodated at ground floor level to provide active frontages along Blackfriars Road that will serve the local area. Transforming an office site into a mixed use development with new homes, green links, open spaces and public realm and active frontages with ground floor town centre use, provides essential social infrastructure for surrounding area, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.
IIAO 2	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities will be generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	The area is currently well-serviced by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring "eyes on the streets" to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunity for more families and individuals to reside in a prime location in the borough, near to employment opportunities. Transforming an office site into a mixed use development with new homes, green links, open spaces and public realm and active frontages with ground floor town centre use, provides essential social infrastructure for surrounding area, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	Additional text has been added to highlight the delivery of community or leisure uses. The delivery of these will create opportunities for social interaction which will in turn promote social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	-	-	The site does not have any measures in place that directly address the reduction of carbon emissions, although P69 of the NSP requires a minimum of 40% carbon reductions to be achieved on site.
IIAO 7	To improve the air quality	-	-	The site does not have any measures in place that directly address air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.

<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is in proximity of Grade II listed Peabody Estate and includes Blackfriars Foundry, an undesignated heritage asset. Although not formally listed, the buildings along Webber Street exhibit greater historical merit and character than Friar's House. Site is not within a designated conservation area but lies between King's Bench and Valentine Place Conservation Areas. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	-	-	The site is not in proximity to designated open space.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 2) will have a "more vulnerable" use (mixed use including employment, town centre and residential uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- An increase in high-quality office accommodation will be important to support the growth of the local economy and bring increased job opportunities and prosperity to the area. A variety of town centre uses and retail should be accommodated at ground floor level to provide active frontages along Blackfriars Road that will serve the local area;</li> <li>- Transforming an office site into a mixed use development with new homes, green links, open spaces and public realm and active frontages with ground floor town centre use, provides essential social infrastructure for surrounding area, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- Various economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough. By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing. It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people;</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Any redevelopment should provide public realm enhancements, to offer spaces for meeting, and informal recreation, to allow visitors and residents to explore and enjoy the area;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring "eyes on the streets" to improve the perception of safety and discourage offensive and criminal behaviours;</li> <li>- The site allocation already benefits from excellent public transport connections, supporting the intensification of development. The requirement to improve pedestrian movement and permeability through the site will further promote active transport modes.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood</p>

				<p>risk elsewhere, and, where possible, reducing flood risk overall.</p> <p>Basement dwellings should not be permitted in Flood Zone 3. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Ground conditions should be confirmed through site investigation, and dewatering of excavations and basement waterproofing implemented where required.</p> <p>A flood risk assessment was submitted with the planning permission on site. The Environmental Agency were consulted on the application and have recommended several conditions that have been attached to the consent issued alongside conditions that have been recommended by the council's own Flood and Drainage Team.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. Over time, and through the provision of more homes, this should improve the affordability of homes as more homes are delivered, including affordable homes. The provision of affordable homes is encouraged through the amendment proposed to Policy P1 to introduce the fast track route for affordable housing.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The site allocation already benefits from excellent public transport connections, supporting the intensification of development. The requirement to improve pedestrian movement and permeability through the site will further promote active transport modes.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could provide D uses, this could include health, facilities, training centres, community centres, cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP15: Land enclosed by Colombo Street, Meymott Street and Blackfriars Road**

IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
		✓✓	✓✓	Redevelopment will retain a similar mix of uses, with employment uses remaining the principal use, albeit with an uplift on the existing density. An increase in high-quality office accommodation will be important to support the growth of the local economy and bring increased job opportunities

				and prosperity to the area. A variety of town centre uses and retail should be accommodated at ground floor level to provide active frontages along Blackfriars Road that will serve the local area.
<b>IIAO 2</b>	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	The area is currently well-served by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.
			✓✓	Redevelopment should enhance walking routes and provide public realm improvements to Colombo Street and Blackfriars Road, as well as direct access to the Cycle Super Highway. This should promote active travel and encourage more exercise for local residents.
			✓	The re-provision or improvement of D-use class supports community and leisure, which overall provides well-being benefits to residents.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunity for more families and individuals to reside in a prime location in the borough, near to employment opportunities.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	Additional text has been added to highlight the delivery of community or leisure uses. The delivery of these will create opportunities for social interaction which will in turn promote social inclusion and community cohesion.
<b>IIAO 6</b>	To reduce contributions to climate change	-	-	The site does not have any measures in place that directly address the reduction of carbon emissions, although P69 of the NSP requires a minimum of 40% carbon reductions to be achieved on site.
<b>IIAO 7</b>	To improve the air quality	-	-	The site does not have any measures in place that directly address air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources			NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, , but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. Development proposals must recognise the site's close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to any cross-boundary issues and the provisions of policies and site allocations within reasonable proximity of the site as set out in the Lambeth Local Plan.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is in proximity of Grade II listed Peabody Estate and includes Blackfriars Foundry, an undesignated heritage asset. Although not formally listed, the buildings along Webber Street exhibit greater historical merit and character than Friar's House. Site is not within a designated conservation area but lies between King's Bench and Valentine Place Conservation Areas. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity to the designated Christchurch Gardens (Borough Open Land and Site of Importance for Nature Conservation) Paris Gardens (Borough Open Land). These are protected as part of any proposed, future redevelopment.

IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 1) will have a “more vulnerable’ use (mixed use including employment, town centre, community and residential uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- New community facilities will improve sense of community and reduce the risk of social isolation;</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- Redevelopment should enhance walking routes and provide public realm improvements to Colombo Street and Blackfriars Road, as well as direct access to the Cycle Super Highway. This should promote active travel and encourage more exercise for local residents;</li> <li>- The re-provision or improvement of D-use class supports community and leisure, which overall provides well-being benefits to residents;</li> <li>- Redevelopment should enhance walking routes and provide public realm improvements to Colombo Street and Blackfriars Road, as well as direct access to the Cycle Super Highway. This will promote sustainable transport and minimise the need to travel by car.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. Application 15/AP/0237 have been granted planning permission on this site, and Flood Risk Assessments have been submitted for the application. The site-specific FRA demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.</p> <p>Basement dwellings are not permitted in Flood Zone 3. A Basement Impact Assessment is required for any development proposals incorporating new or extended basement areas for non-domestic use. The Environment Agency was consulted on application 15/AP/0237 and had no objections to the proposed use of the basement.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	<p>The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.</p> <p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement</p> <p>Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p> <p>By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.</p>

			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment should enhance walking routes and provide public realm improvements to Colombo Street and Blackfriars Road, as well as direct access to the Cycle Super Highway. This will promote sustainable transport and minimise the need to travel by car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could provide D uses, this could include health, facilities, training centres, community centres, cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

<b>NSP16: Ludgate House and Sampson House, 64 Hopton Street</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The existing uses on the site include Office (B1) – 23,023 m2; Sampson House disaster recovery and data centre (sui generis) – 55,060 m2; Nightclub (sui generis) – 1,618 m2; Ludgate House – 23,023 m2.  The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
<b>IIAO 2</b>	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	Redevelopment must improve site permeability with new walking routes through the site to the Thames path and Blackfriars Station, and the Low Line adjacent to the viaduct. Redevelopment must be sensitive to existing trees of significance. This should promote active travel and encourage more exercise for local residents.
			✓✓	The provision of community and leisure uses (D1, D2) class will overall benefit new residents and the existing local community. It will also provide valuable infrastructure to improve health and well-being benefits to residents.
			✓✓	To provide new open space of at least 15% of the site area supports the current area (Bankside and the Borough) which is deficient in parks and other green spaces. New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialisation, nature conservation, food growing and cultural events. This will maintain and improve open spaces to ensure health and wellbeing benefits associated with these activities are accrued.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and	✓✓	✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunities for more families and individuals to reside in a prime location in the borough, near to employment opportunities.

	community cohesion			
			✓✓	The site allocation proposes the creation of a new large open space. This will mitigate the pressure from development on existing open space and add to a sense of arrival to the neighbourhood , which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	New community facilities will improve opportunities for social interaction and social cohesion in the area.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	To provide new open space of at least 15% of the site area supports the current area (Bankside and the Borough) which is deficient in parks and other green spaces. New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialisation, nature conservation, food growing and cultural events. This will support community activities which encourage social inclusion, equality, diversity and community cohesion.
			✓✓	Additional text has been added to highlight the delivery of community or leisure uses. The delivery of these will create opportunities for social interaction which will in turn promote social inclusion and community cohesion.
<b>IIAO 6</b>	To reduce contributions to climate change	-	-	The site does not have any measures in place that directly address the reduction of carbon emissions, although P69 of the NSP requires a minimum of 40% carbon reductions to be achieved on site.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	A more walkable streetscape will improve and encourage active travel. New Open space further reduces the intensification of the land use and should improve the air quality, supporting biodiversity.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. Redevelopment must be sensitive to the Thames Policy Area, where building heights should be lower in close the proximity to the River Thames. Development should be of an appropriate density and design that responds positively to its context.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is within the setting of Grade II listed buildings including Blackfriars Bridge, as well as being in proximity of Grade II* Hoptons Almshouses and undesignated heritage assets including the Tate Modern, River Walk and the railway viaduct. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity		✓	The site is in proximity to the Tate Modern (Borough Open Land). These are protected as part of any proposed, future redevelopment. Street trees will be protected.
			✓	The site allocation proposes the creation of a new large open space. This will mitigate the pressure from development on existing open space and add to a sense of arrival to the neighbourhood , which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓	The site allocation will improve enjoyment of the Thames Path; and mark an arrival point into Southwark; and enhance the Low Line and setting of the railway viaduct. This will all work to contribute the green infrastructure in the area and improve the existing green corridors.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (in SFRA level 2 - Analysis 1) will have a "more vulnerable" use (mixed use including residential, employment, town centre, community and leisure uses and open space) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows: <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> </ul>

- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development;
- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;
- The provision of community and leisure uses (D1, D2) class will overall benefit new residents and the existing local community. It will also provide valuable infrastructure to improve health and well-being benefits to residents;
- The provision of open space will promote community cohesion and equality to local population. This will encourage community interaction and active, healthy lifestyles and social cohesion;
- New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialization, nature conservation, food growing and cultural events. This will maintain and improve open spaces to ensure health and wellbeing benefits associated with these activities are accrued.
- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;
- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction;
- Any redevelopment should provide public realm enhancements, to offer spaces for meeting, and informal recreation, to allow visitors and residents to explore and enjoy the area;
- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;
- Redevelopment must improve site permeability with new walking routes through the site to the Thames path and Blackfriars Station, and the Low Line adjacent to the viaduct. Redevelopment must be sensitive to existing trees of significance. This should promote active travel and encourage more exercise for local residents;
- A more walkable streetscape will improve and encourage active travel. New Open space further reduces the intensification of the land use and should improve the air quality, supporting biodiversity;
- The site allocation proposes the creation of a new large open space. This will mitigate the pressure from development on existing open space and add to a sense of arrival to the neighbourhood, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction;
- Redevelopment must improve site permeability with new walking routes through the site to the Thames Path and Blackfriars Station, and the Low Line adjacent to the viaduct. Redevelopment must be sensitive to existing trees of significance;
- The site allocation will improve enjoyment of the Thames Path; and mark an arrival point into Southwark; and enhance the Low Line and setting of the railway viaduct. This will contribute the green infrastructure in the area and promote active travel over vehicular travel, which causes risk for congestion.

To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. Planning application 12/AP/3940 has been granted on site. A flood risk assessment has been submitted with the application and the associated breach analysis demonstrates that the site would not flood in the event of a breach of the Thames tidal defences. The Environment Agency were consulted on the application and they have advised that they would have no objection to the proposal subject to the attachment of conditions in relation to contamination and the request for the submission of a surface water drainage scheme. The site-specific FRA which demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.

Basement dwellings should not be permitted in Flood Zone 3. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. With regards to planning application 12/AP/3940, the basement will be used for car parking and servicing only.

				As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment must improve site permeability with new walking routes through the site to the Thames path and Blackfriars Station, and the Low Line adjacent to the viaduct. Redevelopment must be sensitive to existing trees of significance.
			✓✓	The site allocation will improve enjoyment of the Thames Path; and mark an arrival point into Southwark; and enhance the Low Line and setting of the railway viaduct. This will contribute the green infrastructure in the area and promote active travel over vehicular travel, which causes risk for congestion.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could provide D uses, this could include health, facilities, training centres, community centres, cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP17: Southwark Station and 1 Joan Street				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The existing uses on the site include Tube Station (Sui Generis) – 728 m2 (above ground portion) and a Temporary arts space (D1) – 655 m2  The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
IIAO 2	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	The provision of cultural use (D1) class will overall benefit new residents and the existing local community. It will also provide valuable infrastructure

				to improve health and well-being benefits to residents.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunity for more families and individuals to reside in a prime location in the borough, near to employment opportunities.
			✓✓	An enhanced public realm and more accessible tube station will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	New community facilities will improve opportunities for social interaction and social cohesion in the area.
			✓✓	Additional text has been added to highlight the delivery of community or leisure uses. The delivery of these will create opportunities for social interaction which will in turn promote social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	-	-	The site does not have any measures in place that directly address the reduction of carbon emissions, although P69 of the NSP requires a minimum of 40% carbon reductions to be achieved on site.
IIAO 7	To improve the air quality	✓✓	✓✓	A more walkable streetscape will improve and encourage active travel. New Open space further reduces the intensification of the land use and should improve the air quality, supporting biodiversity.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	The site is bounded by Blackfriars Road, Isabella Street and The Cut, and includes the Southwark Underground Station and concourse and the Platform Southwark building. Many arches in the railway viaduct fronting Isabella Street to the north of the site are currently in use as restaurants and bars. The surrounding area is characterised by a wide mix of town centre uses, including commercial, cultural, education, office, residential, and visitor accommodation. The surrounding buildings vary in design and have heights of between two and twenty storeys. Development should be of an appropriate density and design that responds positively to its context. Development proposals must recognise the site’s close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to any cross-boundary issues and the provisions of policies and site allocations within reasonable proximity of the site as set out in the Lambeth Local Plan. Development will be respectful to the designations of conservation areas and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is within the setting of Grade II listed buildings including Blackfriars Bridge, as well as being in proximity of Grade II* Hoptons Almshouses and undesignated heritage assets including the Tate Modern, River Walk and the railway viaduct. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity to the Tate Modern (Borough Open Land). These are protected as part of any proposed, future redevelopment. Street trees will be protected.
			✓	The site allocation proposes the creation of a new large open space. This will mitigate the pressure from development on existing open space.

			✓	The site allocation will improve enjoyment of the Thames Path; and mark an arrival point into Southwark; and enhance the Low Line and setting of the railway viaduct. This will all work to contribute the green infrastructure in the area.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 2) will have a “more vulnerable’ use (mixed use including employment, town centre, cultural and residential uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes._The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- A more walkable streetscape will improve and encourage active travel. New Open space further reduces the intensification of the land use and should improve the air quality, supporting biodiversity;</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- Redevelopment should provide access to the Cycle Super Highway and public realm improvements to Joan Street and Isabella Street;</li> <li>- Redevelopment of the site must maintain and improve access and egress from Southwark Station and Waterloo East Station;</li> <li>- An enhanced public realm and more accessible tube station. which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- New community facilities will improve opportunities for social interaction and social cohesion in the area;</li> <li>- The provision of cultural use (D1) class will overall benefit new residents and the existing local community. It will also provide valuable infrastructure to improve health and well-being benefits to residents.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.</p> <p>Basement dwellings should not be permitted in Flood Zone 3. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Ground conditions should be confirmed through site investigation, and dewatering of excavations and basement waterproofing implemented where required.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough_ In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes._The increased provision of affordable homes is encouraged

				through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment should provide access to the Cycle Super Highway and public realm improvements to Joan Street and Isabella Street.
			✓✓	Redevelopment of the site must maintain and improve access and egress from Southwark Station and Waterloo East Station.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could provide D uses, this could include health, facilities, training centres, community centres, cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP18: McLaren House, St George's Circus				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The existing uses on the site is Student accommodation (sui generis) 13,003m2.  The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
IIAO 2	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
			?	It is uncertain whether the site will include provision of student accommodation or instead provide new homes. The loss of student accommodation would negatively impact students at surrounding universities subsidised housing and near proximity to university. This would be outweighed by the creation of new homes which would benefit a wider demographic of local residents.
			✓	The new town centre usage would provide increased opportunity for employment, which would encourage skill creation among the local population.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring "eyes on the streets" to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.

IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunity for more families and individuals to reside in a prime location in the borough, near to employment opportunities.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	Additional text has been added to highlight the delivery of community or leisure uses. The delivery of these will create opportunities for social interaction which will in turn promote social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	-	-	The site does not have any measures in place that directly address the reduction of carbon emissions, although P69 of the NSP requires a minimum of 40% carbon reductions to be achieved on site.
IIAO 7	To improve the air quality	-	-	Increased provision of housing in this location could alleviate pressures for some people to travel long distances to get to employment.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	The site's prominent location and the rapidly changing context of the surrounding area, the site has the potential to accommodate development at a higher density than existing. The site is suitable for a residential-led mixed-use scheme, with town centre uses situated at ground floor level to activate the frontage of the development at St Georges Circus. The frontage to St George's Circus must be concave to retain the curved Circus. Redevelopment should retain the Cycle Super Highway and support the boulevard character on Blackfriars Road. Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is located within the setting of the Grade II* listed Obelisk and Grade II listed buildings on London Road, Borough Road, and the Peabody Buildings on Blackfriars Road. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	The site is not in the proximity to designated open spaces.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 2) will have a "more vulnerable" use (mixed use including residential or sui generis, and town centre uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant;</li> <li>- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will</li> </ul>

				<p>encourage interaction and usage amongst the local community, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction;</p> <ul style="list-style-type: none"> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring "eyes on the streets" to improve the perception of safety and discourage offensive and criminal behaviours;</li> <li>- Redevelopment should retain the Cycle Super Highway and support the boulevard character on Blackfriars Road. These nodes support active travel to the site.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.</p> <p>Basement dwellings should not be permitted in Flood Zone 3. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment should retain the Cycle Super Highway and support the boulevard character on Blackfriars Road. These nodes support active travel to the site.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could provide D uses, this could include health, facilities, training centres, community centres, cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP19: Land between Paris Gardens, Colombo Street, Blackfriars Road and Stamford Street**

IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The existing uses on the site is Office (B1) – 15,382 m2 and ground floor retail (A3) – 669 m2.  The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
IIAO 2	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
			✓✓	An increase in employment floorspace would provide increased opportunity for employment, which would encourage skill creation among the local population.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	Improving the connectivity provided by a new green link from Rennie Street to Paris Gardens would support active travel and exercise in the community, providing improved opportunities for cycling and walking. Overall this will improve the quality of life, and subsequently the health and well-being of the local population.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and improved ground floor active frontages on Paris Garden, Blackfriars Road and Samford Street would improve the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
			✓✓	Improve connectivity to provide a new green link from Rennie Street to Paris Gardens would improve feelings of safety in this area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	New employment uses will support economic activity for local communities, thereby alleviating employment pressures. Southwark needs to accommodate significant growth for offices and other workspaces which are growing in demand contributing to the central London economy and status as a world city. Sites that are within the Central Activities Zone are most in demand for delivery of offices and will be required to contribute to this growth by providing an increase in the amount of employment floorspace.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	Additional text has been added to highlight the delivery of community or leisure uses. The delivery of these will create opportunities for social interaction which will in turn promote social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	-	-	The site does not have any measures in place that directly address the reduction of carbon emissions, although P69 of the NSP requires a minimum of 40% carbon reductions to be achieved on site.
IIAO 7	To improve the air quality	✓✓	✓✓	Improved connectivity to provide a new green link from Rennie Street to Paris Gardens should improve air quality in the area by supporting more people to walk and cycle.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil

	quality of land and soils			quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Development proposals must recognise the sites close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to the provisions of policies and site allocations within reasonable proximity as set out in the Lambeth Local Plan. Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	The site includes listed buildings and their attached railings at 1 and 3-7 Stamford Street, the listing relates to a group of commercial buildings dating from c1875, which now house The Mad Hatter Hotel. The site is within the setting of listed buildings on Paris Garden. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The site is in proximity to the designated Christchurch Gardens (Borough Open Land and Site of Importance for Nature Conservation). Redevelopment must be sensitive to existing trees of significance. Redevelopment must provide a new link from Rennie Street to Paris Garden and links to the Cycle Super Highway. This will support the green corridor and biodiversity.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 1) will have a “more vulnerable” use (mixed use including employment, town centre and residential) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant;</li> <li>- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development;</li> <li>- An increase in employment floorspace would provide increased opportunity for employment, which would encourage skill creation among the local population;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough. New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- Town centre uses and improved ground floor active frontages on Paris Garden, Blackfriars Road and Samford Street would improve the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours;</li> <li>- Improving the connectivity provided by a new green link from Rennie Street to Paris Gardens would support active travel and exercise in the community, providing improved opportunities for cycling and walking. Overall this will improve the quality of life, and subsequently the health and well-being of the local population;</li> <li>- Improve connectivity to provide a new green link from Rennie Street to Paris Gardens would improve feelings of safety in this area;</li> <li>- New employment uses will support economic activity for local communities, thereby alleviating employment pressures. Southwark needs to</li> </ul>

				<p>accommodate significant growth for offices and other workspaces which are growing in demand contributing to the central London economy and status as a world city. Sites that are within the Central Activities Zone are most in demand for delivery of offices and will be required to contribute to this growth by providing an increase in the amount of employment floorspace;</p> <ul style="list-style-type: none"> <li>- Improved connectivity to provide a new green link from Rennie Street to Paris Gardens should improve air quality in the area by supporting more people to walk and cycle;</li> <li>- Redevelopment must provide a new link from Rennie Street to Paris Garden and links to the Cycle Super Highway.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. Planning application 16/AP/5239 has been granted on this site. A Flood Risk Assessment was submitted and the Environment Agency had no objections to the proposal.</p> <p>A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.</p> <p>Basement dwellings should not be permitted in Flood Zone 3. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. A Basement Impact Assessment was submitted for application 16/AP/5239 to support the non-domestic basement use and was considered acceptable.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment must provide a new link from Rennie Street to Paris Garden and links to the Cycle Super Highway.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could provide D uses, this could include health, facilities, training centres, community centres, cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP20: 1-5 Paris Garden and 16-19 Hatfields**

IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The existing uses on the site is Office (B1) – 16,785 m2.  The site will therefore provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
IIO 2	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
			✓✓	An increase in employment floorspace would provide increased opportunity for employment, which would encourage skill creation among the local population.
IIO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	Improving the connectivity provided by a new east-west link would support active travel and exercise in the community, providing improved opportunities for cycling and walking. Overall this will improve the quality of life, and subsequently the health and well-being of the local population.
IIO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and improved ground floor active frontages on Paris Garden and Hatfields would improve the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
			✓✓	A new east-west link would improve the walking in the area and therefore reduce fear of crime.
IIO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	New employment uses will support economic activity for local communities, thereby alleviating employment pressures. Redevelopment should create a new mixed-use hub of activity, with retail at the ground floor and an internal shopping parade. The southern portion of the site is suitable for new homes. Development should be of an appropriate density and design that responds positively to its context. Any redevelopment should provide new east-west links through the site. Transforming an office site into a mixed use development with new homes, green links, open spaces and public realm and active frontages with ground floor town centre use, provides essential social infrastructure for surrounding area, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	Additional text has been added to highlight the delivery of community or leisure uses. The delivery of these will create opportunities for social interaction which will in turn promote social inclusion and community cohesion.
IIO 6	To reduce contributions to climate change	-	-	The site does not have any measures in place that directly address the reduction of carbon emissions, although P69 of the NSP requires a minimum of 40% carbon reductions to be achieved on site.
IIO 7	To improve the air quality	✓✓	✓✓	Improved connectivity to provide a new green link from Rennie Street to Paris Gardens should improve air quality in the area by supporting more people to walk and cycle.
IIO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIO 9	To encourage sustainable use of	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.

	water resources			
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Development proposals must recognise the sites close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to the provisions of policies and site allocations within reasonable proximity as set out in the Lambeth Local Plan. Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	The site includes the Grade II listed former clays printing works and numbers 15 and 17 Hatfields and is in proximity of Grade II listed buildings 1-7 Stamford Street and Christ Church. Any redevelopment should sustain and enhance these assets. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The site is in proximity to Christchurch Gardens (Borough Open Land and Site of Importance for Nature Conservation), and Paris Gardens (Borough Open Land). These will be preserved with any future development.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis 1) will have a “more vulnerable” use (mixed use including employment, town centre and residential) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant;</li> <li>- Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development;</li> <li>- An increase in employment floorspace would provide increased opportunity for employment, which would encourage skill creation among the local population;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- Town centre uses and improved ground floor active frontages on Paris Garden and Hatfields would improve the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- Development proposals must recognise the sites close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to the provisions of policies and site allocations within reasonable proximity as set out in the Lambeth Local Plan. Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;</li> <li>- New employment uses will support economic activity for local communities, thereby alleviating employment pressures. Southwark needs to accommodate significant growth for offices and other workspaces which are growing in demand contributing to the central London economy and status as a world city. Sites that are within the Central Activities Zone are most in demand for delivery of offices and will be required to contribute to this growth by providing an increase in the amount of employment floorspace;</li> <li>- Improving the connectivity provided by a new east-west link would support active travel and exercise in the community, providing improved</li> </ul>

				<p>opportunities for cycling and walking. Overall this will improve the quality of life, and subsequently the health and well-being of the local population;</p> <ul style="list-style-type: none"> <li>- A new east-west link would improve the walking in the area and therefore reduce fear of crime;</li> <li>- New employment uses will support economic activity for local communities, thereby alleviating employment pressures. Redevelopment should create a new mixed-use hub of activity, with retail at the ground floor and an internal shopping parade. The southern portion of the site is suitable for new homes. Development should be of an appropriate density and design that responds positively to its context. Any redevelopment should provide new east-west links through the site. Transforming an office site into a mixed use development with new homes, green links, open spaces and public realm and active frontages with ground floor town centre use, provides essential social infrastructure for surrounding area, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- Improved connectivity to provide a new green link from Rennie Street to Paris Gardens should improve air quality in the area by supporting more people to walk and cycle.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific Flood Risk Assessment is required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. Planning application 17/AP/4230 has been granted on this site and a FRA was submitted as part of the application. The council's flood risk and drainage team acknowledge that the new build office will reduce surface water runoff to an acceptable level through the incorporation of a 140 cubic metre attenuation tank. Additional attenuation will be achieved via the roof gardens.</p> <p>Basement dwellings should not be permitted in Flood Zone 3. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Application 17/AP/4230 proposes predominantly ancillary storage and plant areas in the basement.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment must provide a new east-to west link, which would support walking and cycling to the area.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialiation, nature conservation, food growing and cultural events
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

## Integrated impact assessment for

### AV.05 Camberwell

Including

- NSP21: Camberwell Station
- NSP22: Burgess Business Park.
- NSP23: Butterfly Walk, Morrison's Car Park and Police station
- NSP24: Valmar Trading Estate
- NSP25: Camberwell Bus Garage
- NSP26 Walworth Bus Garage, Camberwell
- NSP27 Land Between Camberwell Station Road and Warner Road
- NSP28 Iceland, 120-132 Camberwell Road
- NSP29 49 Lomond Grove
- NSP30 83 Lomond Grove
- NSP31 123 Grove Park
- NSP32 Camberwell Green Magistrates Court
- NSP33 Denmark Hill Campus East

	AV05				NSP21	NSP22	NSP23	NSP24	NSP25	NSP26	NSP27	NSP28	NSP29	NSP30	NSP31	NSP32	NSP33
	Area wide	S	M	L													
I1AO 1	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	-
I1AO 2	✓	-	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	-	✓✓	✓✓
I1AO 3	✓	-	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓✓
I1AO 4	✓	-	✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓
I1AO 5	✓	X	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	-
I1AO 6	✓	?	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	-	✓✓	✓✓
I1AO 7	✓	?	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	-	✓	✓
I1AO 8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
I1AO 9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
I1AO 10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
I1AO 11	✓✓	-	✓	✓✓	✓	✓	✓	✓	✓✓	✓	-	-	-	-	-	-	-
I1AO 12	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	-	✓	✓	-
I1AO 13	✓	-	✓	✓	✓	✓✓	✓	✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓
I1AO 14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
I1AO 15	✓✓	✓	✓✓	✓✓	-	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	-
I1AO 16	✓✓	-	✓	✓✓	✓	✓✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	-	✓	-
I1AO 17	✓	-	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓✓	✓	✓✓
Avg.	53%	10%	47%	59%	59%	74%	68%	68%	74%	71%	68%	65%	62%	62%	35%	56%	32%

## Integrated Impact Assessment for:

### AV.05 Camberwell

- NSP21: Camberwell Station
- NSP22: Burgess Business Park
- NSP23: Butterfly Walk
- NSP24: Valmar Trading Estate
- NSP25: Camberwell Bus Garage
- NSP26 Walworth Bus Garage, Camberwell
- NSP27 Land Between Camberwell Station Road and Warner Road
- NSP28 Iceland, 120-132 Camberwell Road
- NSP29 49 Lomond Grove
- NSP30 83 Lomond Grove
- NSP31 123 Grove Park
- NSP32 Camberwell Green Magistrates Court
- NSP33 Denmark Hill Campus East

Camberwell Area Vision						
IIA Objective	Description	Area wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	On employment sites the re-provision of at least the equivalent level of employment floorspace or 50% of the sites total development capacity is safeguarded, whichever is greater. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Employment site allocations for the most part seek to improve the provision of small business space to complement the thriving small business, creative and cultural employment clusters in Camberwell which will generate a diverse range of employment opportunities. The transition away from light industrial uses in some cases for example; NSP21, NSP22 and NSP24, could result in the loss of this type of job opportunity, although the anticipated uplift of employment space let as smaller units will attract a variety of different employers and opportunities. Town centre uses and active frontages proposed across many of the sites within the vision area will create a vibrant urban area, including supporting the local health economy. The improvement of transport links and connectivity enhancements, notably the reopening of Camberwell Station, will improve access to employment opportunities and other facilities for all existing and future residents. These enhanced transport connections will become the catalyst for further investment in the area.
IIAO 2	To improve the education and skill of the population	✓	-	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓	-	✓	✓	Enhancement of the low-line walking route, green links and planned cycle networks will promote active lifestyles and help reduce the causes and exposure to poor air quality. Higher density development envisaged will free up space and routes between building plots to improve legibility and promote social interaction. More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant. Improvement of transport links and connectivity enhancements, notably the reopening of Camberwell Station, will improve access to employment opportunities and other facilities for all existing and future residents. These enhanced transport connections will become the catalyst for further investment in the area. The potential for extra care homes provision across the majority of sites within the sub-area recognises the importance of addressing borough-wide needs in a suitable location. NSP33 ('Denmark Hill Campus East', part of the Denmark Hill health cluster) protects the strategic health facilities the site provides and requires that any redevelopment preprovide,

						support and enhance this function. This will ensure access to key health services for local residents, workers and visitors and those from further afield will continue to be provided for the benefit of public health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	Improved permeability and activation of frontages, particularly along the low-line route, will open up spaces to promote social interaction and the feeling of public safety. High quality and inclusive public realm enhancement accessible to all groups will promote an enhanced sense of community.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	x	✓	✓✓	High quality and inclusive public realm enhancements will be accessible to all groups. Low-line, green links and planned cycle ways will create a more legible urban environment to avoid physical barriers and issues of severance. New public spaces and the mix of uses proposed around Camberwell Station will create an impressive transport node and vibrant destination which will draw together a variety of groups, encourage further inward investment and promote social cohesion. Enhanced accessibility offered by the reopening of Camberwell Station and public realm enhancements will improve access to facilities and opportunities for all. There may also be disruptions to local communities from the concentration of largescale redevelopment in a localised area. Camberwell may be particular susceptible to the impacts of this type of disruption given that it includes some of the most deprived areas of the borough, however the long term benefits of redevelopment should be far reaching as demonstrated in the rest of the integrated impact assessment for the vision area and site allocations. Potential loss of the community hall and faith building at NSP27 could result in the loss of an important ethnic community asset but could also facilitate their relocation to a more suitable location. Potential for extra care homes provision across the majority of sites within the sub-area would help ensure development serves all groups.
IIAO 6	To reduce contributions to climate change	✓	?	✓	✓	Low-line, green links, planned cycle ways and significantly the reopening of Camberwell Station will promote active transport and sustainable modes, improving air quality and reducing greenhouse gas emissions. Enhanced green linkages and new public spaces around Camberwell Station will encourage urban greening to adapt to the effects of climate change, reduce the urban heat island effect and increase ecological resilience of the Burgess Park and surrounds core habitat area. Although improved public transport should help to address congestion particularly around the crossroads in Camberwell, CO2 emissions could still be exacerbated by accelerated levels of construction and demolition. NSP policies seek to minimise carbon dioxide emissions from development to offset this impact..
IIAO 7	To improve the air quality	✓	?	✓	✓	Low-line, green links and planned cycle ways will promote active transport modes, helping to address the causes of poor air quality. Air quality in the area suffers as a result of heavy congestion at the crossroads in Camberwell, this could be exacerbated by accelerated levels of construction and demolition. However, transition away from industrial uses proposed at many of the site allocations might improve air quality as well limiting the number of HGV's within the sub-area which should have a positive effect on congestion and emissions. NSP policy requires development to meet air quality neutral standards and improve air quality
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	-	✓	✓✓	Development will be respectful to the designations of conservation areas and strategic viewing corridors where they apply. All existing open space is to be retained whilst new open space proposed around Camberwell Station will encourage urban greening and landscape enhancements. Enhanced high-quality public realm should provide for a much improved

		✓	-	✓	✓	townscape. The increased densities proposed at many of the site allocations will release pockets of space between building plots for public greenspace which will improve the quality of landscape and create a more legible townscape across the sub-area.
I1AO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	Development will be respectful to the designations of conservation areas and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
I1AO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	All existing open space is to be retained whilst new open space is proposed and enhanced green links will encourage urban greening and landscape enhancements. The core habitat area around Burgess Park, green links and living roofs will look to support and enhance biodiversity.
I1AO 14	To reduce vulnerability to flooding	✓	✓	✓	✓	<p>The sites within the area Camberwell vision, vary between the flood zones they are located in, with sites located in all three flood zones.</p> <p>All sites located in flood zone 1 are permitted in terms of flood risk compatibility.</p> <p>Sites falling within flood risk zone 2 and 3 which propose more vulnerable uses have satisfied the exception test through providing wider sustainability benefits, which outweigh the flood risk and provide specific emergency evacuation procedures, flood resilient construction techniques and SuDS to manage the potential flood risks which arise.</p> <p>Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. The majority of the sub-area falls within a Critical Drainage Area and therefore the impact of substantial development falling within this area would need to be closely investigated to ensure they will not significantly increase the risk of flooding elsewhere. Proposals for multiple developments within a concentrated area could be further investigated to assess their cumulative impact and determine whether any strategic measures to manage surface water could be encouraged. NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.</p>
I1AO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	The area vision and site allocations should deliver a significant number of new homes across the area. If these are delivered to policy requirements they will offer a range of different units and tenures which will provide for a range of different needs and create inclusive residential schemes accessible to all groups.
I1AO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	-	✓	✓✓	Camberwell will benefit from significantly improved transport connections, notably the reopening of Camberwell Station. It is anticipated these improvements will reduce reliance upon the private car and provide benefits from excellent public transport connections, supporting the intensification of development. Low-line, green links, planned cycle ways and station access improvements will further promote active transport modes.
I1AO 17	To provide the necessary infrastructure to support existing and future development	✓	-	✓	✓✓	Green links and the planned cycle networks will enhance connectivity across the sub-area. Potential for extra care homes provision across the majority of sites within the sub-area recognises the importance of addressing a local need and ensure development will benefit all groups.

NSP21: Camberwell Station				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	A new station would support further growth. The station area would be transformed into a vibrant cluster of small and medium sized businesses that would make a more intensive use of the railway arches.
			✓✓	Developments on this site must at least retain the quantum of employment space that currently exists on site therefore opportunities for jobs once the station is finished and during the construction period will tackle poverty and encourage wealth creation. A new station will also encourage improved accessibility to opportunities for employment wider areas of the Borough.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
IIAO 3	To improve the health of the population	✓✓	✓✓	The provision of new retail, community or leisure uses (as defined in the glossary) facing Camberwell Station Road will allow staff to gain new skills whilst working in these establishments.
			✓✓	Enhancement of the low-line walking route, green links and planned cycle networks will promote active lifestyles and help reduce the causes and exposure to poor air quality.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	More job opportunities generated by employment space uplift and town centre uses will help reduce poverty as an underlying determinant.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Improved permeability and activation of frontages, will open up spaces enabling natural surveillance of the area to promote social interaction and the feeling of public safety.
			✓✓	High quality and inclusive public realm enhancements will be accessible to all groups. Low-line, will create a more legible urban environment to avoid physical barriers and issues of severance. It is therefore essential that these areas will reap the benefits of redevelopment to reduce the inequality gap.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	The potential provision of community and leisure uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions.
IIAO 7	To improve the air quality	✓✓	✓✓	Low-line, will promote active transport modes, improving air quality and mitigating greenhouse gas emissions
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Low-line, NSP policies requires development to meet air quality neutral standards and improve air quality.
IIAO 9	To encourage sustainable use of water resources	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 11	To protect and enhance quality of landscape and townscape	ü	✓	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	All existing open space is due to be retained . NSP policies require development to be reflective of the existing townscape.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is within the setting of Grade II listed building The Regal Cinema and other Grade II listed buildings on Camberwell New Road. The site is within the setting of the important unlisted Greek Orthodox Cathedral and undesignated heritage asset of the railway viaduct. The site also lies partially within Camberwell Green Conservation Area and is in close proximity of Camberwell New Road Conservation Area Impacts a distinctive Borough View or London View Management Framework View (LVMF). The site is also located in APA3 - Camberwell Village, Tier 2 of the APA Archaeology Priority Zone. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
				The site is in proximity to Camberwell Green (Borough Open Land). All existing open space is due to be retained. They provide the opportunity to create new habitats which will enhance biodiversity and reinforce the aspirations of the ecology restoration zone (River Thames Restoration Zone).

<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The site (SFRA Level II, Analysis 6) passes the sequential test which confirms 'Less Vulnerable' development, mixed use (rail station, employment and town centre uses) is permitted in the Flood Zone 2 with flood defences. When a planning application is submitted on the site, a site-specific FRA will be required to demonstrate that the development will be safe during its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	-	-	The site will not be providing any new homes.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	The site area already benefits from very good public transport connections, supporting the intensification of development. The Low-line, will further promote active transport modes.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The scheme could provide community and leisure facilities for the community at large, this can help to encourage more community interaction and community cohesion.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

<b>NSP22: Burgess Business Park</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. There is the opportunity to deliver new light industrial, distribution and studio/hybrid workspaces.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	The provision of new E(g), B2, B8, retail, community or leisure uses (as defined in the glossary) uses will allow staff to gain new skills whilst working in these establishments.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	The site is in close proximity to Burgess Park which is Metropolitan Open Land, providing opportunities for open space, play and open-air sports facilities, enabling exercise which supports good physical health.
			✓✓	Developments on this site will establish links to Burgess Park enabling good access to public open space which encourages good mental health, through providing public amenity green space.
			✓✓	Developments on this site are required to establish green links into Burgess Park and from Chiswell Street to Newent Close, opening up access for new and existing residents with a new public realm offer throughout the site. This promotes more active modes of transport which is good for both physical and mental health as well as more access to greenery and planting which also encourages good mental health.
			✓✓	Redevelopment on this site will enhance existing and proposed pedestrian and cycle routes including the Southwark Spine and good accessibility to bus stops this will promote active transport modes, which is good for physical and mental health.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	Improved permeability and activation of frontages through the provision of retail, community or leisure uses (as defined in the glossary), will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Provision of a new public square for people to sit and gather will also provide natural surveillance within the area.
			✓✓	High quality and inclusive public realm enhancements and a new public square in close proximity to Burgess Park will be accessible to all groups. The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion

			✓✓	The scheme must provide D uses, these community and leisure facilities provided for the community at large can help to encourage more community interaction and community cohesion.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	Redevelopment on this site will enhance existing and proposed pedestrian and cycle routes including the Southwark Spine and good accessibility to bus stops this will promote active transport modes, improving air quality and mitigating greenhouse gas emissions
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Redevelopment on this site will enhance existing and proposed pedestrian and cycle routes including the Southwark Spine this will promote active transport modes, improving air quality and mitigating greenhouse gas emissions
			✓	NSP policies requires development to meet air quality neutral standards and improve air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	All existing open space is due to be retained. Provision of a new public square will help in enhance the character of the town scape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site contains Grade II listed buildings 73, 75, 77 Southampton Way and other Grade II listed buildings are located on Wells Way and Cottage Green. The site also includes the historic semi-detached townhouse on the corner of Southampton Way and Parkhouse Street. Although the application is not in an APZ, an archaeological assessment is required as site is over 0.5 ha and in accordance with Historic England's 'Greater London Archaeological Priority Area Guidelines' the site should be acknowledged as a Tier 4 APA. Development will be respectful to the designations of conservation areas and listed buildings and designed in a way which seeks to conserve the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓	The site is in proximity to the designated Burgess Park (Metropolitan Open Land and Site of Importance for Nature Conservation). All existing open space is due to be retained.
			✓✓	The site has low ecological value, however the developments that have been granted planning permission will be delivering biodiversity gains through the inclusion of native shrubs
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level II, Analysis 5) will have a "more vulnerable" use mixed use (employment ,residential, town centre and community) in Flood Zone 3 benefitting from defences. Development therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes._The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Redevelopment on this site will enhance existing and proposed pedestrian and cycle routes including the Southwark Spine and good accessibility to bus stops this will promote active transport modes, which is good for physical and mental health.</li> <li>- The creation of new green links will combat severance between communities and encourage community interaction</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus</li> </ul>

				<p>improving air quality and contributing to reduction in greenhouse emissions</p> <ul style="list-style-type: none"> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. Basement dwellings will not be permitted on this site. Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</p> <p>The two approved applications currently on site are for less vulnerable uses. A flood risk assessment (FRA) and addendum was submitted in support of the application at 49-65 Southampton Way, 17/AP/4778 which concludes that the site has a low risk of flooding. The Environment Agency did not raise any issues regarding flood risk. The remainder of the site will be subject to the aforementioned requirements to manage and mitigate flood risks.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home		✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Developments on this site are required to establish green links into Burgess Park and from Chiswell Street to Newent Close, opening up access for new and existing residents with a new public realm offer throughout the site.
			✓✓	Redevelopment on this site will enhance existing and proposed pedestrian and cycle routes including the Southwark Spine and good accessibility to bus stops this will promote active transport modes,
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The scheme could provide D uses on site which could include community and leisure facilities for the community at large, this can help to encourage more community interaction and community cohesion.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP23: Butterfly Walk Morrison's Car Park and Police station				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.
			✓✓	Under NSP policies, development of this nature will secure local jobs and opportunities for local businesses to tender for procurement.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The retention of existing retail uses and the provision of new retail, employment, leisure, arts, culture or community uses this will allow staff to gain new skills whilst working in these establishments.
IIAO 3	To improve the health of the population	✓✓	✓✓	The site through development must provide new east and west green links and new public realm enhancements which will encourage more opportunities for walking and cycling contributing to good physical health and mobility through exercise.
			✓✓	The site is also in close proximity to Camberwell Green (Borough Open land) enabling good access to public open space which encourages good mental health, through providing public amenity green space.
			✓✓	As the site is in close proximity to Camberwell Green, this will provide opportunities for open space, play and open-air sports facilities, enabling exercise which supports good physical health.
			✓✓	More job opportunities generated by commercial uses will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The site will retain Camberwell Green police station which will ensure incidences of crime will be reduced through ensuring a central point is established where people can report any incidents of crime.
			✓✓	The presence of a local police station should deter the fear of crime and act as a deterrent to crime with a police station in close proximity.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
			✓✓	Improved permeability and activation of frontages through the provision of retail uses and potentially employment uses and leisure, arts, culture or community uses will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Provision of a new public square for people to sit and gather will also provide natural surveillance within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	ü✓	ü✓	High quality and inclusive public realm enhancements, and close proximity to Camberwell Green will be accessible to all groups.
			✓✓	The potential provision of leisure, arts, culture or community uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions
			✓✓	Improved permeability and activation of frontages through the provision of retail uses and potentially employment uses and leisure, arts, culture or community uses will open up spaces to promote social interaction
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Redevelopment on this site will enhance existing and proposed pedestrian and cycle routes through improving east and west green links and will ensure good accessibility to bus stops this will promote active transport modes, improving air quality and mitigating greenhouse gas emissions
IIAO 7	To improve the air quality	✓✓	✓✓	Redevelopment on this site will enhance existing and proposed pedestrian and cycle routes through improving east and west green links and will ensure good accessibility to bus stops this will promote active transport modes which will help in improving air quality
			✓	NSP policies requires development to meet air quality neutral standards and improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.

<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	All existing open space is due to be retained and more green links are encouraged
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is in proximity to Grade II listed buildings on Jephson Street and Camberwell Church Street. The site lies partially within the Camberwell Green Conservation Area and is in proximity of Camberwell Grove Conservation Area.). The site is also a Tier 2 Archaeological Priority Area designation. The site is located in APA3 - Camberwell Village. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity to Camberwell Green (Borough Open Land). All existing open space is due to be retained. They provide the opportunity to create new habitats which will enhance biodiversity and reinforce the aspirations of the ecology restoration zone (River Thames Restoration Zone).
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The site (SFRA Level II, Analysis 6) passes the sequential test which confirms 'more vulnerable' development mixed use (employment, residential, town centre & community) is permitted in the Flood Zone 1. A Basement Impact Assessment (BIA) will also be required for any development proposals incorporating new or extended basement areas.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The site allocation encourages the delivery of homes to increase housing supply within the borough. This will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	The site area is in PTAL 6B which indicates it benefits from the best public transport connections, supporting the intensification of development.
			✓	The site also through development must provide new east and west green links and new public realm enhancements which will encourage more opportunities for walking and cycling which will promote more sustainable modes of travel.
			✓	The site could result in the loss of existing car park which will further reduce the ability to travel to the site by car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	ü✓	✓✓	The scheme could provide leisure, arts, culture or community uses on site which could include community and leisure facilities for the community at large; this can help to encourage more community interaction and community cohesion.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP24: Valmer Trading Estate				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new E(g) uses will allow staff to gain new skills whilst working in these establishments
IIAO 3	To improve the health of the population	✓✓	✓✓	The site through development must provide new east-west green link from Denmark Hill to Valmar Road, this will encourage more opportunities for walking and cycling contributing to good physical health and mobility through exercise.
			✓✓	The site which will encourage more opportunities for walking and cycling through the provision of new east-west green link from Denmark Hill to Valmar Road, this will promote exercise through sustainable transport contributing to good mental health.
			✓✓	More job opportunities generated by commercial uses will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Milkwell Yard provides an opportunity to provide improved connectivity for pedestrians. This will promote active transport modes, improving air quality and mitigating greenhouse gas emissions
IIAO 7	To improve the air quality	✓✓	✓✓	Milkwell Yard provides an opportunity to provide improved connectivity for pedestrians. This will promote active transport modes, improving air quality and mitigating greenhouse gas emissions
			✓	NSP policies requires development to meet air quality neutral standards and improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	All existing open space is due to be retained and more green links are encouraged
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site lies partially within the Camberwell Green Conservation Area. The site is also a Tier 2 Archaeological Priority Area designation. The site is located in APA3 - Camberwell Village. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	All existing open space is due to be retained and more green links are encouraged.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The site (SFRA Level II, Analysis 6) passes the sequential test which confirms 'more vulnerable' development mixed use (employment, and residential uses) is permitted in the Flood Zone 1.
			✓	A Basement Impact Assessment (BIA) will also be required for any development proposals incorporating new or extended basement areas.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The site allocation encourages the delivery of homes to increase housing supply within the borough. This will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors

				can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment should create a new walking route between Valmar Road and Denmark Hill to enhance accessibility to the proposed Camberwell Station which will promote more sustainable modes of travel.
			✓✓	The site could result in the loss of existing car park which will further reduce the ability to travel to the site by car.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓	-	No new infrastructure will be provided as part of the development directly
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP25: Camberwell Bus Garage				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.
			✓✓	Under NSP policies, development of this nature will secure local jobs and opportunities for local businesses to tender for procurement.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new E(g) uses and new town centre uses retail, community or leisure uses (as defined in the glossary) will allow staff to gain new skills whilst working in these establishments
IIAO 3	To improve the health of the population	✓✓	✓✓	The site which will encourage more opportunities for walking and cycling through the provision of new east-west green links from Camberwell Station Road to Warner Road will encourage more opportunities for walking and cycling contributing to good physical health and mobility through exercise.
			✓✓	Development on this site will provide a new public square fronting Camberwell Station. This will encourage more opportunities for community cohesion and social interaction which reduces social isolation and loneliness which has positive effects of mental health
			✓✓	The site which will encourage more opportunities for walking and cycling through the provision of new east-west green links from Camberwell Station Road to Warner Road will promote exercise through sustainable transport contributing to good mental health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓	New jobs resulting in the provision of wealth creation could reduce incidences of crime through tackling poverty.
			✓✓	Improved permeability and activation of frontages through the provision of retail uses and potentially employment uses and community or leisure uses (as defined in the glossary) will open up spaces to promote social interaction and the feeling of public safety

			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
			✓✓	A new public square and active frontages will provide natural surveillance helping to reduce the incidences of crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The site must provide a new public square fronting Camberwell Station. This will encourage more opportunities for community cohesion and social interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓	The potential provision of community or leisure uses (as defined in the glossary) uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	The site which will encourage more opportunities for walking and cycling through the provision of new east-west green links from Camberwell Station Road to Warner Road. This will promote active transport modes, improving air quality and mitigating greenhouse gas emissions
IIAO 7	To improve the air quality	✓✓	✓✓	The site which will encourage more opportunities for walking and cycling through the provision of new east-west green links from Camberwell Station Road to Warner Road. This will promote active transport modes, improving air quality and mitigating greenhouse gas emissions
			✓	NSP policies requires development to meet air quality neutral standards and improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	All existing open space is due to be retained, a new public square will be provided and more green links are encouraged. These elements will help soften the landscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site lies between Camberwell Green Conservation Area and Camberwell New Road Conservation Area. The site is within the setting of a number of Grade II Listed buildings on Camberwell New Road, the important unlisted Greek Orthodox Cathedral an undesignated heritage assets including Warner Road mansion blocks. The brick bus garage should also be retained where possible. The site is also a Tier 2 Archaeological Priority Area designation. The site is located in APA3 - Camberwell Village.
				Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which to either conserve or enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	All existing open space is due to be retained and more green links are encouraged. Improving green links contribute to improving green corridors.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The site (SFRA Level II, Analysis 6) passes the sequential test which confirms 'more vulnerable' development mixed use (rail station, employment, residential, community and town centre) is permitted in the Flood Zone 1.
				A Basement Impact Assessment (BIA) will also be required for any development proposals incorporating new or extended basement areas.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The site allocation encourages the delivery of homes to increase housing supply within the borough. This will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is

				encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment should create a new walking route new east-west green links from Camberwell Station Road to Warner Road which will promote more sustainable modes of travel.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The scheme could provide community or leisure uses on site which could include community and leisure facilities for the community at large, this can help to encourage more community interaction and community cohesion.

**NSP26 Abellio Walworth Depot (Walworth Bus Garage, Camberwell)**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	The provision of new E(g) uses and new retail, community or leisure uses will allow staff to gain new skills whilst working in these establishments
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Redevelopment will provide improved walking routes to Camberwell Town Centre including accessibility to cycle routes.
			✓✓	The site will support the Low Line walking route adjacent to the railway viaduct. Encouraging more active modes of transport will promote active lifestyles and mental well-being.
			✓✓	More job opportunities generated by commercial uses will help reduce poverty as an underlying determinant.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓	New jobs may help resulting in the provision of wealth creation which could reduce incidences of crime through tackling poverty.
			✓✓	Improved permeability and activation of frontages through the provision of retail uses and potentially employment and community or leisure uses will open up spaces to promote social interaction and the feeling of public safety
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The provision of community or leisure uses on site will encourage cultural and community uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	Redevelopment will provide improved walking routes to Camberwell Town Centre including accessibility to cycle routes. This will promote active transport modes, improving air quality and mitigating greenhouse gas emissions
			✓✓	The site will support the Low Line walking route adjacent to the railway viaduct. This will promote active transport modes, improving air quality and mitigating greenhouse gas emissions
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Redevelopment will provide improved walking routes to Camberwell Town Centre including accessibility to cycle routes. This will promote active transport modes, improving air quality and mitigating greenhouse gas emissions
			✓✓	The site will support the Low Line walking route adjacent to the railway viaduct. This will promote active transport modes, improving air quality and mitigating greenhouse gas emissions

			✓	NSP policies requires development to meet air quality neutral standards and improve air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	All existing open space is due to be retained, development is required to be in keeping with the townscape
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is within lies between Camberwell Green Conservation Area and Camberwell New Road Conservation Area. The site is within the setting of a number of Grade II Listed buildings on Camberwell New Road, the important unlisted Greek Orthodox Cathedral an undesignated heritage asset including Warner Road mansion blocks. The brick bus garage should also be retained where possible. The site is also a Tier 2 Archaeological Priority Area designation. The site is located in APA3 - Camberwell Village. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity to Camberwell Green (Borough Open Land). All existing open space is due to be retained and more green links are encouraged.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level II, Analysis 6) will have a “more vulnerable’ use mixed use, (bus garage, employment, town centre, community and residential) in Flood Zone 2. The site therefore requires an additional exception test. This would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk.</p> <p>The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- Improved frontages and access to the lowline will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Redevelopment on this site will enhance existing and proposed pedestrian and cycle routes this will promote active transport modes, which is good for physical and mental health</li> <li>- The provision of community or leisure uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions.</li> <li>- .The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul>

				<p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any non-residential development proposals incorporating new or extended basement areas.</p> <p>Basement dwellings will not be permitted on this site. Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The site allocation encourages the delivery of homes to increase housing supply within the borough. This will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment should create a new walking route new east-west green links from Camberwell Station Road to Warner Road which will promote more sustainable modes of travel.
			✓✓	The bus garage will be retained if required, helping to reduce the reliance on cars.
			✓✓	The site will support the Low Line walking route adjacent to the railway viaduct. This will promote active transport modes,
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The scheme could provide community or leisure uses on site which could include community and leisure facilities for the community at large; this can help to encourage more community interaction and community cohesion.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP27 Land Between Camberwell Station Road and Warner Road**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	The provision of new E(g) uses and community uses will allow staff to gain new skills whilst working in these establishments
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Redevelopment will provide improved walking routes to Camberwell Town Centre and links to cycle routes. More active modes of transport will encourage improved physical health
			✓✓	The site will support the Low Line walking route which will encourage improved physical health, resulting in exercise which encourages good mental health.
			✓✓	More job opportunities generated by commercial uses will help reduce poverty as an underlying determinant.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓	New jobs may help resulting in the provision of wealth creation which could reduce incidences of crime through tackling poverty.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The replacement community uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	Redevelopment will provide improved walking routes to Camberwell Town Centre including accessibility to bus stops and links to cycle routes. This will promote active transport modes, improving air quality and mitigating greenhouse gas emissions
			✓✓	Encouraging more active transport modes, will help in improving air quality and mitigating greenhouse gas emissions
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Redevelopment will provide improved walking routes to Camberwell Town Centre including accessibility to bus stops and links to cycle routes. This will promote active transport modes, improving air quality and mitigating greenhouse gas emissions
			✓✓	Encouraging more active transport modes, will help in improving air quality and mitigating greenhouse gas emissions
			✓	NSP policies requires development to meet air quality neutral standards and improve air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use	-	-	New development could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from

	of water resources			development to manage and offset its impact.
<b>IIO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIO 11</b>	To protect and enhance quality of landscape and townscape	-	-	There will not be any loss to existing open space near to the site.
<b>IIO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The site lies partially within the Background Assessment Area of LVMF view 4A.2 - Palace of Westminster from Primrose Hill Summit.</p> <p>Although the site is not in an APZ, as a large site it will require an archaeological assessment is required for this large site.</p> <p>The site will not affect any heritage assets.</p> <p>Development will be respectful to the designations of listed buildings and areas of archaeological significance and designed in a way which seeks to conserve or enhance the setting of historical assets where relevant.</p>
<b>IIO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is not in close proximity to any open spaces or any green corridors. However, developments will be encouraged to incorporate biodiversity measures such as green roofs, bat boxes and sustainable urban drainage where appropriate.
<b>IIO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The site (SFRA Level II, Analysis 6) passes the sequential test which confirms 'more vulnerable' development mixed use (employment, community and residential) is permitted in the Flood Zone 1.</p> <p>A Basement Impact Assessment (BIA) will also be required for any development proposals incorporating new or extended basement areas.</p>
<b>IIO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The site allocation encourages the delivery of homes to increase housing supply within the borough. This will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment will provide improved walking routes to Camberwell Town Centre including accessibility to bus stops and links to cycle routes which will promote more sustainable modes of travel.
			✓✓	The site is in PTAL 5 which already indicates a good level of accessibility to transport.

			✓✓	The site will support the Low Line walking route. This will promote active transport modes,
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The scheme could provide community uses on site which could include community and leisure facilities for the community at large; this can help to encourage more community interaction and community cohesion.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP28 Iceland, 120-132 Camberwell Road				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new retail and community or leisure uses will allow staff to gain new skills whilst working in these establishments
IIAO 3	To improve the health of the population	✓✓	✓✓	Redevelopment will support the low line walking route adjacent to the railway viaduct. More active modes of transport will encourage improved physical health
			✓✓	The site will support the Low Line walking route which will encourage improved physical health, resulting in exercise which encourages good mental health.
			✓✓	More job opportunities generated by commercial uses will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓	New jobs may help resulting in the provision of wealth creation which could reduce incidences of crime through tackling poverty.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
			✓	If site provides retail uses at ground floor facing the station, the activation of frontages through the provision of retail uses will open up spaces to promote social interaction and the feeling of public safety
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The new community and leisure uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Redevelopment will provide improved walking routes through supporting delivery of the Low line, access to the Southwark spine, this helps in improving air quality and mitigating greenhouse gas emissions
			✓✓	Encouraging more active transport modes, will help in improving air quality and mitigating greenhouse gas emissions
IIAO 7	To improve the air quality	✓✓	✓✓	Redevelopment will provide improved walking routes through supporting delivery of the Low line, access to the Southwark spine, this helps to improve air quality.
			✓	NSP policies require development to meet air quality neutral standards and improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.

<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	-	-	There will not be any loss to existing open space near to the site.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The site is within the setting of Grade II Listed buildings and the undesignated heritage assets of the railway viaduct to rear. The site is opposite to the Grade II listed terraces 117-129 and 131-155 Camberwell Road.</p> <p>The site is in proximity to the Addington Square Conservation Area.</p> <p>The site will not affect any heritage assets.</p> <p>Development will be respectful to the designations of listed buildings and areas of archaeological significance and designed in a way which seeks to conserve or enhance the setting of historical assets where relevant.</p>
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is not in close proximity to any open spaces or any green corridors. However, developments will be encouraged to incorporate biodiversity measures such as green roofs, bat boxes and sustainable urban drainage where appropriate.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level II, Analysis 5) will have a “more vulnerable” use mixed use (town centre, community and residential uses) in Flood Zone 3 with defences and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- Improved frontages and access to the lowline will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Redevelopment will support the low line walking route adjacent to the railway viaduct. More active modes of transport will encourage improved physical health</li> <li>- The site will support the Low Line walking route which will encourage improved physical health, resulting in exercise which encourages good mental health.</li> <li>- The potential provision of community or leisure uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions.</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood</p>

				<p>risk elsewhere, and, where possible, reducing flood risk overall. Basement dwellings will not be permitted on this site. Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</p> <p>A Basement Impact Assessment will be separately required for any non-residential development proposals incorporating new or extended basement areas</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The site allocation encourages the delivery of homes to increase housing supply within the borough. This will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment will support delivery of the Low line, access to the Southwark spine, and enhanced access to walking routes. This will encourage more sustainable uses of transport and help discourage car use.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The scheme could provide community or leisure uses on site which could include community and leisure facilities for the community at large; this can help to encourage more community interaction and community cohesion.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP29 49 Lomond Grove

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of E(g) uses will allow staff to gain new skills whilst working in these establishments
IIAO 3	To improve the health of the population	✓✓	✓✓	Redevelopment will provide a new east-west green link from Lomond Grove to Brisbane Street. More active modes of transport will encourage improved physical health
			✓✓	More job opportunities generated by commercial uses will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓	New jobs may help resulting in the provision of wealth creation which could reduce incidences of crime through tackling poverty.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	A more legible urban environment through a new east-west green link from Lomond Grove to Brisbane Street will help prevent physical barriers and issues of severance.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Redevelopment will provide a new east-west green link from Lomond Grove to Brisbane Street. Enabling more active modes of transport through the provision of new green links this will help in reducing carbon emissions through reduced use of private vehicles.
IIAO 7	To improve the air quality	✓✓	✓✓	Redevelopment will provide a new east-west green link from Lomond Grove to Brisbane Street. Enabling more active modes of transport through the provision of new green links can lead help in improving air quality through the reduction of the use of private vehicles which result in carbon emissions.
			✓	NSP policies requires development to meet air quality neutral standards and improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	New development could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality	-	-	There will not be any loss to existing open space near to the site.

	of landscape and townscape			
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	-	-	There are no historical, environmental or archaeological sites in close proximity to the site.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is not in close proximity to any open spaces or any green corridors. However, developments will be encouraged to incorporate biodiversity measures such as green roofs, bat boxes and sustainable urban drainage where appropriate.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level II, Analysis 5) will have a “more vulnerable” use, mixed use (employment and residential) in Flood Zone 3 with defences. The site therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk.</p> <p>The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- Redevelopment will provide a new east-west green link from Lomond Grove to Brisbane Street. More active modes of transport will encourage improved physical health</li> <li>- More job opportunities generated by commercial uses will help reduce poverty as an underlying determinant.</li> <li>- Encouraging more active transport modes, will help in improving air quality and mitigating greenhouse gas emissions</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the SFRA including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. Basement dwellings will not be permitted on this site. Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</p> <p>A Basement Impact Assessment will be separately required for any non-residential development proposals incorporating new or extended basement areas</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The site allocation encourages the delivery of homes to increase housing supply within the borough. This will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement

			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment will support delivery of the Low line, access to the Southwark spine, and enhanced access to walking routes. This will encourage more sustainable uses of transport and help discourage car use.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	-	No new infrastructure will be provided as part of the development directly
			✓	The development would be subject to CIL payments

<b>NSP30 83 Lomond Grove</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	The provision of new E(g) uses will allow staff to gain new skills whilst working in these establishments
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Redevelopment will provide a new east-west green link from Lomond Grove to Brisbane Street. More active modes of transport will encourage improved physical health
			✓✓	More job opportunities generated by commercial uses will help reduce poverty as an underlying determinant.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓	New jobs may help resulting in the provision of wealth creation which could reduce incidences of crime through tackling poverty.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and	✓✓	✓✓	A more legible urban environment through a new east-west green link from Lomond Grove to Brisbane Street will help prevent physical barriers and issues of severance.

	community cohesion		✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	Redevelopment will provide a new east-west green link from Lomond Grove to Brisbane Street. Enabling more active modes of transport through the provision of new green links this will help in reducing carbon emissions through reduced use of private vehicles
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Redevelopment will provide a new east-west green link from Lomond Grove to Brisbane Street. Enabling more active modes of transport through the provision of new green links can lead help in improving air quality through the reduction of the use of private vehicles which result in carbon emissions.
			✓	NSP policies requires development to meet air quality neutral standards and improve air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	New development could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	-	-	There will not be any loss to existing open space near to the site.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is immediately adjacent to Grade II listed buildings at 99, 101 and 103 Lomond Grove.  The site will not harmfully affect any heritage assets.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is not in close proximity to any open spaces or any green corridors. However, developments will be encouraged to incorporate biodiversity measures such as green roofs, bat boxes and sustainable urban drainage where appropriate.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level II, Analysis 5) will have a “more vulnerable’ use, mixed use (employment and residential) in Flood Zone 3 with defences. The site therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows: <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough</li> <li>- Redevelopment will provide a new east-west green link from Lomond Grove to Brisbane Street. More active modes of transport will encourage improved physical health</li> <li>- More job opportunities generated by commercial uses will help reduce poverty as an underlying determinant.</li> </ul>

				<ul style="list-style-type: none"> <li>- Encouraging more active transport modes, will help in improving air quality and mitigating greenhouse gas emissions</li> <li>- .The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the SFRA including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. Basement dwellings will not be permitted on this site. Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</p> <p>A Basement Impact Assessment will be separately required for any non-residential development proposals incorporating new or extended basement areas</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The site allocation encourages the delivery of homes to increase housing supply within the borough. This will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment will support delivery of the Low line, access to the Southwark spine, and enhanced access to walking routes. This will encourage more sustainable uses of transport and help discourage car use.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	-	No new infrastructure will be provided as part of the development directly
			✓	The development would be subject to CIL payment

NSP31 123 Grove Park				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs during the construction phase which will tackle poverty and wealth creation.
IIAO 2	To improve the education and skill of the population	-	-	As the site is solely for new housing there will not be an effect on education and skills as a direct benefit of the development
IIAO 3	To improve the health of the population	✓	✓	The provision of accommodation is a key need for society, having one's own accommodation and space will aid in maintaining one's mental health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓	Reducing homelessness could reduce incidences of crime.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	-	<p>The site was initially a probation centre which means the loss of a community facility.</p> <p>The 123 Grove Park Supplementary Planning Document (SPD) states that the Council is satisfied that the previous managers of the property, namely the National Offending Management Services Estates (NOMS) and Office of Government Commerce (OGC) have demonstrated that the site is surplus to the requirements of all government departments and agencies.</p> <p>In order to satisfy the requirements of saved policy 2.1 'Enhancement of community facilities' in full, the applicant provided marketing information from the agents Collier International who have been marketing the site actively since July 2007.</p> <p>According to this evidence the property has been marketed by a variety of means and consistently over this period. Interested parties for the community or leisure use found the property unsuitable due including the following reasons: location; complexity of the layout; lack of public transport; layout of the floorspace; condition of the building; car parking; and other more suitable buildings located elsewhere</p> <p>In light of the above it is deemed that the loss of the probation centre would not result in a direct negative as the site was surplus to requirements and deemed unsuitable for community or leisure use.</p>
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	-*	-	As the granted development on the site would result in 9 residential dwellings, it would not meet the major application trigger which would require the development to be carbon neutral. As such there are no energy requirements with an application of this size development.

<b>IIAO 7</b>	To improve the air quality	-	-	Impacts of the development have not been found to worsen air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed; however, NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact. No specific measures were included in this development.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	A new large front garden will form part of the proposals; this is a feature which will help in softening and greening the townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and	✓	-	The site is in close proximity to Grade II listed buildings along Camberwell Grove and Grove Park. The site also lies within Camberwell Green Conservation Area.  The development is not deemed to affect any heritage assets.
			✓	The proposal is for the change of use from community use with an ancillary office function to Class C3 for residential use, including conversion and part demolition of existing main house to enable the creation of x5 new residential units and the construction of x4 new residential units in the rear garden with x9 off street parking spaces, associated communal and private landscaped areas.  The policy initially required the retention of the building as is it was deemed to contribute to historical importance of the conservation area. The site was subject to two appeals and the inspector found that the extension and internal changes to the host building would still achieve visual subservience to the host building as such still conserving the historic environment.
			✓✓	The creation of a new large front garden as this is considered to be an important feature of the setting of the building and its position within the wider conservation area.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	x	The proposal would result in the felling of one category B tree T142 (– significant reduction on previous scheme where 7 were felled) and felling of 50 category C trees, 1 category U tree and removal of 6 stumps (reduced from previous scheme). However, the scheme will be subject to a replanting programme to mitigate the loss
			✓✓	The creation of a new large front garden as this is considered to be an important feature of the setting of the building and its position within the wider conservation area.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The site (SFRA Level II, Analysis 7) passes the sequential test which confirms 'more vulnerable' development (residential) is permitted in the Flood Zone 1.  A Basement Impact Assessment (BIA) will also be required for any development proposals incorporating new or extended basement areas.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The site allocation encourages the delivery of homes to increase housing supply within the borough. This will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of

				economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	-	x	This proposed development is located in an area with a TfL PTAL rating of 4, reflecting a medium level of access to all forms of transport. 9 car parking spaces are to be provided and allocated and this includes 1 parking space for disabled users. The parking is to be situated towards the front of the site offset to the east of the proposed town houses and would be accessed via a 5.1m access road.
			✓	18 cycle spaces would be provided in the form of two spaces for each dwelling and would be located just outside of each of the dwellings, ensuring that they are accessible.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	-	No new infrastructure will be provided as part of the development directly.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

<b>NSP32 Camberwell Green Magistrates Court</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	The provision of E(g) and new (retail, community or leisure uses will allow staff to gain new skills whilst working in these establishments
<b>IIAO 3</b>	To improve the health of the population	✓	✓	The plaza area will be re-landscaped to provide enhanced green infrastructure, retaining the existing mature trees, and improved public realm. Access to greenery is proven to have positive effects on mental health and reduces the risk for developing psychiatric disorders and providing a calm, restorative environment.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓	More job opportunities generated by employment space will help reduce poverty which should help reduce the need for crime overall
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.

IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	x	The site is a law centre which means the loss of a community facility.
			✓	The site could provide replacement community or leisure facilities which will could help encourage social inclusion and community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	NSP policies require non-residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon will help reduce our carbon footprint and our contribution to manmade climate change.
IIAO 7	To improve the air quality	✓	✓	NSP policies requires development to meet air quality neutral standards and improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	The plaza area will be re-landscaped to provide enhanced green infrastructure, retaining the existing mature trees, and improved public realm which will provide high-quality public realm which should provide for a much-improved townscape.
IIAO 12	To conserve and enhance the historic environment and	✓	✓	The site is within the setting of the Camberwell Green Conservation Area.
				The site is in proximity to Grade II listed building Camberwell Public Baths. Redevelopment must enhance the setting of important unlisted Peabody Buildings. Development will be respectful to the designations of conservation areas and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The plaza area will be re-landscaped to provide enhanced green infrastructure, retaining the existing mature trees, and improved public realm which will provide high-quality public realm should provide for a much-improved townscape. The site will therefore provide a range of benefits to improve mental health, active lifestyles, recreation, food growing, enhanced biodiversity and ecological resilience.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level II, Analysis 7) will have a "more vulnerable" use mixed use (town centre, community, employment and residential) in Flood Zone 3 with defences and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows: - The redevelopment will provide new homes and create job opportunities during construction to tackle poverty

				<ul style="list-style-type: none"> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The site could provide replacement community or leisure facilities which will could help encourage social inclusion and community cohesion.</li> <li>- More job opportunities generated by commercial uses will help reduce poverty as an underlying determinant.</li> <li>- Encouraging more active transport modes, will help in improving air quality and mitigating greenhouse gas emissions</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape.</li> <li>- The plaza area will be re-landscaped to provide enhanced green infrastructure, retaining the existing mature trees, and improved public realm which will provide high-quality public realm should provide for a much-improved townscape.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the SFRA including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. Basement dwellings will not be permitted on this site. Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</p> <p>A Basement Impact Assessment will be separately required for any non-residential development proposals incorporating new or extended basement areas</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>I1AO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The site allocation encourages the delivery of homes to increase housing supply within the borough. This will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.

<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	The site will be required to provide cycle spaces for the new uses introduced to site which should assist in reducing reliance on cars.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	-	No new infrastructure will be provided as part of the development directly.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

<b>NSP33 Denmark Hill Campus East</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	-	-	The site allocation and granted proposal does not have any effect on the achievement of the objective.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	The provision of new health and education facilities will allow staff to gain develop their skills whilst working in these establishments.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Parts of the site will be redeveloped and intensified to support the functioning of the two hospitals to enhance their services. The site is specifically allocated for health facilities which will help in encouraging healthy lives by tackling the causes of ill health and inequalities.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	-	-	The site allocation and granted proposal does not have any effect on the achievement of the objective.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	-	-	The site allocation and granted proposal does not have any effect on the achievement of the objective.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	The site has the potential to provide new public routes to improve access to Denmark Hill station and Grove Lane should be explored. Encouraging more active transport modes, will help in improving air quality and mitigating greenhouse gas emissions
			✓✓	NSP policies require non-residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon will help reduce our carbon footprint and our contribution to manmade climate change.
<b>IIAO 7</b>	To improve the air quality	✓	✓	NSP policies requires development to meet air quality neutral standards and improve air quality.
			✓✓	The site has the potential to provide new public routes to improve access to Denmark Hill station and Grove Lane should be explored. Encouraging more active transport modes, will help in improving air quality and mitigating greenhouse gas emissions
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	New D1 provision could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, , but soil

	quality of land and soils			quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	-	-	The site is not in close proximity to any open spaces. All existing open space is due to be retained.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site lies within Camberwell Grove Conservation Area. The site contains Grade II listed buildings from Maudsley Hospital which should be protected and enhanced. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	-	-	The site is not in close proximity to any open spaces. All existing open space is due to be retained.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The site (SFRA Level II, Analysis 7) passes the sequential test which confirms 'more vulnerable' development mixed use (health, research and education) is permitted in the Flood Zone 1.  A Basement Impact Assessment (BIA) will also be required for any development proposals incorporating new or extended basement areas.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	-	-	The site will not provide any new housing and will not result in the loss of any existing housing.  The site allocation and granted proposal therefore has no effect on the achievement of the objective.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	-	-	The site allocation and granted proposal therefore has no effect on the achievement of the objective.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site will provide additional health facilities. This will ensure access to key health services for local residents, workers and visitors and those from further afield will continue to be provided for the benefit of public health.

Integrated impact assessment for

**AV06 Crystal Palace and Gipsy Hill**

Including:

NSP34 - Guys and St Thomas Trust Rehabilitation Centre, Crystal Palace

	AV06				NSP34
	Area wide	S	M	L	
IIAO 1	✓	-	✓	✓	✓✓
IIAO 2	-	-	-	-	✓✓
IIAO 3	✓	✓	✓	✓	✓✓
IIAO 4	-	-	-	-	✓✓
IIAO 5	✓	-	✓	✓	✓✓
IIAO 6	✓	-	-	✓	-
IIAO 7	✓	-	-	✓	✓
IIAO 8	-	-	-	-	-
IIAO 9	-	-	-	-	-
IIAO 10	-	-	-	-	-
IIAO 11	✓	✓	✓	✓	✓✓
IIAO 12	✓	✓	✓	✓	✓
IIAO 13	✓✓	✓	✓✓	✓✓	✓✓
IIAO 14	✓	-	✓	✓	✓
IIAO 15	✓	✓	✓	✓	✓✓
IIAO 16	✓	-	✓	✓	✓✓
IIAO 17	✓	✓	✓	✓	✓✓
Avg.	38%	18%	32%	38%	68%

**Integrated Impact Assessment for:**

**AV06 Crystal Palace and Gipsy Hill Area Vision and site allocation NSP34 as follows:**

- NSP34: Guys and St Thomas Trust Rehabilitation Centre, Crystal Palace

Crystal Palace and Gipsy Hill Area Vision						
IIA Objective	Description	Area wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓	-	✓	✓	The area vision for Crystal Palace and Gipsy Hill seeks to prioritise the provision of new homes as well as encouraging small shops and services to complement, and not detract from, the economic function of Upper Norwood town centre. The limited provision of additional employment floorspace envisaged is unlikely to provide a significant uplift in local job opportunities however this is predominantly a residential area with only capacity to accommodate a local service economy.
IIAO 2	To improve the education and skill of the population	-	-	-	-	The lack of employment space or education provision identified is unlikely to significantly improve education or level of skilled workers in Crystal Palace and Gipsy Hill.
IIAO 3	To improve the health of the population	✓	✓	✓	✓	Enhancement of green links and planned cycle networks will promote active lifestyles and help reduce the causes of and exposure to poor air quality. The retention of the health centre at NSP35 will provide primary healthcare services to support the existing and future residential community. The suburban density zone provides significant amounts of open space for leisure and recreation to encourage social interaction and healthy lifestyles. The potential for extra care homes provision across the sites within the sub-area recognises the importance of addressing borough-wide needs in a suitable location and the design guidance for NSP34 recognises the potential for any uplift in floorspace to provide extra care housing.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	-	-	Crystal Palace and Gipsy Hill benefits from relatively low-levels of crime and deprivation.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	-	✓	✓	Levels of poverty and deprivation are low in this more suburban area and so the vision seeks to improve accessibility to housing and widen provision of services supporting the local community. The NSP34 site allocation is reflective of this approach by safeguarding the retention of an important community asset in the health centre. Green links and planned cycle ways will create a more legible urban environment to avoid physical barriers and address issues of severance. The area vision supports improvements to local services to meet local needs, including for school places and GP provision.
IIAO 6	To reduce contributions to climate change	✓	-	-	✓	Green links and planned cycle ways will promote active transport and sustainable modes, improving air quality and reducing greenhouse gas emissions. NSP policies seek to minimise carbon dioxide emissions arising from development.
IIAO 7	To improve the air quality	✓	-	-	✓	Green links and planned cycle ways will promote active transport modes, helping to address the causes of poor air quality. Air quality in the area is generally good benefitting from the lower densities and extensive greenspace. NSP policies requires development to meet air quality neutral

						standards and improve air quality
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	NSP policies will require adequate management of waste arising from construction and intensified development in accordance with the waste management hierarchy. Minor amount of development proposed is unlikely to have a comparatively significant impact upon waste arising from development and demolition.
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	The comparatively minor uplift in employment and residential floorspace envisaged over the course of the plan period in Crystal Palace and Gipsy Hill is unlikely to place significant additional pressures on the water network. Development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	As a predominantly residential suburb, the Crystal Palace and Gipsy Hill area likely benefits from good quality ground conditions. The single site allocation promotes the retention of an already developed site. Any redevelopment to deliver uplift in floorspace may provide opportunities to remediate contaminated land where applicable.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	All existing open space is to be retained and the greenspace of Crystal Palace and Gipsy Hill enhanced by green linkages creating a more legible environment. All development sites will be sensitive to their respective character setting and will seek to enhance the environment they are situated within.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓	✓✓	✓✓	The thriving biodiversity and existing open space of the area is to be retained and the greenspace enhanced by green linkages creating a more legible environment and green corridors to support biodiversity, in particular the ecological resilience of the Dulwich Upper Wood.
IIAO 14	To reduce vulnerability to flooding	-	-	-	-	The minor levels of development anticipated over the course of the plan period in Crystal Palace and Gipsy Hill is unlikely to have a significant impact upon flood risk or increasing the risk of flooding elsewhere. NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓	✓	✓	✓	Whilst development opportunities are relatively limited, Crystal Palace and Gipsy Hill have the potential to contribute towards meeting Southwark's housing need. Most new homes will be built on infill sites. If these are delivered to policy requirements, they will offer a range of different units and tenures which will provide for a range of different needs and create inclusive residential schemes accessible to all groups.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	-	✓	✓	Priority of walking, cycling through green links and planned cycle ways, as well as public transport, will reduce pressure on car parking and improve accessibility, thus reducing reliance on the private car.
IIAO 17	To provide the necessary infrastructure to	ü	✓	✓	✓	The NSP34 site allocation is reflective of an approach to safeguard the retention of existing community by recognising the health centre's vital contribution in providing an important local asset

	support existing and future development					to support the local community. Enhanced green links and planned cycle networks will reduce pressure on car parking and improve accessibility. Potential for extra care homes provision recognises the importance of addressing a local need and ensure development will benefit all groups.
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NSP34 – Guys and St Thomas Trust Rehabilitation Centre, Crystal Palace				
IIA Objective	Description	Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Whilst retaining the existing use of health community, the site's potential of housing provision will be unlocked. Under NSP policies, developer contributions and commitments including affordable housing provision, employment and infrastructure support will be secured to provide regeneration benefits to the wider area and thus encourage wealth creation and reduce poverty.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Skills in construction will be developed in the involved in the development. The re-provision of a rehabilitation centre is expected to offer relevant training to the users
IIAO 3	To improve the health of the population	✓✓	✓✓	The existing rehabilitation health facility use will be retained to continue to meet need. Alternatively, a health facility of at least equivalent size should be provided given there is an evidenced need for such a facility.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The development management process will ensure a good design of any building delivered on site and will consider its relation to the surrounding context, which will address the perception of safety in the area.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The retained rehabilitation centre or the alternative health facility will be open for all residents of different backgrounds. Besides, the affordable housing policy ensure that new residential units on site will be comprised of a mix of tenure and house sizes, with the aim to provide housing needs of a diverse community on different incomes and backgrounds.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	-	-	Although demand for building materials and construction waste will be generated with redevelopment, NSP policy P69 will ensure that the development achieves a minimum carbon emissions reduction of 40%, with any required offset to be contributed to the carbon offset fund and spent on carbon reduction measures elsewhere in the borough.
IIAO 7	To improve the air quality	✓	✓	The site is adjacent to the Crystal Place arches, which will be enhanced by the redevelopment in term of the setting. It will contribute to improved walkability, and in turn encourage active ways to travel and improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Whilst substantial demolition will create new waste demands to be managed, the NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	The site has been previously developed, which offers a regeneration opportunity to remediate contaminated land, but soil quality is unlikely to significantly improve.
IIAO 11	To protect and enhance quality of landscape and townscape	ü✓	ü✓	Given the context of the raised roads bordering the site, there is the potential to develop the site at a higher density than existing, without harming the amenity of surrounding properties. The design and massing of the development will be carefully considered to fit well into the local context in the development management process. Additionally, the mature trees which line the perimeter of the site on the east and west boundary will be required to be retained, which will provide a visual screen for the new development. All these measures combined ensure the development to respect the local character, heritage and townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The Crystal Place arches, adjacent to the site, are an undesigned heritage asset with a Grade II listed pedestrian subway under Crystal Palace Parade to the north east of the site. Development should contribute towards enhancing the subway, and enhancing the setting the setting of the subway. This is to ensure the development will respect the local character and heritage, and enhance the setting of historical assets.

IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The mature trees which line the perimeter of the site on the east and west boundary will be retained. The accessibility to the large open spaces, including Dulwich Upper Wood and Crystal Palace Park, will also promote the public appreciation of the green infrastructure. Additionally, the NSP policies ensure new demand for infrastructure generated from redevelopment will be mitigated through developers' obligations, one of which including the provision and protection of open space.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The site (in SFRA Level 2 - Analysis 9) passes the sequential test which confirms 'More Vulnerable' development (mixed use including health centre, and residential) is permitted in the Flood Zone 1.</p> <p>For any development proposals on site, recommendations are also set out in the report to manage surface water flood risk coming with the constrained sewer capacity under higher return period events, including SuDS to restrict post-development runoff to greenfield rates.</p> <p>When a planning application is submitted on the site, a site-specific FRA will be required to demonstrate that the development will be safe during its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.</p> <p>Basement dwellings are permitted in Flood Zone 1. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The site allocation encourages the delivery of homes to increase housing supply within the borough. This will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Through enhancing the pedestrian subway, the site requirements will effectively promote walking and reduce the reliance on private vehicles.
IIAO 17	To provide the necessary infrastructure to support existing and future development		✓✓	The retained rehabilitation facility, alongside any potential new residential provision, will not only benefit the future occupiers but also provide the wider community in the area with benefits of the regeneration opportunity.
		✓✓	✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**AV.07 Dulwich Area Vision**

**Dulwich Area Vision and site allocation NSP36 as follows:**

- NSP35: The Grove Tavern, 520 Lordship Lane

	AV.07				NSP35:
	Area wide	S	M	L	
IIAO 1	✓	-	✓	✓	✓✓
IIAO 2	✓	-	✓	✓	✓✓
IIAO 3	✓	?	✓	✓	✓✓
IIAO 4	✓	✓	✓	✓	✓✓
IIAO 5	✓	-	✓	✓	✓✓
IIAO 6	✓	-	-	✓	✓
IIAO 7	✓	-	-	✓	✓
IIAO 8	-	-	-	-	-
IIAO 9	-	-	-	-	-
IIAO 10	-	-	-	-	-
IIAO 11	✓	✓	✓	✓	✓
IIAO 12	✓	✓	✓	✓	✓
IIAO 13	✓✓	✓	✓✓	✓✓	✓✓
IIAO 14	✓	✓	✓	✓	✓
IIAO 15	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 16	✓	-	✓	✓	-
IIAO 17	✓	✓	✓	✓	✓✓
Avg.	47%	25%	41%	47%	62%

## Integrated Impact Assessment for:

### Dulwich Area Vision as follows:

- NSP35: The Grove Tavern, 520 Lordship Lane

Dulwich Area Vision						
IIA Objective	Description	Area wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓	-	✓	✓	The area vision for Dulwich seeks to prioritise the provision of new homes as well as encouraging small shops and services to complement and improve Dulwich's shopping centres. The site allocation requires that redevelopment of the site must retain a pub of equivalent floorspace, but should a public house no longer be viable at the site, that at least an equivalent amount of ground floorspace must be provided which may include retail, community or leisure uses or employment uses (E(g)). The limited provision of additional employment floorspace is unlikely to provide a significant uplift in local job opportunities however there is not such a vital need in this prosperous residential area and largely only capacity to accommodate a local service economy.
IIAO 2	To improve the education and skill of the population	✓	-	-	-	Should the public house no longer be viable the site will provide retail, community or leisure uses. These institutions can equip workers within them with their associated skills. Community uses could include training facilities which will also be equip the users with improved skills.
IIAO 3	To improve the health of the population	✓	?	✓	✓	The site could accommodate community which could include health facilities which would make a positive contribution to the local community in providing accessible health services. Design requirements stipulate that development should be set back from the busy south circular road due to poor air quality in the area and any development should be designed to mitigate its impacts. This development will contribute to providing improvements in the area in terms of commercial, community and residential uses which does not contribute to air pollution which can have harmful impacts on the health of the population in the long term
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	Dulwich benefits from low-levels of crime and deprivation. Improved permeability and activation of frontages in Dulwich Village and Lordship Lane will promote social interaction and the feeling of public safety.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	-	✓	✓	Levels of poverty and deprivation are low in this more suburban area and so the vision seeks to improve accessibility to housing and widen provision of services supporting the local community. The site allocation of NSP35 is reflective of this approach by safeguarding the retention of existing community assets in the Grove Tavern Public House.
IIAO 6	To reduce contributions to climate change	✓	-	-	✓	NSP policies seek to minimise carbon dioxide emissions arising from development.
IIAO 7	To improve the air quality	✓	-	-	✓	Air quality in the area is generally good benefitting from the lower densities and extensive greenspace. However NSP35 has identified that the air quality along the South Circular (A205), which the site allocation is located adjacent to, is poor. The site allocation specified that this should be addressed and mitigated through any redevelopment of the site. NSP policies requires

						development to meet air quality neutral standards and improve air quality
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	NSP policies require adequate management of waste arising from construction and intensified development in accordance with the waste management hierarchy. Minor amount of development proposed is unlikely to have a comparatively significant impact upon waste arising from development and demolition.
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	The comparatively minor uplift in employment and residential floorspace is unlikely to place significant additional pressures on the water network. Development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	As a predominantly low density residential suburb Dulwich likely benefits from good quality ground conditions. All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land where applicable.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	Development will be respectful to the designations of conservation areas and listed buildings where they apply. All existing open space is to be retained and the greenspace of Dulwich enhanced by green linkages creating a more legible environment. All development sites will be sensitive to their respective character setting and will seek to enhance the environment they are situated within. Development at NSP35 should carefully consider the sites relation to and setting of Dulwich Park.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓	✓✓	✓✓	The thriving biodiversity and existing open space of Dulwich is to be retained and the greenspace of Dulwich enhanced by green linkages creating a more legible environment and green corridors to support biodiversity, in particular the ecological resilience of the Great North Wood – centred around Dulwich core habitat area.
IIAO 14	To reduce vulnerability to flooding	✓	✓	✓	✓	The Dulwich area is located predominantly in Flood Zone 1 although is located in critical drainage areas. As the NSP 35 is located in flood zone more vulnerable uses can be permitted on site without the need for an exception test. A basement Impact assessment will be separately required for any development proposals incorporating new or extended basement areas.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	Whilst development opportunities in Dulwich are relatively limited, Dulwich has the potential to contribute towards meeting Southwark's housing need. Most new homes will be built on infill sites. If these are delivered to policy requirements they will offer a range of different units and tenures which will provide for a range of different needs and create inclusive residential schemes accessible to all groups.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	-	✓	✓	NSP policies prioritise walking, cycling through green links and planned cycle ways, as well as public transport, will reduce pressure on car parking and improve accessibility, thus reducing reliance on the private car.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓	✓	The site allocation of NSP35 seeks to safeguard the retention of existing community assets in the Grove Tavern Public House. This will help retain and provide important local assets part of the area's social infrastructure to support the local community. The scheme could provide community

						and leisure uses which can service the surrounding community, which could help to encourage more community interaction and community cohesion.
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NSP35: The Grove Tavern, 520 Lordship Lane

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site can provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The potential provision of new retail, office and community will allow staff to gain new skills whilst working in these establishments.
IIAO 3	To improve the health of the population	✓✓	✓✓	Development should be set back from the busy south circular road and reflect both the open, green aspect of the neighbouring Lordship Lane Estate and the prevailing density of the surrounding area. Air quality is poor along the south circular road, and any development should be designed to mitigate its impacts.
			✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The activation of frontages, will open up spaces enabling natural surveillance of the area to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	The potential provision of community uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions.
			✓✓	Retaining the pub where required allows opportunities for community gatherings and social inclusion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓	-	The site allocation does not have a specific direct impact on the objective.
			✓	NSP policies seek to minimise carbon dioxide emissions arising from development.
IIAO 7	To improve the air quality	✓	✓	Development will be set back from the busy south circular road and reflect both the open, green aspect of the neighbouring Lordship Lane Estate and the prevailing density of the surrounding area. Air quality is poor along the south circular road, and development will be designed to mitigate its impacts.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Redevelopment of the site to provide housing and an uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	The site is in proximity to Dulwich Park (Site of Importance for Nature Conservation and Metropolitan Open Land); Barclay Way, Dulwich Common Allotments and Tennis Club; Dulwich Common Sports Ground and Cricket Club, Cox's Walk and St Peter's Churchyard, Lordship Lane (Metropolitan Open Land). All existing open space is due to be retained .
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site lies within Dulwich Wood Conservation Area. The site is within the setting of Grade II listed St Peter's Church and parish hall and Dulwich War Memorial. Tier 2 APA designation. The site is located in APA 6 – Lordship Lane Burial Mound. Historic maps show a barrow (burial mound) of unknown date was once located on this site. In the 18th century the area was part of Dulwich Wells.  Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open	✓✓	✓✓	Development should reflect both the open, green aspect of the neighbouring Lordship Lane which will allow opportunities to enhance biodiversity

	spaces, green corridors and biodiversity			and ecological resilience.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The site (SFRA Level II, Analysis 8) passes the sequential test which confirms 'more vulnerable' development (mixed use including employment, town centre, community and residential use) is permitted in the Flood Zone 1. A basement Impact assessment will be separately required for any development proposals incorporating new or extended basement areas.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	-	-	The site allocation does not have a direct impact on this objective specifically.
			✓	NSP policies require housing and non residential development to be supported by cycle storage. This is to encourage more sustainable transport and reduce the need to travel by car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The scheme could provide community uses on site which could include community and leisure facilities for the community at large, this can help to encourage more community interaction and community cohesion.

**AV.08 East Dulwich**

**East Dulwich Area Vision and site allocations NSP37 – NSP41 as follows:**

- NSP36: Kwik Fit and Gibbs and Dandy, Grove Vale
- NSP37: Dulwich Hamlet Champion Hill Stadium, Dog Kennel Hill
- NSP38: Railway Rise, East Dulwich
- NSP39: Dulwich Community Hospital, East Dulwich Grove
- NSP40: Goose Green Trading Estate

	AV.08				NSP36:	NSP37:	NSP38:	NSP39	NSP40
	Area wide	S	M	L					
IIAO 1	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 2	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 3	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓
IIAO 4	-	-	-	-	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 5	✓	-	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 6	✓	-	-	✓	✓	✓	✓✓	✓	✓
IIAO 7	✓	-	-	✓	✓	✓	✓	✓	✓
IIAO 8	-	-	-	-	-	-	-	-	-
IIAO 9	-	-	-	-	-	-	-	-	-
IIAO 10	-	-	-	-	-	-	-	-	-
IIAO 11	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 12	✓	-	✓	✓	✓✓	✓✓	✓	?	✓
IIAO 13	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 14	✓	-	✓	✓	✓	✓	✓	✓	✓
IIAO 15	✓	✓	✓	✓	✓✓	✓✓	✓✓	-	✓✓
IIAO 16	✓	-	✓	✓	✓	✓✓	?	✓	-
IIAO 17	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓
Avg.	47%	20%	41%	47%	65%	68%	59%	56%	53%

## Integrated Impact Assessment for:

### East Dulwich Area Vision and site allocations NSP37 – NSP41 as follows:

- NSP36: Kwik Fit and Gibbs and Dandy, Grove Vale
- NSP37: Dulwich Hamlet Champion Hill Stadium, Dog Kennel Hill
- NSP38: Railway Rise, East Dulwich
- NSP39: Dulwich Community Hospital, East Dulwich Grove
- NSP40: Goose Green Trading Estate

East Dulwich Area Vision						
IIA Objective	Description	East Dulwich	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	✓	✓	The area vision for East Dulwich seeks to prioritise the provision of new homes as well as encouraging small shops to complement and improve the employment opportunities and service provision along Lordship Lane, Grove Vale and Forest Hill Road. A wider provision of employment uses will be sensitive to the surrounding residential neighbourhoods.
IIAO 2	To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	Provision of a new secondary school on the site of East Dulwich Community Hospital (NSP40) will create a more skilled and educated population delivering improved job opportunities and routes into work.
IIAO 3	To improve the health of the population	✓✓	✓	✓✓	✓✓	Enhancement of green links and planned cycle networks will promote active lifestyles and help reduce the causes and exposure to poor air quality. The proposed delivery of a new health centre at the East Dulwich Community Hospital site (NSP40) will provide vital health provision to support the existing and future residential community of East Dulwich. The suburban density zone provides significant amounts of open space for leisure and recreation to encourage social interaction and healthy lifestyles. Improved accessibility to greenspace surrounding NSP37 will improve access to this recreation and leisure provision. More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant. The potential for extra care homes provision across the majority of sites within the sub-area recognises the importance of addressing borough-wide needs in a suitable location.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	-	-	Dulwich benefits from low-levels of crime and deprivation. Improved permeability and activation of frontages along Lordship Lane, Grove Vale and Denmark Hill Road will promote social interaction and the feeling of public safety.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	-	✓	✓	Levels of poverty and deprivation are low in this more suburban area with the vision seeking to improve accessibility to housing and widen provision of services supporting the local community. Many of the site allocations are reflective of this approach, including the proposed provision of a new school and health centre (NSP40) providing an important function to support a healthy residential community and access to services for all. Green links and planned cycle ways will create a more legible urban environment to avoid physical barriers and address issues of

						severance. Potential for extra care homes provision across the majority of sites within the sub-area would help ensure development serves all groups.
IIAO 6	To reduce contributions to climate change	✓	-	-	✓	Green links and planned cycle ways will promote active transport and sustainable modes, improving air quality and reducing greenhouse gas emissions. Enhanced green linkages will increase ecological resilience of the Great North Wood – centred around Dulwich core habitat area. Dulwich benefits from substantial existing greenspace which mitigate the effects of climate change and urban heat island effect. Priority of walking, cycling and public transport should reduce pressure on car parking and improve accessibility, however use of the private car is still likely to be high and increased delivery of housing may place pressures on public transport and generate additional traffic in the area. NSP policies seek to minimise carbon dioxide emissions arising from development to offset this impact.
IIAO 7	To improve the air quality	✓	-	-	✓	Green links and planned cycle ways will promote active transport modes, helping to address the causes of poor air quality. Air quality in the area is generally good benefitting from the lower densities and extensive greenspace. NSP policies requires development to meet air quality neutral standards and improve air quality Priority of walking, cycling and public transport will reduce pressure on car parking and improve accessibility, thus reducing reliance on the private car.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	NSP policies require adequate management of waste arising from construction and intensified development in accordance with the waste management hierarchy. Some of the site allocations within East Dulwich (NSP36 and NSP40) indicate the potential retention and reuse of existing buildings, limiting the need for demolition and waste.
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	The comparatively low uplift in employment and residential floorspace may place some minor additional pressures on the water network. Development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use, along with water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	As a predominantly low density residential suburb East Dulwich likely benefits from good quality ground conditions. All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land where applicable.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	Development will be respectful to the designations of conservation areas where they apply. Existing open space is to be retained and the greenspace of Dulwich enhanced by green linkages creating a more legible environment. All development sites will be sensitive to their respective character setting and will seek to enhance the environment they are situated within. Proposals at NSP37 should sensitively consider how the development will relate to and enhance the surrounding greenspace.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	ü	✓	✓	✓	The thriving biodiversity and existing open space of East Dulwich will be enhanced by green linkages creating a more legible environment and green corridors to support biodiversity, in particular the ecological resilience of the Great North Wood – centred around Dulwich core habitat

						area.
IIAO 14	To reduce vulnerability to flooding	✓	-	✓	✓	<p>All sites located in flood zone 1 are permitted in terms of flood risk vulnerability and compatibility.</p> <p>Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures. The sub-area falls within Critical Drainage Area however the comparatively minor level of development anticipated in East Dulwich is unlikely to have a significant impact upon flood risk or increasing the risk of flooding elsewhere. NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓	✓	✓	✓	<p>Whilst development opportunities in East Dulwich are relatively limited, the area has the potential to contribute towards meeting Southwark's housing need. If these are delivered to policy requirements they will offer a range of different units and tenures which will provide for a range of different needs and create inclusive residential schemes accessible to all groups. Potential for extra care homes provision across the majority of sites within the sub-area recognises the importance of addressing a local need and ensure development will benefit all groups.</p>
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	-	✓	✓	<p>Priority of walking, cycling through green links and planned cycle ways, as well as public transport, will reduce pressure on car parking and improve accessibility, thus reducing reliance on the private car.</p>
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	<p>The proposed delivery of a new secondary school and health centre at the East Dulwich Community Hospital site (NSP40) will significantly improve social infrastructure provision for the benefit of existing and future residents. Green links and the planned cycle networks will enhance connectivity across the sub-area. Potential for extra care homes provision across the majority of sites within the sub-area recognises the importance of addressing a local need and ensure development will benefit all groups.</p>

NSP36: Kwik Fit and Gibbs and Dandy, Grove Vale

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished, and during the construction will address poverty and encourage wealth creation.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new retail, community or leisure uses compatible with residential uses will allow staff to gain new skills whilst working in these establishments.
IIAO 3	To improve the health of the population	✓✓	✓✓	The site will provide a new green link from Grove Vale to Besant Place. This link will promote more active modes of transport which is good for both physical and mental health as well as more access to greenery and planting which also encourages good mental health. Only employment uses which will not harm the amenity of residential properties will be supported on site meaning that existing and new residents will not be harmed by excessive noise, odour, or other contributors to poor amenity.
			✓✓	More job opportunities generated by activation of ground floor frontages with employment space uplift and town centre uses will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The activation of frontages will open up spaces enabling natural surveillance of the area to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The potential provision of community uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion.
			✓	The site will improve connectivity for cyclists and pedestrians by providing a new green link from Grove Vale to Besant Place. Improved permeability across the site will help combat severance between communities and encourage community interaction.
IIAO 6	To reduce contributions to climate change	✓	✓	The site will provide a new green link from Grove Vale to Besant Place. This can help to provide temperature regulation and improved air quality through more active modes of transport.
IIAO 7	To improve the air quality	✓	✓	The site will provide a new green link from Grove Vale to Besant Place. This can help to provide temperature regulation and improved air quality through more active modes of transport.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network, but development comes with the potential for water-recycling and sustainable water measures when development is in operation. NSP policies require reductions in water use, along with water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	Development should respond positively to maintaining established building lines on Grove Vale.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	The site is within the setting of Grade II listed Goose Green School. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.

IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	A new green link from Grove Vale to Besant Place, which will help to enhance biodiversity and ecological resilience.
			✓	Site is in proximity to Dulwich Park (Site of Importance for Nature Conservation and Metropolitan Open Land); Barclay Way, Dulwich Common Allotments and Tennis Club; Dulwich Common Sports Ground and Cricket Club, Cox's Walk and St Peter's Churchyard, Lordship Lane (Metropolitan Open Land). All existing open space is due to be retained.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The site (SFRA Level II, Analysis 10) passes the sequential test which confirms 'more vulnerable' development (mixed use including employment and town centre, community, and residential uses) is permitted in the Flood Zone 1.</p> <p>The SFRA also makes the following recommendations to reduce vulnerability to flooding.</p> <ul style="list-style-type: none"> <li>• A site specific FRA is required for development sites greater than 1ha in Flood Zone 1.</li> <li>• All uses are acceptable in Flood Zone 1.</li> <li>• The sites are located within a Critical Drainage Area and therefore robust surface water management will be critical.</li> <li>• Sewer capacity within Southwark is known to be constrained under higher return period events.</li> <li>• SuDS should be implemented to manage surface water flood risk and restrict post-development runoff to greenfield rates. Geological data suggests that some of the sites are potentially suitable for infiltration SuDS; whilst for others significant constraints are present. SuDS selection and design should be in accordance with the sustainable drainage hierarchy and provide sufficient capacity to cater for up to the 1 in 100 year storm event, incorporating the latest guidance regarding climate change. Proposals for infiltration SuDS should be supported by site-specific permeability testing.</li> <li>• Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</li> <li>• Any development proposals incorporating new or extended basement areas must be accompanied by a Basement Impact Assessment, demonstrating that the development will be safe from a flood risk perspective and will not have any adverse impacts on local hydrogeology.</li> </ul>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	The site area already benefits from very good public transport connections, supporting the intensification of development. The Low-line, will further promote active transport modes.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could provide community uses which could include leisure facilities such as cinemas, swimming baths and gyms or community facilities like places of worship or health services, these are all important in encouraging community interaction and active, healthy lifestyles.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP37: Dulwich Hamlet Champion Hill Stadium, Dog Kennel Hill**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished, and during the construction will address poverty and encourage wealth creation.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	The provision of new ancillary sports facilities will help to improve skills in relation to sporting and activities such physical education.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Proposals must ensure that the football grounds continue to function successfully. The retention of the football ground and ancillary facilities and sport will enable opportunities for physical activities such as football and other sports related activities which will encourage good physical health.
			✓✓	Enabling residents to participate in sporting activities also helps to encourage good mental health.
			✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	Redevelopment should complement the setting of existing open spaces, and enhance walking and cycling routes and connectivity to Lordship Lane and East Dulwich. This promotes more active modes of transport which is good for both physical and mental health.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The retention and provision of sports facilities (F2(c)) uses can help to encourage group sports and community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	Redevelopment will be encouraged to promote the setting of existing open spaces, and enhance walking and cycling routes and connectivity to Lordship Lane and East Dulwich. This promotes more active modes of transport which will help reduce reliance on cars and improve the environment and reduce contributions to climate change.
<b>IIAO 7</b>	To improve the air quality	✓	✓	The enhancement of walking and cycling routes, along with improved connectivity to Lordship Lane and East Dulwich can help to provide better air quality. Through the increase in active modes of transport and less use of cars, emissions affecting the air quality will reduce.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	✓	✓	NSP policies require reductions in water use, along with water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land. But soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Not an area of Archaeological Priority but the site is over 0.5 ha and should be acknowledged as a tier 4 designation within the APA tier system under Historic England's 'Greater London Archaeological Priority Area Guidelines' so should be assessed for archaeological significance.

				Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	<p>The site contains Dulwich Hamlet (Other Open Space). The site is in proximity to St Francis Park (Other Open Space); Grove Park Cutting (Borough Open Land and Site of Importance for Nature Conservation); Greendale Astro Pitch (Metropolitan Open Land); Greendale Playing Fields (Metropolitan Open Land and Site of Importance for Nature Conservation); Charter School (Metropolitan Open Land); And Dog Kennel Hill Wood (Metropolitan Open Land and Site of Importance for Nature Conservation).</p> <p>The redevelopment of the site could result in additional green infrastructure for sporting activities indirectly help soften the townscape. Redevelopment should complement the setting of existing open spaces.</p>
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The site (SFRA Level II, Analysis 10) passes the sequential test which confirms 'more vulnerable' development (mixed use including open space and residential use) is permitted in the Flood Zone 1.</p> <p>The SFRA also makes the following recommendations to reduce vulnerability to flooding.</p> <ul style="list-style-type: none"> <li>• A site specific FRA is required for development sites greater than 1ha in Flood Zone 1.</li> <li>• All uses are acceptable in Flood Zone 1.</li> <li>• The sites are located within a Critical Drainage Area and therefore robust surface water management will be critical.</li> <li>• Sewer capacity within Southwark is known to be constrained under higher return period events.</li> <li>• SuDS should be implemented to manage surface water flood risk and restrict post-development runoff to greenfield rates. Geological data suggests that some of the sites are potentially suitable for infiltration SuDS; whilst for others significant constraints are present. SuDS selection and design should be in accordance with the sustainable drainage hierarchy and provide sufficient capacity to cater for up to the 1 in 100 year storm event, incorporating the latest guidance regarding climate change. Proposals for infiltration SuDS should be supported by site-specific permeability testing.</li> <li>• Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</li> <li>• Any development proposals incorporating new or extended basement areas must be accompanied by a Basement Impact Assessment, demonstrating that the development will be safe from a flood risk perspective and will not have any adverse impacts on local hydrogeology.</li> </ul>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	<p>Redevelopment should complement the setting of existing open spaces, enhance walking and cycling routes, and connectivity to Lordship Lane and East Dulwich.</p> <p>This promotes more active modes of transport which will help reduce reliance on cars.</p>
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The retention of a football pitch and the provision of new sports facilities will provide Community facilities that will ensure that everyone has access to sports facilities. This will promote healthier lifestyles by enabling people to meet their needs for health, leisure, training, and general community provision.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy

				which will deliver the required infrastructure to mitigate impact of the development.
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NSP38: Railway Rise, East Dulwich				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished, and during the construction will address poverty and encourage wealth creation. The requirement to match the existing amount of employment floorspace on site will ensure that no employment space is lost during or after development.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The re-provision of office and industrial floorspace on site will ensure that new staff can gain skills whilst working in these establishments.
IIAO 3	To improve the health of the population	✓	✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant. The uses listed in the site requirements can be carried out in a residential area without detriment to its amenity which will protect the health of local residents.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Redevelopment on the site will need to provide a habitat buffer to the adjacent green corridor along the railway line. This will aid temperature regulation which will contribute to addressing climate change.
IIAO 7	To improve the air quality	✓	✓	Redevelopment on the site will need to provide a habitat buffer to the adjacent green corridor along the railway line. This will help with improved air and water quality as a piece of green infrastructure.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use, along with water quality improvement from development managed and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	Redevelopment on the site will need to provide a habitat buffer to the adjacent green corridor along the railway line this will result in enhanced green infrastructure which will help soften the townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is within the setting of East Dulwich Community Hospital. The site is also in proximity to Grove Park Cutting (Borough Open Land and Site of Importance for Nature Conservation).  Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance. The development is to be designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	Redevelopment will need to protect and complement the setting of existing open spaces.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The site (SFRA Level II, Analysis 10) passes the sequential test which confirms 'more vulnerable' development (mixed use including employment and residential use) is permitted in the Flood Zone 1.  The SFRA also makes the following recommendations to reduce vulnerability to flooding. <ul style="list-style-type: none"> <li>• A site specific FRA is required for development sites greater than 1ha in Flood Zone 1.</li> <li>• All uses are acceptable in Flood Zone 1.</li> <li>• The sites are located within a Critical Drainage Area and therefore robust surface water management will be critical.</li> </ul>

				<ul style="list-style-type: none"> <li>• Sewer capacity within Southwark is known to be constrained under higher return period events.</li> <li>• SuDS should be implemented to manage surface water flood risk and restrict post-development runoff to greenfield rates. Geological data suggests that some of the sites are potentially suitable for infiltration SuDS; whilst for others significant constraints are present. SuDS selection and design should be in accordance with the sustainable drainage hierarchy and provide sufficient capacity to cater for up to the 1 in 100 year storm event, incorporating the latest guidance regarding climate change. Proposals for infiltration SuDS should be supported by site-specific permeability testing.</li> <li>• Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</li> <li>• Any development proposals incorporating new or extended basement areas must be accompanied by a Basement Impact Assessment, demonstrating that the development will be safe from a flood risk perspective and will not have any adverse impacts on local hydrogeology.</li> </ul>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	?	?	The site could provide low line walking routes by the railway. This promotes more active modes of transport which will help reduce reliance on cars.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP39: Dulwich Community Hospital, East Dulwich Grove**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished, and during the construction will address poverty and encourage wealth creation.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	The provision of a new secondary school (F1(a) use class) would help with improving the skills of the younger residents leading to a more skilled and educated population.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	The provision of a new health facility (E(e) use class) will provide support to residents in helping to lead healthy lives by providing support for good mental and physical health.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	-	-	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓	✓	The provision of a secondary school will enable children and their parents to work towards a common goal: an education. The school will allow people from different backgrounds who live locally to interact together which will encourage community cohesion.
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	NSP policies require non-residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon. Which will help demonstrate the move towards a reduction in our carbon footprint and contribution to alleviating climate change through new exemplary buildings in the borough.
<b>IIAO 7</b>	To improve the air quality	✓	✓	NSP policy requires development to meet air quality neutral standards and improve air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use, along with water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	The site is in proximity to Grove Park Cutting (Borough Open Land and Site of Importance for Nature Conservation). Redevelopment should complement the setting of existing open spaces.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	?	?	The site includes remains of a Victorian Hospital including a Central Chateau, two Ward Blocks, and Nurses Accommodation. Historic England notes that the complex has interest and townscape value and would require a programme of historic building recording prior to any demolition proposal. Where possible historic buildings should be retained and enhanced.  The site is not in an Archaeological Priority Zone however further archaeological assessment is required as the site is over 0.5 ha and should be acknowledged as a tier 4 designation within the APA tier system under Historic England's 'Greater London Archaeological Priority Area Guidelines' so should be assessed for archaeological significance.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity to Grove Park Cutting (Borough Open Land and Site of Importance for Nature Conservation). Redevelopment should complement the setting of existing open spaces.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The site (SFRA Level II, Analysis 10) passes the sequential test which confirms 'more vulnerable' development (mixed use community and educational uses) is permitted in the Flood Zone 1.  The SFRA also makes the following recommendations to reduce vulnerability to flooding. <ul style="list-style-type: none"> <li>• A site specific FRA is required for development sites greater than 1ha in Flood Zone 1.</li> </ul>

				<ul style="list-style-type: none"> <li>All uses are acceptable in Flood Zone 1.</li> <li>The sites are located within a Critical Drainage Area and therefore robust surface water management will be critical.</li> <li>Sewer capacity within Southwark is known to be constrained under higher return period events.</li> <li>SuDS should be implemented to manage surface water flood risk and restrict post-development runoff to greenfield rates. Geological data suggests that some of the sites are potentially suitable for infiltration SuDS; whilst for others significant constraints are present. SuDS selection and design should be in accordance with the sustainable drainage hierarchy and provide sufficient capacity to cater for up to the 1 in 100 year storm event, incorporating the latest guidance regarding climate change. Proposals for infiltration SuDS should be supported by site-specific permeability testing.</li> <li>Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</li> <li>Any development proposals incorporating new or extended basement areas must be accompanied by a Basement Impact Assessment, demonstrating that the development will be safe from a flood risk perspective and will not have any adverse impacts on local hydrogeology.</li> </ul> <p>A flood risk assessment on this site was submitted and reviewed as part of the planning process for the approved developments on this site. The Environment Agency raised no objection subject to a list of conditions being met in relation to managing the surface water runoff from the site and the potential risk of contamination on site during the construction process. These conditions formed part of the planning permission granted.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	-	-	The proposed site allocation does not have any effect on the achievement of this objective as there is no new housing required within the site allocation.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	-	No new green links or being provided, the proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
			✓	NSP policies require development to provide cycle storage to support development. This will ensure more active modes of transport in the area and reduce reliance on the car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The proposed delivery of a new secondary school and health centre at the East Dulwich Community Hospital site will significantly improve social infrastructure provision for the benefit of existing and future residents. It will promote healthier lifestyles and enable people to meet their needs for health and education provision.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP40: Goose Green Trading Estate				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished, and during the construction will address poverty and encourage wealth creation.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	A wider provision employment will help the population become more skilled within the newly provided business and industrial floor space ((E(g) and B use classes), and in commercial uses centred around the office use.
IIAO 3	To improve the health of the population	✓	✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion.
IIAO 6	To reduce contributions to climate change	✓	✓	NSP policies require non-residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon. This will help demonstrate the move towards a reduction in our carbon footprint and contribution to alleviating climate change through new exemplary buildings in the borough.
IIAO 7	To improve the air quality	✓	✓	NSP policy requires development to meet air quality neutral standards and improve air quality
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use, along with water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, , but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	The site is in proximity to the designated Goose Green (Borough Open Land) and Goose Green Playground (Other Open Space). This will be protected.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site abuts the Grade II listed Dulwich Public Baths. Any redevelopment must protect and enhance the setting of this building.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity to the designated Goose Green (Borough Open Land) and Goose Green Playground (Other Open Space). Redevelopment should complement the setting of existing open spaces.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The site (SFRA Level II, Analysis 10) passes the sequential test which confirms 'more vulnerable' development (mixed use employment and residential uses) is permitted in the Flood Zone 1.</p> <p>The SFRA also makes the following recommendations to reduce vulnerability to flooding.</p> <ul style="list-style-type: none"> <li>• A site specific FRA is required for development sites greater than 1ha in Flood Zone 1.</li> <li>• All uses are acceptable in Flood Zone 1.</li> <li>• The sites are located within a Critical Drainage Area and therefore robust surface water management will be critical.</li> <li>• Sewer capacity within Southwark is known to be constrained under higher return period events.</li> <li>• SuDS should be implemented to manage surface water flood risk and restrict post-development runoff to greenfield rates. Geological data suggests that some of the sites are potentially suitable for infiltration SuDS; whilst for others significant constraints are present. SuDS</li> </ul>

				<p>selection and design should be in accordance with the sustainable drainage hierarchy and provide sufficient capacity to cater for up to the 1 in 100 year storm event, incorporating the latest guidance regarding climate change. Proposals for infiltration SuDS should be supported by site-specific permeability testing.</p> <ul style="list-style-type: none"> <li>• Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</li> <li>• Any development proposals incorporating new or extended basement areas must be accompanied by a Basement Impact Assessment, demonstrating that the development will be safe from a flood risk perspective and will not have any adverse impacts on local hydrogeology.</li> </ul>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	-	-	No new green links or being provided, the proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
			✓	NSP policies require development to provide cycle storage to support development. This will ensure more active modes of transport in the area and reduce reliance on the car.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓	-	No new infrastructure will be provided as part of the development directly.
			✓	The development would be subject to CIL payments

Integrated impact assessment for

**AV.09 Elephant and Castle**

Including

**Elephant and Castle Area Vision and site allocations NSP41 – NSP47 as follows:**

- NSP41: Newington Triangle
- NSP42: Bakerloo Line Sidings and 7 St George's Circus
- NSP43: 63-85 Newington Causeway
- NSP44: Salvation Army Headquarters, Newington Causeway
- NSP45: Elephant and Castle Shopping Centre and London College of Communication
- NSP46: London Southbank University Quarter
- NSP47: 1-5 Westminster Bridge Road

IIAO	Elephant and Castle				NSP41	NSP42	NSP43	NSP44	NSP45	NSP46	NSP47
	Area wide	S	M	L							
IIAO 1	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 2	✓✓	✓	✓	✓✓	✓	✓	✓✓	✓	✓✓	✓✓	✓
IIAO 3	✓	✓	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓
IIAO 4	✓	-	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 5	✓	x	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 6	-	?	-	✓	✓	-	-	-	-	-	-
IIAO 7	-	?	-	✓	-	-	-	✓	✓✓	✓✓	-
IIAO 8	-	-	-	-	-	-	-	-	-	-	-
IIAO 9	-	-	-	-	-	-	-	-	-	-	-
IIAO 10	-	-	-	-	-	-	-	-	-	-	-
IIAO 11	✓✓	-	✓	✓✓	✓✓	✓	✓	✓	✓✓	✓✓	✓
IIAO 12	✓	-	✓	✓	✓✓	✓	✓	✓	✓✓	✓	✓
IIAO 13	✓	-	✓	✓	✓✓	✓	✓	✓	✓✓	-	-
IIAO 14	✓	-	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 15	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	-	✓✓
IIAO 16	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓
IIAO 17	✓✓	-	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
Avg.	50%	17%	41%	62%	68%	56%	56%	59%	74%	59%	50%

Elephant and Castle Area Vision						
IIA Objective	Description	Area wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	On employment sites the re-provision of at least the equivalent level of employment floorspace or 50% of the sites total development capacity is safeguarded, whichever is greater. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Site allocations for the most part allow for the delivery of flexible workspace to provide a diverse range of employment opportunities. The transition away from light industrial uses in some cases (NSP41 and NSP43) could result in the loss of this type of job opportunity, further curation of the employment offer would help manage the risk of creating a one-dimensional local economy. Town centre uses and active frontages proposed across many of the sites within the vision area should create a vibrant urban area which capitalises upon the growing tourism industry of Elephant and Castle, thus helping to generate a more diverse supply of local employment opportunities. Provision of research and education facilities to support LSBU quarter will create a more skilled and educated population and a greater proportion of higher paid jobs in time. The vision requires development provides opportunities for small businesses, including those which are part of and serve the local Latin American community. This should help encourage wealth creation across a range of existing groups located in the Elephant and Castle vision area.
IIAO 2	To improve the education and skill of the population	✓✓	✓	✓	✓✓	Provision of research and education facilities to support the LSBU quarter will create a more skilled and educated population. Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓	✓	✓	✓✓	Enhancement of the low-line walking route, green links and planned cycle networks will promote active lifestyles and help reduce the causes and exposure to poor air quality. High density development around Elephant and Castle roundabout will free up space and routes between building plots to improve legibility and promote social interaction. More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant. Potential delivery of new community health hubs (NSP42, NSP43, NSP44 and NSP45) will ensure sufficient, accessible and higher quality primary and community health services for a growing population. The vision includes the aspiration for development that should support the provision of a new community health hub for the area which will address health needs of the population in the local area in the future.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	-	✓	✓	New public spaces and the vibrant mix of uses proposed at NSP45 Elephant and Castle Shopping Centre sites will deliver two vibrant destinations and hubs of activity which draw together a variety of groups to promote social cohesion and improve safety.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	x	✓	✓✓	High quality and inclusive public realm enhancements will be accessible to all groups. Low-line, green links and planned cycle ways will create a more legible urban environment to avoid physical barriers and issues of severance. New public spaces and the vibrant mix of uses proposed at NSP45 Elephant and Castle Shopping Centre site will deliver two vibrant destinations and hubs of activity which draw together a variety of groups and promote social cohesion. Enhanced accessibility and public realm around Elephant and Castle Station, including step-free access and a new ticket hall for the Northern Line and Bakerloo Line extension will improve access to facilities and opportunities for all. The Southwark Playhouse cultural use will be retained at NSP43. In the short term there may be disruptions to local communities from the concentration of large scale redevelopment in a localised area.
IIAO 6	To reduce contributions to climate change	-	?	-	✓	Low-line, green links, planned cycle ways and improved access to Elephant and Castle Station will promote active and sustainable transport modes, improving air quality and reducing greenhouse gas

						emissions. Enhanced green linkages and new public spaces proposed at NSP45 Elephant and Castle Shopping Centre site, and NSP42 Bakerloo Sidings site will encourage urban greening to adapt to the effects of climate change, reduce the urban heat island effect and increase ecological resilience in the Heygate and Aylesbury local restoration area. Despite excellent public transport links, the Elephant and Castle junction experiences some of the heaviest congestion in the borough – CO2 emissions suffer as a result and these could be exacerbated by accelerated levels of construction and demolition. NSP policies seek to minimise carbon dioxide emissions from development to offset this impact.
IIAO 7	To improve the air quality	-	?	-	✓	Low-line, green links and planned cycle ways will promote active transport modes, helping to address the causes of poor air quality. Air quality in the area suffers as a result of congestion at the Elephant and Castle junction, this could be exacerbated by accelerated levels of construction and demolition. NSP policies requires development to meet air quality neutral standards and improve air quality
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset this impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	All site allocations promote the re-use of previously developed sites may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to fewer largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	-	✓	✓✓	Development will be respectful to the designations of conservation areas and strategic viewing corridors where they apply. All existing open space is due to be retained whilst new public spaces proposed at NSP45 Elephant and Castle Shopping Centre site, and NSP42 Bakerloo Sidings site will encourage urban greening and landscape enhancements. Enhanced high-quality public realm should provide for a much improved townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	Development will be respectful to the designations of conservation areas and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant. The Southwark Playhouse cultural use will be retained at NSP42 to safeguard an important cultural asset.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	All existing open space is due to be retained whilst new public spaces is proposed at, NSP45 Elephant and Castle Shopping Centre site, and NSP42 Bakerloo Sidings site. Along with green links these will encourage urban greening and landscape enhancements. These provide the opportunity to create new habitats to reinforce the Heygate and Aylesbury ecology local restoration area.
IIAO 14	To reduce vulnerability to flooding	✓	-	✓	✓	The sites in the Elephant and Castle vision area are within flood risk zones 3 benefitting from defences. This means that where more vulnerable sites are proposed the exception test will be required to assess the benefits of the development and the flood risk mitigation measures proposed.  Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	The area vision and site allocations should deliver a significant number of new homes across the area. If these are delivered to policy requirements they will offer a range of different units and tenures which will provide for a range of different needs and create inclusive residential schemes accessible to all groups.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	The vision area already benefits from excellent public transport connections, supporting the intensification of development. Low-line, green links, planned cycle ways and station access improvements will further promote active transport modes

IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	-	✓	✓✓	New public spaces and the mix of uses proposed at NSP45 Elephant and Castle Shopping Centre site will deliver two vibrant destinations and hubs of activity. Green links will enhance connectivity across the sub-area. Several site allocations have been identified to potentially deliver a new health centre at NSP42, NSP43, NSP44 and NSP45 and this aspiration is included in the area vision.
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**NSP41: Newington Triangle**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. The site allocation will ensure the aggregate amount of employment generating floorspace currently on the site (including sui generis uses) would be retained or increased. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
<b>IIAO 2</b>	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	The area is currently well-served by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.
			✓✓	Redevelopment should support the Low Line walking route adjacent to the railway viaduct. Redevelopment should ensure continued accessibility to public transport and improve local connectivity and access to walking and cycle routes. The opportunities of walking in the low line will improve health and well-being of local population.
			✓✓	To provide new open space of at least 15% of the site area (1,640sqm) supports the current area (Bankside and the Borough) which is deficient in parks and other green spaces. New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialisation, nature conservation, food growing and cultural events. This will maintain and improve open spaces to ensure health and wellbeing benefits associated with these activities are accrued.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Improvements to the low-line will mitigate any anti-social behaviour in relation to the railway arches and support a reduction in crime and fear of crime.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunity for more families and individuals to reside in a prime location in the borough, near to employment opportunities.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	Community facilities should be made available for use by all members of the community. This will encourage community interaction and active, healthy lifestyles and social cohesion.
			✓✓	New community facilities will improve sense of community and reduce the risk of social isolation. Use of open space will promote community cohesion and equality to local population.
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	The site allocation must support Low-line routes through railway arches, this creates safer spaces for more active travel. Low-line, green links, planned cycle ways and improved access to for pedestrians will promote active and sustainable transport modes, improving air quality and reducing greenhouse gas emissions. NSP policies seek to minimise carbon dioxide emissions from development to offset this impact, which will also apply to planning applications made on this site.
<b>IIAO 7</b>	To improve the air quality	-	-	The site allocation makes no explicit reference to land uses that will reduce contributions to climate change. The overarching strategic and development planning policies in the New Southwark Plan will apply to this site. Policy P64 Improving Air Quality requires development to achieve or exceed air quality neutral standards. By improving air quality, this reduces the impact that pollutants can have on health, quality of life and life expectancy of local residents and on the environment.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.

IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	The site is suitable for a mixed-use development with active frontages on Newington Causeway. Redevelopment should support the Low Line walking route adjacent to the railway viaduct. Redevelopment should ensure continued accessibility to public transport and improve local connectivity and access to walking and cycle routes. Development proposals should have regard to existing local heritage and context. The provision of open space will complement the cluster of tall buildings at Elephant and Castle; and enhance Elephant and Castle town centre.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	The site is within the setting of Grade II listed buildings on Borough Road and Newington Causeway as well as undesignated heritage assets including the railway viaduct and buildings on Borough Road and Newington Causeway. The site is in proximity of Kings Bench and the Liberty of the Mint Conservation Areas. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The site is not in the proximity of designated open space. However new open space is required on the site, at least 15% of the site area (1,640sqm) which will improve open space provision for a growing population. Redevelopment of the site will include new open space. This will mitigate the pressure from development on existing open space; and enhance the Low Line and setting of the railway viaduct, the cluster of tall buildings at Elephant and Castle; and the Elephant and Castle town centre.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 – Analysis 11) will have a “more vulnerable” use (mixed use including open space, employment, residential, town centre and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- New community facilities will improve sense of community and reduce the risk of social isolation;</li> <li>- The provision of open space will promote community cohesion and equality to local population. This will encourage community interaction and active, healthy lifestyles and social cohesion;</li> <li>- New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialization, nature conservation, food growing and cultural events. This will maintain and improve open spaces to ensure health and wellbeing benefits associated with these activities are accrued.</li> <li>- Redevelopment should support the Low Line walking route adjacent to the railway viaduct. Redevelopment should ensure continued accessibility to public transport and improve local connectivity and access to walking and cycle routes. The opportunities of walking in the low line will improve health and well-being of local population;</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- Any redevelopment should provide public realm enhancements, to offer spaces for meeting, and informal recreation, to allow visitors and residents to explore and enjoy the area;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Basement dwellings should not be permitted on this site. Ground conditions should be</p>

				confirmed through site investigation, and dewatering of excavations and basement waterproofing implemented where required.  As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
			✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The site allocation already benefits from excellent public transport connections, supporting the intensification of development. The requirement to improve pedestrian movement and permeability through the site will further promote active transport modes. Redevelopment should support the Low Line walking route adjacent to the railway viaduct. Redevelopment should ensure continued accessibility to public transport and improve local connectivity and access to walking and cycle routes. This will support active forms of travel.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	New open space is a critical infrastructure that would be provided in this development.
			✓✓	The site must provide retail, community and leisure uses, this could include health, facilities, training centres, community centres, cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP42: Bakerloo Line Sidings and 7 St George's Circus				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. The site must provide new employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
IIAO 2	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant. More homes alleviate stresses attributed to lack of housing.
			✓✓	Redevelopment may provide a new community health hub, which would directly support health of local populations.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring "eyes on the streets" to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunity for more families and individuals to reside in a prime location in the borough, near to employment opportunities. Transforming a rail carriage depot into a mixed use development with new homes, green links, open spaces and public realm and active frontages with ground floor town centre use, provides essential social infrastructure for surrounding area, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	-	-	The site allocation makes no explicit reference to land uses that will reduce contributions to climate change. NSP policies seek to minimise carbon dioxide emissions from development to offset this impact. These overarching strategic and development planning policies in the New Southwark Plan will apply to this site.
IIAO 7	To improve the air quality	-	-	The site allocation makes no explicit reference to land uses that will reduce contributions to climate change. The overarching strategic and development planning policies in the New Southwark Plan will apply to this site. Policy P64 Improving Air Quality requires development to achieve or exceed air quality neutral standards. By improving air quality, this reduces the impact that pollutants can have on health, quality of life and life expectancy of local residents and on the environment.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, , but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. The site is suitable to provide a new residential led development with some town centre uses. Development should be of an appropriate density and design that responds positively to its context.
IIAO 12	To conserve and enhance the historic environment and cultural assets	ü	✓	The site is located within the setting of the Grade II* listed Obelisk situated at the centre of St George's Circus and is directly adjacent to Grade II listed buildings on Gladstone Street and London Road. The historic building 'One London Road' should be retained and integrated into any redevelopment. The site is almost entirely surrounded by the West Square Conservation Area and St George's Circus Conservation Area. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in proximity to Geraldine Mary Harmsworth Park (Metropolitan Open Land). These would be protected with any proposed future development.

IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 – Analysis 11) will have a “more vulnerable’ use (mixed use including employment, residential, town centre and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- New community facilities will improve sense of community and reduce the risk of social isolation;</li> <li>- Redevelopment may provide a new community health hub, which would directly support health of local populations;</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Basement dwellings should not be permitted on this site. Ground conditions should be confirmed through site investigation, and dewatering of excavations and basement waterproofing implemented where required.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	<p>Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</p> <p>It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.</p> <p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.</p> <p>A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p> <p>By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.</p>
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	<p>The site allocation already benefits from excellent public transport connections, supporting the intensification of development. The requirement to improve pedestrian movement and permeability through the site will further promote active transport modes.</p>
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	<p>A new community health hub is a critical social infrastructure for Elephant and Castle which could possibly be provided on this site.</p> <p>Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.</p>



NSP43: 63-85 Newington Causeway

IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and may provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
		✓✓	✓✓	Redevelopment should deliver a more complementary and harmonious mix of uses alongside the retained Southwark Playhouse theatre, subject to need, that emphasises its cultural significance, attracts more visitors to the area and creates active frontages on Newington Causeway. Redevelopment should enhance accessibility to public transport, walking and cycle routes.
IIAO 2	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	The area is currently well-served by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.
			✓✓	Redevelopment may provide a new community health hub, which would directly support health of local populations.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide an opportunity for more families and individuals to reside in a prime location in the borough, near to employment opportunities.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	-	-	The site allocation makes no explicit reference to land uses that will reduce contributions to climate change. NSP policies seek to minimise carbon dioxide emissions from development to offset this impact. These overarching strategic and development planning policies in the New Southwark Plan will apply to this site.
IIAO 7	To improve the air quality	-	-	The site allocation makes no explicit reference to land uses that will reduce contributions to climate change. The overarching strategic and development planning policies in the New Southwark Plan will apply to this site. Policy P64 Improving Air Quality requires development to achieve or exceed air quality neutral standards. By improving air quality, this reduces the impact that pollutants can have on health, quality of life and life expectancy of local residents and on the environment.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	ü	✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is within the setting of Grade II listed building Inner London Sessions Court and the undesignated heritage asset Newington Gardens and undesignated heritage assets on Newington Causeway. The site is within the setting of the Trinity Church Square Conservation Area. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is in close proximity to Newington Gardens (Borough Open Land).These are protected as part of any proposed, future redevelopment.

IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 – Analysis 11) will have a “more vulnerable’ use (mixed use including employment, residential, town centre and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- New community facilities will improve sense of community and reduce the risk of social isolation;</li> <li>- Redevelopment should deliver a more complementary and harmonious mix of uses alongside the retained Southwark Playhouse theatre, subject to need, that emphasises its cultural significance, attracts more visitors to the area and creates active frontages on Newington Causeway;</li> <li>- Retain the existing theatre use or provide an alternative cultural use (D2); supports community and leisure, which overall provides well-being benefits to residents;</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Basement dwellings should not be permitted on this site. Ground conditions should be confirmed through site investigation, and dewatering of excavations and basement waterproofing implemented where required.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	<p>Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</p> <p>It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.</p> <p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.</p> <p>A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p> <p>By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.</p>
IIAO 16	To promote sustainable transport and minimise the need	✓✓	✓✓	<p>Redevelopment should enhance accessibility to public transport, walking and cycle routes.. This will promote sustainable transport and minimise the need to travel by car.</p>

	to travel by car			
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The potential for a community health hub and retention of the theatre are critical social infrastructure interventions that would be provided in this development. Active frontages and retail, community or leisure uses will improve the ground floor environment.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP44: Salvation Army Headquarters, Newington Causeway				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and may provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
IIAO 2	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	Redevelopment should enhance local accessibility to bus stops, tube and rail stations and contribute towards improving the connectivity, walking and cycle routes, specifically taking into consideration the Newington Causeway project (TfL and Southwark). This improvement in accessibility, should promote the well-being of local population, and their ability to access other parts of the city, thereby alleviating stress.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
			✓✓	The provision of retail, community or leisure uses and the potential for a new community health hub will benefit new residents and the existing local community. It will also provide valuable infrastructure to improve health and well-being benefits to residents.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring "eyes on the streets" to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	Improved local accessibility through bus stops, tubes, rail stations, walking and cycling routes will increase the number of people passing through the area and thereby reduce fear and/or incidences of crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunity for more families and individuals to reside in a prime location in the borough, near to employment opportunities.
			✓✓	New community facilities will improve opportunities for social interaction and social cohesion in the area.
			✓✓	Enhanced local accessibility to bus stops, tube and rail stations contribute towards improving the connectivity, walking and cycle routes, specifically taking into consideration the Newington Causeway project (TfL and Southwark). This will increase the diversity of people able to access and travel around the local area. It will also improve social inclusion as more people have more options for travel between work and home.
IIAO 6	To reduce contributions to climate change	-	-	The site allocation makes no explicit reference to land uses that will reduce contributions to climate change. NSP policies seek to minimise carbon dioxide emissions from development to offset this impact. These overarching strategic and development planning policies in the New Southwark Plan will apply to this site.
IIAO 7	To improve the air quality	✓✓	✓✓	Enhanced local accessibility to bus stops, tube and rail stations contribute towards improving the connectivity, walking and cycle routes, specifically taking into consideration the Newington Causeway project (TfL and Southwark). This will discourage less sustainable forms of travelling and consolidate travel, which overall leads to an improvement in air quality. This can further be supported by improved Low line walking routes.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is within the setting of Grade II listed building Metro Central Heights and undesignated heritage assets on Newington Causeway. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	There is no designated open space in proximity to this site allocation.

IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 – Analysis 12) will have a “more vulnerable’ use (mixed use including employment, residential, town centre and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- New community facilities will improve sense of community and reduce the risk of social isolation;</li> <li>- Redevelopment should enhance local accessibility to bus stops, tube and rail stations and contribute towards improving the connectivity, walking and cycle routes, specifically taking into consideration the Newington Causeway project (TfL and Southwark). This improvement in accessibility, should promote the well-being of local population, and their ability to access other parts of the city, thereby alleviating stress;</li> <li>- Enhanced local accessibility to bus stops, tube and rail stations contribute towards improving the connectivity, walking and cycle routes, specifically taking into consideration the Newington Causeway project (TfL and Southwark). This will discourage less sustainable forms of travelling and consolidate travel, which overall leads to an improvement in air quality. This can further be supported by improved Low line walking routes;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- Redevelopment should enhance local accessibility to bus stops, tube and rail stations and contribute towards improving the connectivity, walking and cycle routes, specifically taking into consideration the Newington Causeway project (TfL and Southwark).</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Basement dwellings should not be permitted on this site. Ground conditions should be confirmed through site investigation, and dewatering of excavations and basement waterproofing implemented where required.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	ü✓	✓✓	<p>Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</p> <p>It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.</p> <p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement</p> <p>A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p>

			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment should enhance local accessibility to bus stops, tube and rail stations and contribute towards improving the connectivity, walking and cycle routes, specifically taking into consideration the Newington Causeway project (TfL and Southwark).
			✓✓	The low line also abuts the development which should be improved with any future development.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The potential for a community health hub is a critical social infrastructure intervention that would be provided in this development.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP45:Elephant and Castle Shopping Centre and London College of Communication**

**Relevant applications:**

16/AP/4458 (approved with legal agreement)

Phased, mixed-use redevelopment of the existing Elephant and Castle shopping centre and London College of Communication sites comprising the demolition of all existing buildings and structures and redevelopment to comprise buildings ranging in height from single storey to 35 storeys (with a maximum building height of 124.5m AOD) above multi-level and single basements, to provide a range of uses including 979 residential units (use class C3), retail (use Class A1-A4), office (Use Class B1), Education (use class D1), assembly and leisure (use class D2) and a new station entrance and station box for use as a London underground operational railway station; means of access, public realm and landscaping works, parking and cycle storage provision, plant and servicing areas, and a range of other associated and ancillary works and structures.

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site represents one of the most significant growth opportunities in Southwark and will transform the town centre environment in Elephant and Castle, creating new shops, jobs, civic space, community and leisure uses and significant public transport improvements. The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
			✓✓	Provide at least the amount of education floorspace (D1) currently on the site used by London College of Communication. This will be of improved quality and more appropriately support local community.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	The provision of retail, community and leisure uses will benefit new residents and the existing local community. It will also provide valuable infrastructure to improve health and well-being benefits to residents.
			✓✓	Redevelopment should enhance connectivity to the existing cycle network and walking routes, improving the accessibility to the bus, tube and station interchange and enable the Low Line walking route. This will improve opportunities for active travel, which supports health and well-being of the population.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Redevelopment should enhance connectivity to the existing cycle network and walking routes, improving the accessibility to the bus, tube and station interchange and enable the Low Line walking route, will directly improve the sense of security and reduce fear of crime in the area.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunity for more families and individuals to reside in a prime location in the borough, near to employment opportunities.
			✓✓	New community facilities will improve opportunities for social interaction and social cohesion in the area.
			✓✓	Redevelopment should enhance connectivity to the existing cycle network and walking routes, improving the accessibility to the bus, tube and station interchange and enable the Low Line walking route. This will increase the diversity of people able to access and travel around the local area. It will also improve social inclusion as more people have more options for travel between work and home.
<b>IIAO 6</b>	To reduce contributions to climate change	-	-	The site allocation makes no explicit reference to land uses that will reduce contributions to climate change. NSP policies seek to minimise carbon dioxide emissions from development to offset this impact. These overarching strategic and development planning policies in the New Southwark Plan will apply to this site.
<b>IIAO 7</b>	To improve the air quality	✓	✓	A more walkable streetscape will improve and encourage active travel. New cycle and walking routes with substantial areas of landscaping and high quality public realm enhancements and should improve the air quality and support biodiversity.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.

IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Redevelopment of the site must enhance the local townscape by providing high quality active frontages including retail, community or leisure uses at appropriate ground floor locations. This site represents one of the most significant growth opportunities in Southwark. Redevelopment takes advantage of the site's potential to deliver a comprehensive mixed-use development in this highly accessible location, with substantial areas of landscaping and high quality public realm enhancements. It is anticipated that the Elephant and Castle Shopping Centre will be demolished to facilitate a restructuring of the area's layout. Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	The site is within the setting of Grade II listed buildings on Newington Butts and St George's Road, the Metropolitan Tabernacle and in close proximity of the Michael Faraday Memorial and Metro Central Heights. The site is also within the setting of the undesignated heritage asset of the railway viaduct running from north to south through Elephant and Castle. The site is immediately adjacent to Elliott's Row Conservation Area as well as numerous other conservation areas in Southwark and Lambeth.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The site is in proximity to Elephant and Castle Peninsula (Borough Open Land). These are protected as part of any proposed, future redevelopment. Street trees will be protected.
			✓✓	Redevelopment of the site must provide new civic space, and enhancements to the public realm, including new access routes such as the Low Line along the railway viaduct; and, with substantial areas of landscaping and high quality public realm enhancements. Provide a new tube station entrance
			✓✓	The site allocation will improve enjoyment of the Thames Path; and mark an arrival point into Southwark; enhance the Low Line and setting of the railway viaduct. This will all work to contribute the green infrastructure in the area.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 – Analysis 12) will have a “more vulnerable” use (mixed use including employment, residential, town centre, education, open space, tube station and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- ;</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- New community facilities will improve sense of community and reduce the risk of social isolation;</li> <li>- The provision of community and leisure uses (D1) class through a new community health hub will benefit new residents and the existing local community. It will also provide valuable infrastructure to improve health and well-being benefits to residents;</li> <li>- Provide at least the amount of education floorspace (D1) currently on the site used by London College of Communication. This will be of improved quality and more appropriately support local community;</li> <li>- The provision of open space will promote community cohesion and equality to local population. This will encourage community interaction and active, healthy lifestyles and social cohesion;</li> <li>- New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialization, nature conservation, food growing and cultural events. This will maintain and improve open spaces to ensure health and wellbeing benefits associated with these activities are accrued.</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- Redevelopment of the site must provide new civic space, and enhancements to the public realm, including new access routes such as the Low Line along the railway viaduct; and, with substantial areas of landscaping and high quality public realm enhancements. Provide a new</li> </ul>

				<p>tube station entrance;</p> <ul style="list-style-type: none"> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape;</li> <li>- Redevelopment should enhance connectivity to the existing cycle network and walking routes, improving the accessibility to the bus, tube and station interchange and enable the Low Line walking route, will directly improve the sense of security and reduce fear of crime in the area. This will also improve opportunities for active travel, which supports health and well-being of the population;</li> <li>- A more walkable streetscape will improve and encourage active travel. New cycle and walking routes with substantial areas of landscaping and high quality public realm enhancements and should improve the air quality and support biodiversity.</li> </ul> <p>Approved application 16/AP/4458 is relevant to this site allocation. An Environmental Statement (ES) (relevant chapter is Chapter 12) and a Flood Risk Assessment was submitted with this application and was considered in the decision making process. The ES predicts that proposed development would not increase flood risk elsewhere and that flooding impacts would be insignificant. A surface water drainage strategy has been submitted which includes measures to reduce water run-off from the site and takes into account potential future increases in rainfall owing to climate change. Surface water run-off from the site would be attenuated through the use of underground storage tanks and a green roof. Through these measures surface water run-off would be reduced by 50% over the existing situation. The ES predicts that this would have a long-term, local, beneficial impact of minor significance.</p> <p>The Environment Agency was consulted during the planning process for this application and they did not object to the proposal</p> <p>As such, the exception test is satisfied whereby the flood risk to people and property will be managed satisfactorily through appropriate mitigation measures proposed under the approved application, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
			✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Redevelopment should enhance connectivity to the existing cycle network and walking routes, improving the accessibility to the bus, tube and station interchange and enable the Low Line walking route.
			✓✓	A new tube station entrance should make the surrounding area easier to navigate.
			✓✓	It is anticipated that the Elephant and Castle Shopping Centre will be demolished to facilitate a restructuring of the area's layout to make the site more accessible by different modes of transport.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The delivery of civic space is a critical social infrastructure intervention that would be provided in this development.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP46: London Southbank University Quarter**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs in the research and education sector which will tackle poverty and wealth creation.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓	The site is an important research and education facility for the London Southbank University supporting higher education, skills and research, creating a wide range of education opportunities and jobs.
			✓✓	Provide research and education facilities or otherwise support the functioning of London Southbank University Quarter, this will overall support education provision to local population.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	More job opportunities generated by research, education, retail, community or leisure uses which will help reduce poverty as an underlying determinant.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Permeability should be improved through the site with the potential for improved connectivity for pedestrians and cyclists. Any redevelopment must provide links to Cycle Super Highway 7 on Southwark Bridge Road. This will reduce incidences of crime and fear of crime in the area as the public realm is more legible therefore supporting natural surveillance.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Permeability should be improved through the site with the potential for improved connectivity for pedestrians and cyclists. Any redevelopment must provide links to Cycle Super Highway 7 on Southwark Bridge Road. This will improve the diversity of people able to access the research and education facilities. Secondly, this promotes social inclusion and equality.
<b>IIAO 6</b>	To reduce contributions to climate change	-	-	The site allocation makes no explicit reference to land uses that will reduce contributions to climate change. NSP policies seek to minimise carbon dioxide emissions from development to offset this impact. These overarching strategic and development planning policies in the New Southwark Plan will apply to this site.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Permeability should be improved through the site with the potential for improved connectivity for pedestrians and cyclists. Any redevelopment must provide links to Cycle Super Highway 7 on Southwark Bridge Road. This should improve air quality and reduce congestion caused by vehicular traffic.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Permeability should be improved through the site with the potential for improved connectivity for pedestrians and cyclists. Any redevelopment must provide links to Cycle Super Highway 7 on Southwark Bridge Road. Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site includes Grade II listed buildings on London Road and Borough Road and is in close proximity of the Grade II* listed Obelisk at the centre of St George’s Circus. The site includes a building on the Heritage at Risk Register (HAR). Part of the site lies within the St George’s Circus Conservation Area and is in close proximity to the West Square Conservation Area. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	-	-	The site is not in the proximity to designated open spaces.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The site (in SFRA level 2 – Analysis 11) passes the sequential test which confirms ‘Less Vulnerable’ development (mixed use including research/education and town centre uses) is permitted in the Flood Zone 3.
				For any development proposals on site, recommendations are also set out in the report to manage surface water flood risk coming with the constrained sewer capacity under higher return period events, including SuDS to restrict post-development runoff to greenfield rates.
				When a planning application is submitted on the site, a site-specific FRA will be required to demonstrate that the development will be safe during its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.

				As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.
IIAO 15	To provide everyone with the opportunity to live in a decent home	-	-	The site allocation does not require housing to be delivered.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Permeability should be improved through the site with the potential for improved connectivity for pedestrians and cyclists. Any redevelopment must provide links to Cycle Super Highway 7 on Southwark Bridge Road.
			✓✓	Provide for connected pedestrian environments, specifically direct walking routes through Elephant and Castle and links to the new safe cycle passage and a thoroughfare for all. It is anticipated that the redevelopment will happen over time and improved permeability and routes will be unlocked incrementally. This supports all forms of active travel.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The delivery of higher education facilities is a critical social infrastructure intervention.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP47: 1-5 Westminster Bridge Road				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
IIAO 2	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	The area is currently well-serviced by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Active frontages will enliven the natural surveillance in the area, thereby reducing the fear and incidence of crime.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	A variety of town centre uses may be accommodated at ground floor level, and community uses would be particularly suitable benefitting new and existing residents. Active frontages will enliven the area, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.
IIAO 6	To reduce contributions to climate change	-	-	The site allocation makes no explicit reference to land uses that will reduce contributions to climate change. NSP policies seek to minimise carbon dioxide emissions from development to offset this impact. These overarching strategic and development planning policies in the New Southwark

				Plan will apply to this site.
IIAO 7	To improve the air quality	-	-	The site allocation makes no explicit reference to land uses that will reduce contributions to climate change. The overarching strategic and development planning policies in the New Southwark Plan will apply to this site. Policy P64 Improving Air Quality requires development to achieve or exceed air quality neutral standards. By improving air quality, this reduces the impact that pollutants can have on health, quality of life and life expectancy of local residents and on the environment.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	A comprehensive mixed-use development will provide an uplift in floorspace, enabling the continued provision of office space, alongside new residential units. Redevelopment must successfully relate to the St George's Circus building line.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is within the setting of the Grade II* listed Obelisk at the centre of St George's Circus and to other Grade II listed buildings on London Road and Borough Road. The site lies partially within the St George's Circus Conservation Area and affects the setting of the West Square Conservation Area. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	The site is not in the proximity of designated open space.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 - Analysis11) will have a "more vulnerable" use (mixed use including employment, residential and town centre uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- ;</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas. Basement dwellings should not be permitted on this site. Ground conditions should be confirmed through site investigation, and dewatering of excavations and basement waterproofing implemented where required.</p>

				As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
			✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	NSP Policies require development to be supported by cycle storage to facilitate more sustainable modes of transport.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could provide retail, community or leisure uses, this could include health, facilities, training centres, community centres, cinemas, music halls, gymnasiums and other assembly and leisure infrastructure facilities for the community at large, which can help to encourage more community interaction and community cohesion.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

Integrated impact assessment for

**AV10 Herne Hill and North Dulwich**

Including:

NSP48 - Bath Trading Estate

	AV10				NSP48
	Area wide	S	M	L	
IIAO 1	✓	✓	✓	✓	✓✓
IIAO 2	-	-	-	-	✓✓
IIAO 3	✓	-	✓	✓	✓✓
IIAO 4	-	-	-	-	✓✓
IIAO 5	✓	-	✓	✓	✓✓
IIAO 6	✓	-	-	✓	✓✓
IIAO 7	✓	-	-	✓	✓✓
IIAO 8	-	-	-	-	-
IIAO 9	-	-	-	-	-
IIAO 10	-	-	-	-	-
IIAO 11	✓	✓	✓	✓	✓
IIAO 12	✓	-	✓	✓	✓
IIAO 13	✓	-	✓	✓	✓✓
IIAO 14	✓	✓	✓	✓	✓
IIAO 15	✓	✓	✓	✓	✓✓
IIAO 16	✓	✓	✓	✓	✓
IIAO 17	✓	✓	✓	✓	✓✓
Avg.	35%	17%	29%	35%	71%

**Integrated Impact Assessment for:**

AV10 Herne Hill and North Dulwich and site allocation NSP48 as follows:

NSP48 - Bath Trading Estate

Herne Hill & North Dulwich Area Vision						
IIA Objective	Description	Area wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	✓	✓	Development will seek to expand and diversify the business cluster around the railway viaducts to deliver a wider provision of local job opportunities and tackle any local unemployment. The single site allocation (NSP48) is reflective of this approach by seeking to contribute to the existing business cluster of Herne Hill by providing at least the equivalent amount of employment floorspace currently on the site and by introducing more intensive uses on site to increase the number of local job opportunities. However, the limited provision of additional employment floorspace is unlikely to provide a significant uplift in local job opportunities.
IIAO 2	To improve the education and skill of the population	-	-	-	-	The lack of employment space or education provision identified is unlikely to significantly improve education or level of skilled workers in Herne Hill, although the relative prosperity of the area perhaps does not necessitate a substantial need.
IIAO 3	To improve the health of the population	✓	-	✓	✓	Enhancement of green links and planned cycle networks will promote active lifestyles and help reduce the causes and exposure to poor air quality. Herne Hill benefits from substantial greenspace assets for leisure and recreation to encourage healthy lifestyles, most notably Brockwell Park, located in the London Borough of Lambeth. More job opportunities generated by employment space uplift and town centre uses will help reduce poverty as an underlying determinant. Proposals will deliver an improved quality and provision of housing accessible to all groups.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	-	-	Herne Hill benefits from comparatively low-levels of crime and deprivation. Improved permeability and activation of frontages along Half Moon Lane, Herne Hill and Norwood Road displaying a vibrant mix of uses will promote social interaction and the feeling of public safety.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	-	✓	✓	Green links and planned cycle ways will create a more legible urban environment to avoid physical barriers and address issues of severance. Vibrant mix of town centre uses and active frontages proposed along Norwood Road, Herne Hill and Half Moon Lane will promote social interaction.
IIAO 6	To reduce contributions to climate change	✓	-	-	✓	Green links and planned cycle ways to the north of Herne Hill vision area will promote active transport and sustainable modes, improving air quality and reducing greenhouse gas emissions. Herne Hill benefits from substantial existing greenspace which mitigate the effects of climate change and urban heat island effect. Proposed new open space towards top of Half Moon Lane will improve this. Priority of walking, cycling and public transport should reduce pressure on car parking and improve accessibility. NSP policies seek to minimise carbon dioxide emissions arising from development.

IIAO 7	To improve the air quality	✓	-	-	✓	Green links and planned cycle ways will promote active transport modes, helping to address the causes of poor air quality. Air quality in the area is generally good benefitting from the lower densities and extensive greenspace. NSP policies requires development to meet air quality neutral standards and improve air quality Priority of walking, cycling and public transport will reduce pressure on car parking and improve accessibility, thus reducing reliance on the private car.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	NSP policies require adequate management of waste arising from construction and intensified development in accordance with the waste management hierarchy. The minor amount of development proposed and reuse of an existing site is likely to have a comparatively low impact upon waste arising from demolition and development.
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	The comparatively low uplift in employment and residential floorspace may place some minor additional pressures on the water network. Development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset this impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land where applicable. NSP48 Bath Trading Estate promotes the re-use of previously developed land and may provide opportunities to improve ground conditions if parts of the site are cleared and redeveloped.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	Development will be respectful to the designations of conservation areas where they apply. All development sites will be sensitive to their respective character setting and will seek to enhance the environment they are situated within. Development at NS48 should carefully consider the sites relation to Brockwell Park.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	The biodiversity and existing open space of Herne Hill will be enhanced by green linkages creating a more legible environment and green corridors to promote biodiversity, supporting the aspirations of the Strategic Habitat Corridor running through the sub-area.
IIAO 14	To reduce vulnerability to flooding	✓	✓	✓	✓	The Herne Hill and North Dulwich area falls within Flood Zone 1, which means that all development is acceptable without the need to pass the exception test.  Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. The sub-area falls within the Critical Drainage Area and Herne Hill has been subject to several serious surface water flooding incidents over the past 20 years. In response to this the area vision specifically requires that development should improve surface water drainage in the area to address and mitigate this risk., while NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓	✓	✓	✓	Whilst development opportunities in Herne Hill are relatively limited, infill sites have the potential to contribute towards meeting Southwark's housing need. If these are delivered to policy requirements they will offer a range of different units and tenures which will provide for a range of different needs

						and create inclusive residential schemes accessible to all groups.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	Priority of walking, cycling through green links and planned cycle ways, will reduce pressure on car parking and improve accessibility, thus reducing reliance on the private car.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓	✓	✓	✓	The extensive open space and greenspace assets of Herne Hill will be retained and proposed green links will create a more legible and connected environment.

**NSP48 – Bath Trading Estate**

<b>IIA Objective</b>	<b>Description</b>	<b>Grading</b>	<b>Sub-grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The redevelopment on site is required to provide at least the existing employment B use floorspace, which lead to the same or often more local opportunities and tackle local unemployment. It will provide for the small business cluster, including creative and cultural industries, to support the small and independent businesses. In addition to employment floorspace, the intensive uses on site will bring forward town centre uses, including retail and community, that will create job opportunities and generate economic opportunities, reducing poverty.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	The provision of employment floorspace and town centre uses will provide a vital skill base for job training for the local population. Under NSP policies significant levels of construction and uplift in employment space will also provide training in construction and in the final development.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	The creation of job opportunities from employment floorspace and town uses will help tackle unemployment, which is an underlying determinant of health. Besides, the redevelopment will provide a new link to Half Moon Lane that will improve walkability and in turn promote active lifestyle.
			✓✓	The site is in proximity to green space such as Brockwell Park in Lambeth Borough, allowing residents to access the green infrastructure for better mental well-being. The potential residential provision, under NSP policies, will also provide housing of all tenures and sizes for residents on different incomes and backgrounds.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The provision of high quality active frontages at the ground floor, combined with the new link to Half Moon Lane, will attract footfall and animation in the area. It will effectively promote “eyes on the street”, improving the perception of safety and reducing incentives of offensive behaviour.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The vibrant mix of town centre uses along Half Moon Line and in the arches of the railway viaduct will be accessible to all residents, promoting social interaction and community cohesion. The affordable housing policy will also ensure any new residential development on site will help create a diverse community with new homes of different tenures and sizes.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	The improved connectivity and walkability within the site and with the wider area promotes active travel modes including walking and cycling, thus reducing the reliance on private vehicles and lowering the use of fossil fuels. Although demand for building materials and construction waste will be generated with redevelopment, the NSP policies will ensure the development to achieve carbon neutral through thoughtful design and offset contributions.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality. In addition, NSP policies require development to meet air quality neutral standards and improve air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Whilst substantial demolition will create new waste demands to be managed, the NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	The site has been previously developed, which offers a regeneration opportunity to remediate contaminated land, but soil quality is unlikely to significantly improve.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	Given the proximity to Brockwell Park, the site is required to develop in a sensitive manner to the setting of the park and reflect existing building heights. Any development proposals should also recognise the provision of policies and site allocations in Lambeth Local Plan for its proximity to the borough boundary. All These measures combined ensure the development to respect the local character, heritage and townscape.
<b>IIAO 12</b>	To conserve and enhance the	✓		The site lies partially within and is surrounded on the east side by Stadella Road Conservation Area and to the west is Brockwell Park, a

	historic environment and cultural assets		✓	Registered Landscape and Conservation Area. It is also directly adjacent to Grade II* listed building Half Moon public house and is in proximity of Grade II listed Herne Hill Baptist Church. Any development proposals must also consider heritage assets in Lambeth such as the ornate cast iron railway viaduct to the south of the site. In accordance with design policies, the development will be respectful to the respective character setting.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The accessibility to Brockwell Park will be enhanced by the new pedestrian link of Half Moon Line, which will promote the public appreciation of the significant green space. It will improve the green linkages and in turn promote the green corridors and biodiversity.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The site (SFRA Level 2 – Analysis 13) passes the sequential test which confirms ‘More Vulnerable’ development (mixed use including residential, employment and town centre uses) is permitted in the Flood Zone 1.</p> <p>For any development proposals on site, recommendations are set out in the report to manage surface water flood risk coming with the constrained sewer capacity under higher return period events, including SuDS to restrict post-development runoff to greenfield rates.</p> <p>When a planning application is submitted on the site, a site-specific FRA will be required to demonstrate that the development will be safe during its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.</p> <p>Basement dwellings are permitted in this area. A basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
			✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Through enhancing the pedestrian subway, the prescribed requirements will effectively promote walking and reduce the reliance on private vehicles.
<b>IIAO 17</b>	To provide the necessary	✓✓		The uplift in employment floorspace, alongside any potential new residential provision and town centre uses, will bring in job opportunities,

	infrastructure to support existing and future development		✓✓	encourage wealth creation and improvement in local infrastructure for the wider area. Not only will the redevelopment benefit the future occupiers, but also the wider community in the area who can enjoy the positive changes coming from the regeneration opportunity.
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## AV11 London Bridge Area vision

Including

NSP49 - London Bridge Health Cluster

NSP50 - Land between Melior Street, St Thomas Street, Weston Street and Fenning Street

NSP51 - Land between St Thomas Street, Fenning Street, Melior Place, and Snowsfields

NSP52 - Colechurch House, London Bridge Walk

IIAO	London Bridge				NSP49	NSP50	NSP51	NSP52
	Area wide	S	M	L				
IIAO 1	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 2	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓
IIAO 3	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 4	-	-	✓	✓	✓✓	✓✓	✓✓	✓✓
IIAO 5	✓	-	✓	✓	✓✓	✓✓	✓✓	✓✓
IIAO 6	?	?	-	✓	✓✓	-	✓✓	✓✓
IIAO 7	?	?	-	✓	✓✓	-	✓✓	✓✓
IIAO 8	-	-	-	-	-	-	-	-
IIAO 9	-	-	-	-	-	-	-	-
IIAO 10	-	-	-	-	-	-	-	-
IIAO 11	✓✓	-	✓	✓✓	✓	✓✓	✓	✓
IIAO 12	✓	-	✓	✓	✓	✓	✓	✓
IIAO 13	✓	-	✓	✓	✓	✓	✓	-
IIAO 14	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 15	✓✓	✓	✓✓	✓✓	✓	✓✓	✓✓	-
IIAO 16	✓	✓	✓	✓	✓✓	✓	✓✓	✓✓
IIAO 17	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓
Avg.	57%	23%	50%	59%	68%	59%	68%	59%

London Bridge Area Vision						
IIA Objective	Description	Area wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	On employment sites the re-provision of at least the equivalent level of employment floorspace or 50% of the sites total development capacity is safeguarded, whichever is greater. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Site allocations for the most part allow for the delivery of flexible workspace to provide a diverse range of employment opportunities. Further curation of the employment offer would help manage the risk of creating a one-dimensional local economy and ensure job opportunities are accessible to all. Town centre uses and active frontages proposed across many of the sites within the vision area should create a vibrant urban area which capitalises upon the thriving tourism industry of London Bridge, thus helping to generate a more diverse supply of local employment opportunities. Minor modifications have been added to provide clarification on the growth areas within London Bridge.
IIAO 2	To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	Provision of research and education facilities alongside the London Bridge Health Cluster (NSP49) will create a more skilled and educated population. Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓✓	✓	✓✓	✓✓	Enhancement of the low-line walking route, green links and planned cycle networks will promote active lifestyles and help reduce the causes and exposure to poor air quality. High density development expected will free up space and routes between building plots to improve legibility and promote social interaction through the provision of new public spaces, such as one expected at NSP51. More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant. Delivery and enhancement of the London Bridge Health Cluster (NSP49) will ensure sufficient, accessible and higher quality primary and community health services for a growing population.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	✓	✓	New public spaces (NSP51) and the vibrant mix of uses proposed delivered across the site allocations will create hubs of activity which draw together a variety of groups to promote social cohesion and improve safety. High quality and inclusive public realm enhancements, accessible to all groups will promote a sense of community.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	-	✓	✓	High quality and inclusive public realm enhancements will be accessible to all groups. Low-line, green links and planned cycle ways will create a more legible urban environment to avoid physical barriers and issues of severance. New public spaces (NSP51) and the vibrant mix of uses proposed delivered across the site allocations will create hubs of activity which draw together a variety of groups to promote social cohesion.
IIAO 6	To reduce contributions to climate change	?	?	-	✓	Low-line, green links and planned cycle ways will promote active transport and sustainable modes, improving air quality and reducing greenhouse gas emissions. Higher densities anticipated will release pockets of space between buildings for landscape enhancements to encourage urban greening and adapt to the effects of climate change, reducing the urban heat island effect. Despite

						excellent public transport links, London Bridge experiences some of the most heavily congested roads in the borough – CO2 emissions suffer as a result and these could be exacerbated by accelerated levels of construction and demolition. NSP policies seek to minimise carbon dioxide emissions from development to offset this impact. The area vision identifies London Bridge as a place where development should delivery greenery and innovations in environmental resilience incorporated into buildings. This will help mitigate the impacts of climate change.
IIAO 7	To improve the air quality	?	?	-	✓	Low-line, green links and planned cycle ways will promote active transport modes, helping to address the causes of poor air quality. Air quality in the area suffers as a result of heavy congestion around London Bridge; this could be exacerbated by accelerated levels of construction and demolition. NSP policies requires development to meet air quality neutral standards and improve air quality
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	All site allocations promote the re-use of previously developed sites and may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to fewer largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	-	✓	✓✓	Development will be respectful to the designations of conservation areas and strategic viewing corridors where they apply. All existing green space is due to be retained and the additional public space provided at NSP51 and green linkages proposed will encourage urban greening and landscape enhancements. Enhanced high-quality public realm should provide for a much improved townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant. Development will be sensitive to the historical significance of London Bridge and Borough High Street.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	Limited opportunities to enhance biodiversity and greenspace due to the sub-areas density. All existing open space is due to be retained whilst new public space proposed at NSP51 along with green links these will encourage urban greening and landscape enhancements in the ecology restoration zones (River Thames Restoration Zone and Red Cross Gardens - and surrounds Restoration Zone).
IIAO 14	To reduce vulnerability to flooding	✓	✓	✓	✓	Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. The sub-area falls within a Critical Drainage Area and therefore the impact of substantial development falling within this area would need to be closely investigated to ensure they will not significantly increase the risk of flooding elsewhere. Proposals for multiple developments within a concentrated area could be further investigated to assess their cumulative impact and determine whether any strategic measures to

						manage surface water could be encouraged. NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	The area vision and site allocations should deliver a significant number of new homes across the area. If these are delivered to policy requirements they will offer a range of different units and tenures which will provide for a range of different needs and create inclusive residential schemes accessible to all groups.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	✓	✓	The vision area already benefits from excellent public transport connections, supporting the intensification of development. Low-line, green links, planned cycle ways and station access improvements will further promote active transport modes.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	Delivery and enhancement of London Bridge Health Cluster (NSP49) will provide education and research facilities which will improve skills leading to job opportunities as well as ensuring sufficient, accessible and higher quality primary and community health services for a growing population. Green links will enhance connectivity across the sub-area, promoting healthy lifestyles and improving access to services. All existing open space is due to be retained and an additional open space provided south-west of NSP51 to create more opportunities for leisure and social interaction.

NSP49 - London Bridge Health Cluster				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Town centre uses within this site should create a vibrant urban area, which capitalises upon the thriving tourism industry of London Bridge, thus helping to generate a more diverse supply of local employment opportunities. Provision of research and education facilities to support the functioning of London Bridge Health cluster will create a more skilled and educated population, resulting in a greater proportion of higher paid jobs in time.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Provision of research and education facilities within this site will create a more skilled and educated population. Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
			✓✓	The redevelopment may provide student housing (sui generis) where this is directly linked to nominations from the hospital, which would support education and skills of the population.
IIAO 3	To improve the health of the population	✓✓	✓✓	Delivery and enhancement of the London Bridge Health Cluster will ensure sufficient, accessible and higher quality primary and community health services for a growing population. Ancillary uses which would complement the health cluster (C2, D1) may also emerge which would support the provision of health.
			✓✓	Developments will improve pedestrian movement and permeability through the site. This will promote opportunities for more sustainable modes of transport such as walking.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours. This emerges where the proposed future redevelopment provides for the needs of visitors, pedestrians and the surrounding workforce through the provision of ancillary uses, including town centre uses and offices (A1, A2, A3, A4, B1);
			✓✓	Improve pedestrian movement and permeability through the site, will increase natural surveillance reducing fear of crime in the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The redevelopment may provide student housing (sui generis) where this is directly linked to bringing in new population demographics and increasing diversity within the area.
			✓✓	Improve pedestrian movement and permeability through the site will allow more people to move through the site, including vulnerable people such as elderly, or persons who require disability friendly access.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Improving pedestrian movement and permeability around the site is valuable in supporting active travel and walking which has the potential to encourage a reduction in climate change. By reducing the intensity of carbon emissions released in a certain area contributes to better air quality.
IIAO 7	To improve the air quality	✓✓	✓✓	A more walkable streetscape will improve and encourage active travel this in turn should improve the air quality, through the reduction of carbon emissions
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	Redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. The scale of any new buildings should step down towards the site boundaries. More permeable movement through the site should improve the visible townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site contains the Grade II* listed Guys Hospital main building, including wings and chapel, and affects the settings of numerous listed buildings on Borough High Street and St Thomas Street, including the Grade I listed The George Inn. Redevelopment of the site may affect the setting of Grade I listed Southwark Cathedral and the important unlisted building The Shard. All redevelopment should retain and enhance heritage assets within and outside the site allocation. The site lies partially within the Borough High Street Conservation Area to the west and is adjacent to the Bermondsey Conservation Area to the east. Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open	✓	✓	The site is in proximity to Guy Street Park (Borough Open Land). This will be retained in any proposed development.

	spaces, green corridors and biodiversity			
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 Analysis4) will have a more vulnerable use (mixed use including health centre, research/education, town centre and student housing) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The proposed uses should create a vibrant urban area and will generate more diverse supply of local employment opportunities;</li> <li>- The proposed uses will create a more skilled and educated population and a greater proportion of higher paid jobs in time;</li> <li>- The proposed uses will support higher quality primary and community health services for a growing population; and</li> <li>- The requirement to improve pedestrian movement and permeability through the site will enhance connectivity across the area, promoting healthy lifestyles and improving access to services;</li> <li>- The requirement to improve pedestrian movement and permeability through the site will enhance connectivity across the area, promoting healthy lifestyles and improving access to services;</li> <li>- The proposed uses may include student accommodation for people with direct links to the hospital.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓	✓	Provision of student housing will encourage homes of a difficult to reach demographic.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The site allocation already benefits from excellent public transport connections, supporting the intensification of development. The requirement to improve pedestrian movement and permeability through the site will further promote active transport modes.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The requirement to improve pedestrian movement and permeability through the site will enhance connectivity across the area, promoting healthy lifestyles and improving access to services.

**NSP50 - Land between Melior Street, St Thomas Street, Weston Street and Fenning Street**

<b>IIA Objectives</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	On employment sites the re-provision of at least the equivalent level of employment floorspace or 50% of the sites total development capacity is safeguarded, whichever is greater. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Town centre uses and active frontages proposed within this site should create a vibrant urban area which capitalises upon the thriving tourism industry of London Bridge, thus helping to generate a more diverse supply of local employment opportunities.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
<b>IIAO 4</b>	To reduce the incidence of	✓✓	✓✓	The area is currently well-served by public transport. Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents.
				Increases in active frontages will encourage neighbourhood surveillance, which will improve feelings of safety in the area.

	crime and the fear of crime		✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The provision of a variety of town centre uses at ground floor level, including community uses would be particularly suitable and it would benefit new and existing residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction. The site allocation encourages community and leisure uses which are crucial to promoting social inclusion and community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion.
IIAO 6	To reduce contributions to climate change	-	-	The substantial demolition and construction may generate greenhouse gases, however NSP policies seek to minimise carbon dioxide emissions from development in order of with energy hierarchy and in compliance with sustainability standards.
IIAO 7	To improve the air quality	-	-	The site allocation does not specifically contribute to the objective however NSP policies require development to meet air neutral standards.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	The site will provide employment floorspace and community uses additional to the existing quantum of 15,185m <sup>2</sup> offices (B1) This could improve the townscape use from the existing condition. Any redevelopment should contribute towards an active, new high street between Borough High Street and Bermondsey Street. Any redevelopment should provide public realm enhancements, to offer spaces for meeting, and informal recreation, to allow visitors to explore and enjoy the area. The approach to tall buildings protects the view towards the Shard and the Shard as a landmark in Southwark, as well as the quality of the surrounding landscape and townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	Site is directly adjacent to Grade II listed London Bridge Station and Grade II listed Railway Arches. Proposals for the site should sustain and enhance the setting of these assets and integrate St Thomas Street Boulevard. Proposals for the site should be sensitive to the surrounding context, and sustain and enhance the setting of the Bermondsey Street conservation area to the east.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site contains Melior Street Community Garden (Other Open Space). This will be preserved with any future redevelopment. Minor modifications have been made to the site allocation to highlight this in existing uses.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (in SFRA level 2 -Analysis 4) will have a more vulnerable use (mixed use including employment, town centre and residential uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area which capitalises upon the thriving tourism industry of London Bridge, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- Any redevelopment should provide public realm enhancements, to offer spaces for meeting, and informal recreation, to allow visitors to explore and enjoy the area;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape.</li> </ul>

				<p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>Application 18/AP/0900 is relevant to this site allocation, as planning permission has been granted subject to S106 legal agreement. A Flood Risk Assessment was submitted with the application and considered in the decision making process. Any development on the remainder of the site will be subject to the aforementioned requirements to manage and mitigate flood risks.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
			✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	Any redevelopment should contribute towards an active, new high street between Borough High Street and Bermondsey Street. Any redevelopment should provide public realm enhancements, to offer spaces for meeting, and informal recreation, to allow visitors to explore and enjoy the area. This could bring more traffic to site unless accounted for.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The scheme could provide D uses on site which could include community and leisure facilities for the community at large; this can help to encourage more community interaction and community cohesion.

NSP51 - Land between St Thomas Street, Fenning Street, Melior Place, and Snowsfields				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	On employment sites the re-provision of at least the equivalent level of employment floorspace or 50% of the sites total development capacity is safeguarded, whichever is greater. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Town centre uses and active frontages proposed within this site should create a vibrant urban area which capitalises upon the thriving tourism industry of London Bridge, thus helping to generate a more diverse supply of local employment opportunities.
IIAO 2	To improve the education and skill of the population	✓	✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunity for more families and individuals to reside in a prime location in the borough, near to employment opportunities.
			✓✓	New walking routes, such as the site's north-south green link from Melior Place to St Thomas Street, will encourage walking and cycling to support the health and well-being of the population.
			✓✓	Increases in active frontages will encourage neighbourhood surveillance, which will improve feelings of safety in the area.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
			✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring "eyes on the streets" to improve the perception of safety and discourage offensive and criminal behaviours.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The site allocation proposes the creation of a new large open space. This will mitigate the pressure from development on existing open space and add to a sense of arrival to the neighbourhood, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	New community facilities will improve opportunities for social interaction and social cohesion in the area.
			✓✓	To provide new open space of at least 15% of the site area supports the current area (London Bridge) which is deficient in parks and other green spaces. New open spaces will provide an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialisation, nature conservation, food growing and cultural events. This will support community activities which encourage social inclusion, equality, diversity and community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	New walking routes, such as the site's north-south green link from Melior Place to St Thomas Street, will encourage community interaction, equality and ease of accessibility throughout the area.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	The provision of open space is valuable in supporting active travel and walking which has the potential to encourage a deceleration in climate change. By reducing the intensity of carbon emissions released in a certain area contributes to better air quality.
IIAO 7	To improve the air quality	✓✓	✓✓	A more walkable streetscape will improve and encourage active travel. New Open space further reduces the intensification of the land use and should improve the air quality, as well supporting biodiversity.
			✓✓	The increased provision of open space will help absorb negative CO2 emissions and this will contribute to better air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. Taller buildings should be towards the west of the site and should not detract from the primacy of The Shard. The approach to tall buildings protects the view towards the Shard and the Shard as a landmark in Southwark, as well as the quality of the surrounding landscape and townscape.
			✓	New open space is seen to enhance the new high street on St Thomas Street and the setting of the Leather Warehouse and Horseshoe Pub.

IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is within the setting of the Grade II listed Railway Arches. The site includes an important unlisted building, The Leather Warehouse, which makes a positive contribution to the area. The site is also within the setting of the important unlisted Horseshoe Pub. Redevelopment should enhance the setting of these buildings. Development proposals should retain and enhance the townscape setting provided by key heritage assets and complement local character and distinctiveness. The urban grain and street layout of the surrounding area should be retained. The site lies partially within the Bermondsey Street Conservation Area.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	To provide new open space of at least 15% of the site area supports the current area (London Bridge) will mitigate the pressure from development on existing open space. The site is large enough to accommodate a meaningful open space at an achievable level and it will mark an arrival point into Southwark.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The site is in proximity to Melior Street Community Garden (Other Open Space). These will be preserved with future development.</p> <p>The sequential test confirms that the site (in SFRA level 2- Analysis 22) will have a more vulnerable use (mixed use including employment, town centre and residential uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and an uplift in employment space which will provide training in construction and in the final development. This will lead to increased local job opportunities and will contribute to tackle poverty;</li> <li>- Various economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough. By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing. It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people;</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health;</li> <li>- Town centre uses and active frontages proposed within this site should create a vibrant urban area which capitalises upon the thriving tourism industry of London Bridge, thus helping to generate a more diverse supply of local employment opportunities;</li> <li>- Bringing retail use to the area will provide more shops, retail and public spaces in closer proximity to local residents. Active frontages will encourage interaction and usage amongst the local community, which will improve the character or 'feel' of the neighbourhood, and thereby influence community cohesion and social interaction;</li> <li>- Any redevelopment should provide public realm enhancements, to offer spaces for meeting, and informal recreation, to allow visitors to explore and enjoy the area;</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape.</li> </ul> <p>-</p> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	ü✓	✓✓	<p>Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.</p> <p>It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.</p> <ul style="list-style-type: none"> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement</li> </ul> <p>A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p> <p>By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.</p>

<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The site allocation already benefits from excellent public transport connections supporting the intensification of development. The requirement of providing a new north-south green link from Melior Place to St Thomas Street and the possibility of providing low line walking routes will further promote active transport modes.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	All existing open space is due to be retained and an additional open space provided south-west of the site allocation will create more opportunities for leisure and social interaction. The requirement to provide a new north-south green link from Melior Place to St Thomas Street and the possibility of providing low line walking routes will improve pedestrian movement and permeability through the site which will enhance connectivity across the area, promoting healthy lifestyles and improving access to services.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP52 - Colechurch House, London Bridge Walk**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	On employment sites the re-provision of at least the equivalent level of employment floorspace or 50% of the sites total development capacity is safeguarded, whichever is greater. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Town centre uses and active frontages proposed within this site should create a vibrant urban area which capitalises upon the thriving tourism industry of London Bridge, thus helping to generate a more diverse supply of local employment opportunities.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	Under NSP policies significant levels of construction and uplift in employment space will provide training in construction and in the final development.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	By improving the walking environment which links to London Bridge and the Thames Path, cycling and walking will be supported which encourages the health and well-being of the local population.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	By improving the walking environment which links to London Bridge and the Thames Path, the incidence of crime should be reduced and the fear of crime as people benefit from a more legible streetscape with natural surveillance.
			✓✓	Town centre uses and the walking routes will encourage a high level of footfall to the area, which will positively bring “eyes on the streets” to improve the perception of safety and discourage offensive and criminal behaviours.
			✓✓	Increases in active frontages will encourage neighbourhood surveillance, which will improve feelings of safety in the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Improved town centre uses should encourage more people to shop locally within their area, which will improve the character or ‘feel’ of the neighbourhood, and thereby influence community cohesion and social interaction.
			✓✓	Providing new homes is required for redevelopment of the site. If socially rented, this will provide opportunity for more families and individuals to reside in a prime location in the borough, near to employment opportunities.
			✓✓	Improved walking spaces should support community cohesion in the area.
			✓✓	New community facilities will improve opportunities for social interaction and social cohesion in the area. The site allocation encourages community and leisure uses which are crucial to promoting social inclusion and community cohesion.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	Improving pedestrian movement and permeability around the site is valuable in supporting active travel and walking which has the potential to encourage a reduction in climate change. By reducing the intensity of carbon emissions released in a certain area contributes to better air quality
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	A more walkable streetscape will improve and encourage active travel this in turn should improve the air quality, through the reduction of carbon emissions
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.

IIO 11	To protect and enhance quality of landscape and townscape	✓	✓	Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. Taller buildings should not detract from the primacy of The Shard. Redevelopment must be sensitive to the Thames Policy Area, where building heights should be lower in closer proximity to the River Thames.
IIO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is within the settings of a number of listed buildings including Grade II* listed St Olaf House and Grade II listed London Bridge Hospital. Redevelopment has the potential to affect the setting of Grade I listed Southwark Cathedral and the important unlisted landmark The Shard. The site lies between the Borough High Street and Tooley Street Conservation Areas. Development that comes forward must work to protect and enhance this setting.
IIO 13	To protect and enhance open spaces, green corridors and biodiversity	-	-	The site is not in the proximity of a designated open area.
IIO 14	To reduce vulnerability to flooding	✓	✓	<p>The site (in SFRA level 2 , Analysis 3) passes the sequential test which confirms 'Less Vulnerable' development (mixed use including employment and town centre uses) is permitted in the Flood Zone 3.</p> <p>For any development proposals on site, recommendations are also set out in the report to manage surface water flood risk coming with the constrained sewer capacity under higher return period events, including SuDS to restrict post-development runoff to greenfield rates.</p> <p>When a planning application is submitted on the site, a site-specific FRA will be required to demonstrate that the development will be safe during its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>SFRA recommendations:</p> <ul style="list-style-type: none"> <li>• No basement dwellings should be permitted within this area. Basement thresholds must be raised above the 2100 maximum water level, anticipated through breach of the River Thames defences. Internal access to upper floors must be provided and flood resilient design and construction techniques employed. Any development proposals incorporating new or extended basement areas must be accompanied by a Basement Impact Assessment, demonstrating that the development will be safe from a flood risk perspective and will not have any adverse impacts on local hydrogeology.</li> <li>• Residential Finished Floor Levels should be situated 300 mm above the 2100 year maximum water level anticipated through a breach of the River Thames defences.</li> <li>• Site specific emergency evacuation procedures should be established to ensure that the risk to life is minimised should a breach of the River Thames defences occur. Safe access and egress routes should be provided above the 2100 breach flood level and lead to higher ground within Flood Zone 1. For residential developments where this is not feasible, a dedicated 'safe haven' can be provided above the flood level to enable rapid escape should defence failure occur. This may be provided in the form of a sheltered communal space within the building, accessed via internal stairs and sufficient in size to safely house all residents.</li> <li>• Flood resilient construction techniques should be employed to reduce damage and increase the speed of recovery should any flooding events occur.</li> <li>• Sewer capacity within Southwark is known to be constrained under higher return period events. Some sites are located within or near to a Critical Drainage Area and therefore robust surface water management will be critical. SuDS should be implemented to manage surface water flood risk and restrict post-development runoff to greenfield rates. Geological data suggests that the majority of development sites are potentially suitable for bespoke infiltration SuDS; which should be prioritised where possible. SuDS selection and design should be in accordance with the sustainable drainage hierarchy and provide sufficient capacity to cater for up to the 1 in 100 year storm event, incorporating the latest guidance regarding climate change. Proposals for infiltration SuDS should be supported by site specific permeability testing.</li> <li>• Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</li> <li>• For development sites located adjacent to the River Thames a 16 m buffer strip must be maintained along the river corridor. Demonstration will be required that the associated flood defences will be safe over the lifetime of the development, including any required maintenance and improvements. Consideration should be given to the recommendations of the TE2100 plan and advice sought from the EA at an early stage.</li> </ul>
IIO 15	To provide everyone with the opportunity to live in a decent home	-	-	No new homes proposed.
IIO 16	To promote sustainable transport and minimise the need	✓✓	✓✓	By improving the walking environment which links to London Bridge and the Thames Path, cycling and walking will be supported which encourages sustainable travel.

	to travel by car			
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	✓	Walking infrastructure is valuable to support active travel and walking.

**Integrated Impact Assessment for:**  
**Nunhead Area Vision (no site allocations)**

IIAO	Description	Nunhead			
		Area wide	S	M	L
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	✓	-
IIAO 2	To improve the education and skill of the population	-	-	-	-
IIAO 3	To improve the health of the population	✓	-	✓	✓
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	-	-
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	-	✓	✓
IIAO 6	To reduce contributions to climate change	✓	-	✓	✓
IIAO 7	To improve the air quality	✓	-	✓	✓
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-
IIAO 9	To encourage sustainable use of water resources	-	-	-	-
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	-	✓	✓✓
IIAO 14	To reduce vulnerability to flooding	✓	-	✓	✓
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓	✓	✓	✓
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	-	-	✓
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓	-	-	✓
<b>Avg.</b>		<b>38%</b>	<b>9%</b>	<b>29%</b>	<b>59%</b>

**Integrated Impact Assessment for:**  
**Nunhead Area Vision (no site allocations)**

Nunhead Area Vision (no site allocations)						
IIA Objective	Description	Area wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	✓	-	Development should complement and improve the town centre offer at Evelina Road, Forest Hill Road and Cheltenham Road, including the retention of small shops to provide a broad range of employment opportunities. The limited detailed provision of additional employment floorspace is unlikely to provide a significant uplift in local job opportunities.
IIAO 2	To improve the education and skill of the population	-	-	-	-	The lack of employment space or education provision identified is unlikely to significantly improve education or level of skilled workers in Dulwich, although the relative prosperity of the area perhaps does not demonstrate a considerable need.
IIAO 3	To improve the health of the population	✓	-	✓	✓	Enhancement of green links and planned cycle networks will promote active lifestyles and help reduce the causes and exposure to poor air quality. The suburban density zone provides significant amounts of open space for leisure and recreation to encourage social interaction and healthy lifestyles.
IIAO 4	To reduce the incidence of crime and the fear of crime	-	-	-	-	Nunhead benefits from comparatively low-levels of crime and deprivation. Improved permeability and activation of frontages in along Evelina Road and Forest Hill Road will promote social interaction and the feeling of public safety. High quality and inclusive public realm enhancement accessible to all groups will promote an enhanced sense of community.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	-	✓	✓	Green links and planned cycle ways will create a more legible urban environment to avoid physical barriers and address issues of severance. A revitalised centre for Nunhead village will create more opportunities for social interaction.
IIAO 6	To reduce contributions to climate change	✓	-	✓	✓	Green links and planned cycle ways will promote active transport and sustainable modes, improving air quality and reducing greenhouse gas emissions. Nunhead benefits from substantial existing greenspace which mitigate the effects of climate change and urban heat island effect. Enhanced green linkages will increase ecological resilience of the Cemeteries centred around Peckham Rye Park core habitat area. NSP policies seek to minimise carbon dioxide emissions arising from development.
IIAO 7	To improve the air quality	✓	-	✓	✓	Green links and planned cycle ways will promote active transport modes, helping to address the causes of poor air quality. Air quality in the area is generally good benefitting from the lower densities and extensive greenspace. NSP policies requires development to meet air quality neutral standards and improve air quality Priority of walking, cycling and public transport will reduce pressure on car parking and improve accessibility, thus reducing reliance on the private car.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	NSP policies require adequate management of waste arising from construction and intensified development in accordance with the waste management hierarchy. The minor amount of development proposed is unlikely to have a comparatively significant impact upon waste arising from development and demolition.
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	The comparatively minor uplift in employment and residential floorspace is unlikely to place significant additional pressures on the water network. Development comes with the potential for water-recycling and sustainable water measures. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	As a predominantly low density residential suburb Nunhead benefits from high quality ground conditions. The extensive open space and greenspace assets of Nunhead will be retained and

						proposed green links will improve ground conditions.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	Development will be respectful to the designations of conservation areas where they apply. All existing open space is to be retained and the greenspace of Nunhead enhanced by green linkages creating a more legible environment. All development sites will be sensitive to their respective character setting and will seek to enhance the environment they are situated within.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	-	✓	✓✓	The thriving biodiversity and existing open space of Nunhead is to be retained and greenspace enhanced by green linkages, creating a more legible environment and green corridors to support biodiversity, in particular the ecological resilience of Cemetery's centred around Peckham Rye Park core habitat area.
IIAO 14	To reduce vulnerability to flooding	-	-	-	-	The majority of the sub-area falls within Critical Drainage Area, however the minor level of development anticipated is unlikely to have a significant impact upon flood risk or increasing the risk of flooding elsewhere. NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓	✓	✓	✓	Whilst development opportunities in Nunhead are relatively limited, the sub area has the potential to contribute towards meeting Southwark's housing need. Most new homes will be built on infill sites. If these are delivered to policy requirements they will offer a range of different units and tenures which will provide for a range of different needs and create inclusive residential schemes accessible to all groups.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	-	-	✓	Green links and planned cycle ways will promote active transport modes and reduce reliance on the private car.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓	-	-	✓	The extensive open space and greenspace assets of Nunhead will be retained and proposed green links will create a more legible and connected environment to improve accessibility to services for the local community.

Integrated impact assessment for

**AV13 Old Kent Road sites**

Including:

- NSP 53: Bricklayers Arms
- NSP 54: Crimscott Street and Pages Walk
- NSP 55: Mandela Way
- NSP 56: 107 Dunton Road (Tesco store and car park) and Southernwood Retail Park
- NSP 57: Salisbury estate car park
- NSP 58: 96-120 Old Kent Road (Lidl store)
- NSP 59: Former petrol filling station, 233-247 Old Kent Road
- NSP 60: Kinglake Street Garages
- NSP 61: 4/12 Albany Road
- NSP 62: Former Southern Railway Stables
- NSP 63: Land bounded by Glengall Road, Latona Road and Old Kent Road
- NSP 64: Marlborough Grove and St James's Road
- NSP 65: Sandgate Street and Verney Road
- NSP 66: Devon Street and Sylvan Grove
- NSP 67: Hatcham Road, Penarth Street and Ilderton Road
- NSP 68: 760 and 812 Old Kent Road (Toyrus store) and 840 Old Kent Road (Aldi store)
- NSP 69: 684-698 Old Kent Road (Kwikfit garage)
- NSP 70: 636 Old Kent Road

	AV13																						
	Area wide	S	M	L	NSP53	NSP54	NSP55	NSP56	NSP57	NSP58	NSP59	NSP60	NSP61	NSP62	NSP63	NSP64	NSP65	NSP66	NSP67	NSP68	NSP69	NSP70	
IIAO 1	✓✓	-	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 2	✓	-	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 3	✓✓	-	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 4	✓✓	-	✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 5	✓	-	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 6	-	x	-	-	✓✓	✓	✓✓	✓✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 7	✓	✓	✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 8	✓	-	✓	✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 9	?	?	?	?	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 10	✓	✓	✓	✓✓	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 11	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓✓	-	✓	✓✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓	✓
IIAO 12	✓	✓	✓	✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 13	✓	✓	✓	✓	✓	✓✓	✓✓	✓✓	-	✓	✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓	✓
IIAO 14	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 15	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 16	✓✓	✓	✓	✓✓	✓✓	✓	✓✓	✓✓	✓	✓	✓	✓✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IIAO 17	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓
Avg.	69%	25%	53%	81%	77%	68%	71%	74%	65%	59%	56%	71%	62%	65%	68%	68%	68%	68%	68%	62%	62%	59%	

**Integrated Impact Assessment for:**

**AV13 Old Kent Road Area Vision and site allocations NSP53 – 70 as follows:**

Old Kent Road Area Vision						
IIA Objective	Description	Area wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	-	✓	✓✓	The vision for the future of the Old Kent Road sets out a long term strategy that will help to tackle poverty and encourage wealth creation. The area vision sets out how the area will see an increase in the number of jobs by 10,000 by requiring new business floorspace across the majority of site allocations as well as providing new and improved town centre uses on the Old Kent Road frontage to enhance the road's town centre and high street functions. There will be job opportunities benefiting groups such as young people through apprenticeships, the unemployed and low-income groups improving levels of deprivation. Due to the large scale of change being planned through the area vision, site allocations and related draft Area Action Plan, many sites have the potential to impact on small and independent business owners who provide vital local employment. The NSP ensures that the impact of any redevelopment affecting such businesses will be reprovided for as a priority, and where not possible will be aided through a relocation strategy. The vision will help to improve local facilities and public transport in the area lowering costs for residents and requiring less need to travel further afield for shopping, community, health and leisure facilities. This would benefit many groups including disabled people, pregnant women and young adults. Several site allocations (NSP56, NSP63, NSP64, NSP65 and NSP66) require community uses, and a large proportion of the other site allocations prescribe this as an acceptable use on the site. This should lead to better provision of facilities for those on low incomes or with specialist needs such as alcohol and drug problems, people who experience domestic violence or people with a long-term illness.
IIAO 2	To improve the education and skill of the population	✓	-	✓	✓✓	There would be more opportunities for training and apprenticeships as a result of new development and new jobs in mixed use neighbourhoods as well as the impact of NSP policies requiring employment and training for local people in the construction and completed phases of the schemes. Redevelopment of industrial land would bring change in the type of jobs available and improve the floorspace to jobs ratio however it would be important to maintain industries which service central London and contribute to the current function of the vision area as an industrial area. Black and minority ethnic groups are strongly represented in the population statistics for the area and improved access to education or new skills would have a positive impact on young people in these groups and young people in general as well as the unemployed and those on low incomes. Some site allocations have been identified as being suitable for providing new education uses (NSP55 and NSP65) or providing improvements to existing educational facilities (NSP62 and NSP67).
IIAO 3	To improve the health of the population	✓✓	-	✓	✓✓	The vision incorporates a place-making approach including new health facilities, new green spaces and leisure facilities which can help decrease lifestyle risk factors such as smoking, poor diet, substance misuse and lack of exercise. Poor health can be exacerbated by socio-economic challenges such as poor housing and unemployment and the vision anticipates significant improvements to the area. Improvements to access to health facilities, better quality housing, employment opportunities, better public transport and new green spaces would improve physical and mental health. Improving connectivity and green routes lessens to the impact of vehicular pollutants and better air quality and would particularly benefit disabled people and pregnant women.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	-	✓	✓✓	The relatively high levels of deprivation in the area highlight particular issues in income and crime levels. Young single people aged 18-35 in rented accommodation are more likely to be victims of high rates of crime. Improvements to public transport accessibility, new and safer routes and safety features would significantly reduce the risk of crime. Introducing residential areas and new streets to existing large scale and quiet industrial areas would improve the amount of footfall and overlooking

						of public areas improving public realm and safety.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	-	-	✓✓	The vision area has a number of existing community networks and a diverse population. There are high numbers of faith premises in the area which benefit many religious groups. The vision includes reinforcing healthy and sustainable neighbourhoods and the CAZ functions emphasise the importance of cultural functions in central London. The requirement for the provision of new community space across several site allocation (NSP56, NSP63, NSP64, NSP65 and NSP66) and other site allocations prescribe this as an acceptable use on the site will provide facilities that would be suited to a range of groups. The site allocations and area vision require provision of town centre uses and new open space (NSP56, NSP62, NSP63, NSP64, NSP65, NSP66 and NSP67) to improving areas in which people can meet, in formal and informal settings, such as outdoor public spaces, restaurants, cafes, pubs, faith premises and community halls. The redevelopment opportunities will reduce physical barriers and severance improving the layout of the streets and promoting social interaction.
IIAO 6	To reduce contributions to climate change	-	x	-	-	The intensity of development will incur a significant increase in demand for resources which will impact on contributions to climate change. However, the area has been designated by the Mayor of London as an 'opportunity area' in the London Plan. This means the opportunity area has been identified as an area that can accommodate some of London's much needed new homes and spaces to deliver new jobs. The area was designated by the Mayor due to recognising that, relative to its position to central London (and therefore the central London jobs market) the land around the Old Kent Road could accommodate many more different uses at a higher density in addition to what is currently in the area. Therefore the high level of growth anticipated is due to the overwhelming social, economic and environmental sustainability benefits of locating new homes and jobs in high density, mixed use, walkable neighbourhoods compared to trying to accommodate the same amount of growth in car-based urban sprawl or building on open green spaces. The NSP will seek to mitigate, offset and carefully manage the demand on resources that the level of growth in the area will cause. As part of the related draft Area Action Plan, the council has already undertaken studies developed strategies for utilities, energy and flood risk and water management to inform policies in the AAP. New underground stations (potentially located at NSP56 and NSP68) and improved surface transport including electric buses and improved cycling infrastructure would reduce the reliance on the private car reducing emissions from vehicles. New walking and cycling routes would also be provided improving sustainable modes of transport. Extensive new open spaces provided as part of NSP56, NSP62, NSP63, NSP64, NSP65 NSP66 and NSP67 will also help to improve the health of the population by reducing exposure to pollutants and harmful emissions from industry, traffic and domestic life.
IIAO 7	To improve the air quality	✓	✓	✓	✓✓	The vision encourages a reduction in the number of journeys made by car by specifying development will be car-free and through the introduction of the Bakerloo Line Extension and new underground stations (potentially located at NSP56 and NSP68), as well as significant improvements to the walking and cycling network and surface transport. The introduction of electric buses and improved cycling infrastructure would improve air quality in the area and car journeys will further be reduced through car-free development, although the Old Kent Road will remain a key vehicular route in and out of London. Improvements to air quality and less exposure to vehicular and industrial emissions will improve the health of the population particularly older people, children, pregnant women, people with a long-term illness and the homeless. NSP policies requires development to meet air quality neutral standards and improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	-	✓	✓	The New Southwark Plan provides a conditional safeguarding designation to the operational Integrated Waste Management Facility which provides capacity for processing much of Southwark's and surrounding borough's municipal waste and recycling functions. The facility includes several sustainable waste processing streams including supplying the South East London Combined Heat and Power (SELCHP) plant, located close by in the London Borough of Lewisham, with waste materials to be used as low carbon energy sources. However, the amount of development envisaged would increase the pressures on waste and recycling. The waste disposal and recycling facilities for commercial and residential development need to be carefully managed in mixed use

						schemes which will be secured through NSP policies.
IIAO 9	To encourage sustainable use of water resources	?	?	?	?	The demand for water and foul sewage disposal is likely to increase with significant levels of new development. The NSP encourages sustainable reuse of water and use of rainwater limiting the impact on surface and groundwater in new development. The sustainable use of water would benefit the health of the population. The increase waster demand and the subsequent discharge from new development into the combined sewer in the Old Kent Road Opportunity Area has the potential to contribute significantly to flood risk during high rainfall events. To mitigate and carefully manage this impact and potential risk, the council has prepared an Integrated Water Management Strategy which is due to be published as part of the draft Old Kent Road Area Action Plan 'further preferred option' imminently, which will set out how the Area Action Plan policy should require more stringent requirements for development to mitigate and manage this risk. NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	✓	✓✓	The vision area site allocations envisage effective use of land through reuse of previously developed land which would remediate issues of contamination which may affect many industrial sites identified in the site allocations around the vision area. Soil quality will improve with more opportunities for new green spaces. Remediation of the effects of contamination would have a positive impact on health, particularly on more vulnerable groups.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓	✓✓	✓✓	Improving the quality of townscape and landscape creating a new network of streets, improved connectivity and new green spaces is a strong part of the vision and site allocations, such as at the Bricklayers Arms Roundabout (NSP53) which requires the junction be re-modelled and improved for the purposes of pedestrian experience, convenience and place making. This would have significant public realm and townscape benefits for the local area. This would create opportunities to improve health and wellbeing and security, which could affect groups such as the homeless, women, older people and those with physical disabilities. The site allocations with a boundary onto the Old Kent Road frontage also seek to ensure town centre uses are provided, strengthening the road's role as a high street which requires to be stitched back together after previous development and land uses inhibiting this important function to provide a decent, safe and welcoming pedestrian environment and townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	✓	-	The vision sets out how development should sensitively incorporate heritage assets into high quality places and spaces at a scale and density which befits a central London location. Large scale regeneration would need to carefully consider impact on adjoining conservation areas and listed buildings and impact in the longer term. NSP66 requires the potential of the listed gasholder to be utilised as a heritage asset and structure for place making. The vision and site allocation NSP53 and others seek to promote new cultural, leisure and sports facilities through required and suggested D use classes, which would enhance the health of the population and provide facilities for children and young adults.  NSP 55 (Mandela Way); NSP 63 (Land bound by Glengall Road, Latona Road and Old Kent Road); NSP 67 (Hatcham and Iderton Road) specifies that development must provide strategic public open space. Open spaces are an essential resource to obtain health and wellbeing benefits, for residents and visitors, used for sports and other exercise, relaxation, socialising, nature conservation, food growing and cultural events.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	✓	✓	New green spaces, parks and green infrastructure provided are a major commitment of the vision, creating opportunities to improve biodiversity. The provision of green space has been well located and designed through the Old Kent Road Masterplan to benefit significant increases in population and use. The provision of green spaces would improve the long-term health and wellbeing of the population and may benefit children through provision of new play spaces. Significant new green space will be provided through NSP63, NSP64 and NSP65 which will form the proposed 'Surrey Canal Linear Park.' A large open space at NSP55 will also provide much needed green infrastructure. Several other site allocations (NSP56, NSP62 and NSP67) specify requirements for

						new open space which could be delivered as green space. The area vision provides the framework of 'the greener belt' to set out how the network of new and existing green open space and infrastructure will be delivered and improved.
IIAO 14	To reduce vulnerability to flooding	✓	✓	✓	✓	<p>The sites within the Old Kent Road area vision are within flood risk zone 3 benefitting from defences. This means that where more vulnerable sites are proposed, the exception test will be required to assess the benefits of the development and the flood risk mitigation measures proposed.</p> <p>Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures</p> <p>To further mitigate and carefully manage this impact and potential risk, the council has published an Integrated Water Management Strategy as part of the draft Old Kent Road Area Action Plan.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	The vision includes the ambitious housing strategy which will significantly improve the supply in Southwark and help meet local housing need as well as providing new affordable homes. High quality design of the public realm in residential schemes will also improve living conditions. There will need to be careful management of mixed use neighbourhoods so that other uses such as employment, leisure, retail, education or community uses combined with residential remain compatible and appropriately managed. Providing good quality housing benefits the health and wellbeing for many groups including families, children and older people, and people with specialist needs such as those with learning or physical disabilities.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓	✓	✓✓	The issuing of the safeguarding direction for the Bakerloo Line Extension from the Department of Transport signifies confidence from national government in bringing sustainable transport to the area. The significant improvements to the public transport network envisaged in the area vision and site allocations would reduce the need to travel by car through the Bakerloo Line Extension and new underground stations (identified as being potentially located on NSP56 and NSP68), improved walking and cycling routes and improved surface transport and buses. Improvements to crossing points and pedestrian connectivity along the Old Kent Road as well as better management of surface transport and junctions will reduce road traffic accidents. This should significantly improve the health and safety of local people, such as older people and children who are more likely to be involved in road traffic accidents. Better accessibility will also benefit groups such as people on low income, the unemployed, residents, disabled people and older adults.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	Large scale infrastructure improvements to transport, green space and community facilities would be provided to support revitalised neighbourhoods. This would benefit all groups and improve accessibility to health and social facilities.

**NSP53: Bricklayers Arms**

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices and retail. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The site will enable skills to be developed amongst workers employed to undertake the construction of new homes as well as skills developed in the town centre, employment and community establishments that the development will provide.
IIAO 3	To improve the health of the population	✓✓	✓✓	The redevelopment will also bring forward positive impacts in walkability and connectivity with the provision of green pedestrian links, promoting active lifestyle and mental well-being. The redevelopment will also draw on its proximity to open water and green spaces, including Surrey Water and Deal Porters Walk, to promote the access to the open space.
			✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is a key determinant of health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The site will provide new leisure, arts, culture or community uses which should help encourage more community interaction with different groups within the local area, providing more awareness of the diverse groups living within the area and encouraging community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and the requirement for a mix of tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	The improved connectivity and walkability within the site and with the wider area promotes active travel modes including walking and cycling, thus reducing the reliance on private vehicles and lowering the use of fossil fuels. Although demand for building materials and construction waste will be generated with redevelopment, the NSP policies will ensure the development to achieve carbon neutral through thoughtful design and offset contributions.
IIAO 7	To improve the air quality	✓✓	✓✓	Priority given to walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality. In addition, several NSP policies require development to meet air quality neutral standards and improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.

IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	<p>Improving the quality of townscape and landscape creating a new network of streets, improved connectivity and new green spaces is a strong part of this site allocation in requiring the junction to be re-modelled and improved for the purposes of pedestrian experience, convenience and place making. This would have significant public realm and townscape benefits for the local area. This would create opportunities to improve health and wellbeing and security, which could affect groups such as the homeless, women, older people and those with physical disabilities.</p> <p>The site seeks to encourage landscaping as part of the development and the provision of new trees which will help in softening the landscape.</p>
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓	<p>The site is within proximity of Bermondsey Street and Page's Walk Conservation Areas. The site should improve the settings of Paragon Gardens and Grade II listed Driscoll House. Part of the site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster. Part of the site lies within the Borough View of St Paul's Cathedral from One Tree Hill.</p> <p>Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads. A strategy for archaeological investigation and mitigation is required for this site.</p> <p>Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	<p>The allocation NSP53 and others seek to promote new cultural, leisure and sports facilities through required and suggested leisure, arts, culture or community uses.</p> <p>The site is in proximity to Paragon Gardens (Borough Open Land). All existing open space near the site area will be retained.</p>
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level II, Analysis 14) will have a "more vulnerable" use (mixed use including residential, town centre, employment and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The site will enable skills to be developed amongst workers employed do undertake the construction of new homes as well as skills developed in the town centre, employment and community establishments the development will provide.</li> <li>- The redevelopment will also bring forward positive impacts on walkability and connectivity with green pedestrian links, promoting active lifestyle and mental well-being.</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health</li> <li>- The proposal will provide new leisure, arts, culture or community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.</li> <li>- The improved connectivity and walkability within the site and with the wider area promotes active travel modes including walking and cycling, thus reducing the reliance on private vehicles and lowering the use of fossil fuels</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality.</li> <li>- The improved connectivity and walkability within the site and with the wider area will promote active travel modes including walking and cycling, which will help reduce the reliance on private vehicles.</li> <li>- The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support</li> </ul>

				<p>existing and future development</p> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.</p> <p>No basement dwellings should be permitted in this area. Non- domestic basement thresholds must be raised above the 2100 maximum water level, anticipated through breach of the River Thames defences. Internal access to upper floors must be provided and flood resilient design and construction techniques employed.</p> <p>SuDS selection and design should be in accordance with the sustainable drainage hierarchy and provide sufficient capacity to cater for all events up to the 1 in 100-year storm event, incorporating the latest allowances for climate change. Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home		✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The improved connectivity and walkability within the site and with the wider area will promote active travel modes including walking and cycling, which will help reduce the reliance on private vehicles.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP 54 Crimscott Street and Pages Walk**

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices and retail. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	A wider provision employment will help the population become more skilled, particularly in commercial uses.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities will be generated by the increase in employment space, which will help reduce poverty as residents will be more likely to be employed.
			✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is a key determinants of health
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Improved permeability across the site will combat severance between communities and encourage community interaction
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓	✓	NSP policies require non-residential buildings to achieve a BREEAM rating of 'excellent'. This ensures buildings are energy efficient and low carbon, which will help reduce the borough's carbon footprint and contribution to climate change.
IIAO 7	To improve the air quality	✓	✓	NSP policies require development to meet air quality neutral standards and to improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	All development will be required to be in keeping with the local townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is not within a conservation area but development should enhance the setting of the Pages Walk and Bermondsey Street conservation areas.

				<p>The site includes part of Grade II listed buildings 44 and 45 Grange Road.</p> <p>Part of the site lies within the Background Assessment Area of LVMF view 3A.1 from the Kenwood viewing gazebo to St Paul's Cathedral. Part of the site falls within the Borough View of St Paul's Cathedral from Nunhead Cemetery.</p> <p>Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.</p> <p>A strategy for archaeological investigation and mitigation is required for this site.</p> <p>Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	NSP policies encourage biodiversity measures to be incorporated into developments encourage natural habitat, examples these could include green or brown roofs.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 14) will have a "more vulnerable" use (mixed use including residential, employment, community and town centre uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will bring forward job opportunities with the retail and employment space reprovided at least the same amount currently on site, which will help tackle poverty</li> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Improved permeability across the site will combat severance between communities and encourage community interaction</li> <li>- Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety</li> <li>- NSP policies require non residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon will help reduce our carbon footprint and our contribution to manmade climate change</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space, the conservation area, heritage assets and the borough view, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS.</p>

				<p>No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Applications 15/AP/2474, 17/AP/3170 and 19/AP/1286 are relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with each application and has been considered in the decision making process. The site-specific FRAs demonstrate that the developments will be safe for their lifetimes, taking account of the vulnerability of its users, that the developments will not increase flood risk elsewhere, and that, where possible, flood risk will be reduced overall by the measures introduced by these schemes. The Environment Agency were consulted during the planning process for all applications and they have advised that they would have no objection to the proposals. A Basement Impact Assessment is required for any development proposals incorporating new or extended basement areas, and for the cases already granted on this site this assessment was submitted either at the point of application or has been secured by condition.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	The granted permissions within the site allocation will deliver public realm improvements this will help to create a more pleasant walking environment to encourage more sustainable modes of transport
			✓	The granted permissions within the site allocation will deliver cycle storage to support sustainable transport by providing the necessary facilities to support cycling as a mode of transport for users of the development
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The granted permissions within the site allocation will deliver a new gallery space or artist studios. This is an important part of infrastructure providing cultural uses within the borough.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP 55: Mandela Way**

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices and retail. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	A wider provision of employment will help the population become more skilled particularly in commercial uses.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space will help reduce poverty as an underlying determinant.
			✓✓	The provision of new public open space will provide opportunities for play and open-air sports facilities, enabling exercise which supports good physical health and mental health as well as facilitate relaxation and socialising is also beneficial for health and well being.
			✓✓	The provision of a new link from Hendre Way to Quietway 1 on Willow Walk will encourage more opportunities for walking and cycling contributing to good physical health and mobility through exercise.
			✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability and activation of frontages and new open spaces will promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.

IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Improved permeability across the site will help combat severance between communities and encourage community interaction.
			✓✓	A new public space for people to sit and gather will enable people from different cultures and backgrounds to interact in a shared space, encouraging community cohesion.
			✓✓	New entertainment and arts facilities will benefit the entire community, and may encourage more community interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	NSP policies require non residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon will help reduce our carbon footprint and our contribution to manmade climate change.
			✓✓	New public spaces will encourage urban greening to adapt to the effects of climate change, reduce the urban heat island effect and increase ecological resilience. Creating a new walkable public realm will reduce car use and therefore CO2 emissions and contributions to climate change. CO2 emissions may suffer as a result of accelerated levels of construction and demolition. NSP policies seek to minimise carbon dioxide emissions from development.
IIAO 7	To improve the air quality	✓✓	✓✓	NSP policies require development to meet air quality neutral standards and improve air quality.
			✓✓	A walkable public realm will reduce car use and therefore CO2 emissions will promote active and sustainable transport modes, improving air quality and mitigating greenhouse gas emissions.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	The site will provide and new public amenity space and landscaping including new public square. Enhanced high-quality public realm should also provide for a much improved engaging townscape which allows for freer movement and social interaction.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The site partially lies within the Page's Walk Conservation Area and should enhance its setting.</p> <p>The site should enhance the setting of Grade II listed building The White House.</p> <p>Much of the site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster. Much of the site falls within the Borough Views of St Paul's Cathedral from Nunhead Cemetery and One Tree Hill.</p> <p>Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads lies within the 'Bermondsey Lake' Archaeological Priority Area. A strategy for archaeological investigation and mitigation is required.</p> <p>The site is in proximity of the Bermondsey Abbey Buildings.</p> <p>Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	New green spaces, parks and green infrastructure provided are a major part of the vision, creating opportunities to improve biodiversity.

IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 14) will have a “more vulnerable’ use (mixed use including residential, employment, community and town centre uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will bring forward job opportunities with the retail and employment space reprovided at least the same amount currently on site, which will help tackle poverty</li> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Improved permeability across the site will combat severance between communities and encourage community interaction</li> <li>- Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety</li> <li>- NSP policies require non residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon will help reduce our carbon footprint and our contribution to manmade climate change</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space, the conservation area, heritage assets and the borough view, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.</p> <p>Basement dwellings should not be permitted within this area (Flood Zone 3). A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas for non-domestic use.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	<p>The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.</p> <p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.</p> <p>Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p> <p>By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.</p> <p>The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.</p>
IIAO 16	To promote sustainable transport and minimise the need	✓✓	✓✓	<p>The provision of a new link from Hendre Way to Quietway 1 on Willow Walk will encourage more opportunities for walking and cycling contributing to good physical health and mobility through exercise will further promote active transport modes.</p>

	to travel by car		✓✓	NSP policies require development to provide cycle storage to support development. This will ensure more active modes of transport in the area and reduce reliance on the car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP56: 107 Dunton Road (Tesco store and car park) and Southernwood Retail Park**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail, and leisure facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	A wider provision of employment will help the population become more skilled, particularly in commercial uses.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space will help reduce poverty as an underlying determinant.
			✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The provision of new public open space will provide opportunities for play and open-air sports facilities, enabling exercise which supports good physical health and mental health as well as facilitate relaxation and socialising is also beneficial for health and well being.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Improved permeability across the site will help combat severance between communities and encourage community interaction.
			✓✓	A new café will be provided where people can sit and gather which will enable people from different cultures and backgrounds to interact in a shared space, encouraging community cohesion.
			✓✓	The scheme will provide leisure, arts, culture or community uses (including a cinema) for the whole community to use which may help to encourage more community interaction and community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	NSP policies require non residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon will help reduce our carbon footprint and our contribution to manmade climate change.
			✓✓	Creating a new walkable and cyclable public realm will reduce car use and therefore CO2 emissions and contributions to climate change. The safeguarding of the site for the Bakerloo Line Extension will improve public transport links, thereby reducing the reliance on car use and reducing CO2 emissions and the reliance on fossil fuels. CO2 emissions may increase as a result of accelerated levels of construction and demolition. NSP

				policies seek to minimise carbon dioxide emissions from development.
IIAO 7	To improve the air quality	✓✓	✓✓	NSP policies require development to meet air quality neutral standards and improve air quality.
			✓✓	Creating a new walkable and cyclable public realm will promote active and sustainable transport modes, improving air quality and mitigating greenhouse gas emissions. The safeguarding of the site for the Bakerloo Line Extension will improve public transport links, thereby reducing the reliance on car use and improving air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	✓	✓	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, , but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	The site will provide and new landscaping and improved public realm. Enhanced high-quality public realm should also provide for a much improved engaging townscape which allows for freer movement and social interaction.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is in close proximity of the Coburg Road Conservation Area.
				The site is in close proximity of the Grade II listed Former Fire Station.
				Part of the site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster. Part of the site lies within the Borough View of St Paul's Cathedral from Nunhead Cemetery.
				Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.
				Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	New landscaping and green infrastructure provided are a major part of the site vision, creating opportunities to improve biodiversity.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level 2 - Analysis 14) will have a "more vulnerable" use (mixed use including residential, employment, community open space new visitor accommodation and town centre uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:
				<ul style="list-style-type: none"> <li>- The redevelopment will bring forward job opportunities with the retail and employment space reprovided at least the same amount currently on site, which will help tackle poverty</li> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The provision of new public open space will provide opportunities for play and open-air sports facilities, enabling exercise which supports good physical health and mental health as well as facilitate relaxation and socialising is also beneficial for health and well being</li> </ul>

				<ul style="list-style-type: none"> <li>- Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Improved permeability across the site will combat severance between communities and encourage community interaction</li> <li>- Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety</li> <li>- NSP policies require non residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon will help reduce our carbon footprint and our contribution to manmade climate change</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space, the conservation area, heritage assets and the borough view, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS.</p> <p>No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Application 18/AP/3551 is relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment and Drainage Strategy were submitted with this application and have been considered in the decision making process. The site-specific FRA and drainage strategy have been reviewed by the Environment Agency and the Drainage Team respectively. The drainage strategy has confirmed that:</p> <ul style="list-style-type: none"> <li>- All sleeping accommodation has been set above the flood protection level of 2.65mAOD; and</li> <li>- 30% of the ground floor of the site is permeable amenity space.</li> </ul> <p>The targeted discharge rates from the site, in line with greenfield rates for each duration are as follows:</p> <ul style="list-style-type: none"> <li>- 1 in 1 year storm - 3.60 l/s;</li> <li>- 1 in 30 year storm - 9.77 l/s; and</li> <li>- 1 in 100 year storm - 13.55 l/s.</li> </ul> <p>The site will also include blue and green roofs as well as permeable paving and underground storage tanks.</p> <p>The scheme includes provision for a large basement to be delivered across two phases. A basement impact assessment has been submitted and no concerns were raised from a flood risk perspective and would not have a detrimental impact on the environment. The assessment concluded that the proposed development can be constructed without adverse impacts to groundwater, surface water, and ground movements. As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The site has been safeguarded as an area of surface interest required for the Bakerloo Line Extension. A new station at this site would significantly reduce the need to travel by car by encouraging people to use public transport.
			✓✓	NSP policies require development to provide cycle storage to support development. This will ensure more active modes of transport in the area and reduce reliance on the car.

IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The delivery of a new Health Centre will ensure sufficient, accessible and higher quality primary and community health services for a growing population.
			✓✓	The scheme will provide leisure, arts, culture or community uses (including a cinema) which will act as important community facilities for cultural uses within the borough to support existing and future development.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP 57: Salisbury estate car park				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs during construction and in the new community facilities once they are completed. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Employees employed in the construction of the development will develop in skills, building and construction.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The site will improve the pedestrian link between Chatham Street and the open green space to the south of the site for public use this will improve walkability in the area encouraging more active modes of transport which is beneficial for health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	The prospective residents of this development (with the exception of wheelchair users) will be barred from obtaining car parking permits under the CPZ in this locality, reducing opportunities for car parking will encourage occupants of the development to use more sustainable modes of transport.
			✓	The cycle storage proposed for the development (46 cycle spaces) meets the requirements of the London Plan however falls significantly short of the emerging New Southwark Plan recommendation of 76 spaces, this will still however contribute to creating opportunities for more sustainable travel and reducing the carbon footprint.

			✓	The site will improve the pedestrian link between Chatham Street and the open green space to the south of the site for public use this will improve walkability in the area encouraging more active modes of transport which will contribute to creating opportunities for more sustainable travel and reducing the carbon footprint.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	The application site is located within an Air Quality Management Area. An Air Quality Assessment has identified that concentrations of all pollutants are below the air quality objectives, with the exception of NO2. Filters will be used to ensure compliance as a mitigation measure.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	The development on this site will provide improved landscaping and public realm improvements contributing to a welcoming pedestrian environment and townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster and LVMF view 1A.2 Alexandra Palace viewing terrace to St Paul's Cathedral.  The site is adjacent to Grade II listed Lady Margaret Church.  Development will be respectful to the designations of conservation areas and listed buildings and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	-	-	The proposed option/policy does not have any effect on the achievement of the objective.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level 2 - Analysis 14) will have a "more vulnerable" use residential use) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:  <ul style="list-style-type: none"> <li>- The redevelopment will bring forward job opportunities with the retail and employment space reprovided at least the same amount currently on site, which will help tackle poverty</li> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The site will improve the pedestrian link between Chatham Street and the open green space to the south of the site for public use this will improve walkability in the area encouraging more active modes of transport which is beneficial for health</li> <li>- Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space, the conservation area, heritage assets and the</li> </ul>

				<p>borough view, and reflect existing building heights, so as to respect the local character, heritage and townscape</p> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Application 19/AP/1506 is relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with this application and has been considered in the decision making process. The site-specific FRA demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. The Environment Agency were consulted during the planning process and they have advised that they would have no objection to the proposals.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>I1AO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
<b>I1AO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	NSP policies require development to provide cycle storage to support development. This will ensure more active modes of transport in the area and reduce reliance on the car.
<b>I1AO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	-	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP58: 96-120 Old Kent Road (Lidl store)

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new office and new town centre uses will allow staff to gain new skills whilst working in these establishments
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The site will provide new leisure, arts, culture or community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓	-	No specific measures have been identified to reduce climate change on this site.
			✓	P68 Sustainability standards require development to reduce the risk of overheating, taking into account climate change predictions over the lifetime of the building, in accordance with prioritised measures set out in the cooling hierarchy.
			✓	P68 Sustainability standards require development to achieve a BREEAM rating of 'Excellent' for major non-residential development and non self-contained residential development over 500sqm.
			✓	P68 Sustainability standards require development to achieve BREEAM rating of 'Excellent' in domestic refurbishment for conversion, extension and change of use of residential floorspace over 500sqm.
IIAO 7	To improve the air quality	✓	-	In addition, NSP policies require development to meet air quality neutral standards and improve air quality.
			✓	No specific measures have been identified to reduce climate change on this site.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.

<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	The site does not have a specific impact on this objective however all developments are required to be within the character of the townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster. The site falls within the Borough View of St Paul's Cathedral from One Tree Hill.  Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.  Development will be respectful to the designations of conservation areas and listed buildings and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	-	The site does not have a specific impact on this objective.
			✓	The NSP (P15 biodiversity) requires development to contribute to net gains in biodiversity.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 14) will have a "more vulnerable" use (mixed use including residential, town centre, employment and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality and contributing to reduction in greenhouse emissions</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.</p> <p>No basement dwellings should be permitted in this area (Flood Zone 3). Basement thresholds must be raised above the 2100 maximum water level, anticipated through breach of the River Thames defences. Internal access to upper floors must be provided and flood resilient design and construction techniques employed. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>SuDS selection and design should be in accordance with the sustainable drainage hierarchy and provide sufficient capacity to cater for all events up</p>

				<p>to the 1 in 100 year storm event, incorporating the latest allowances for climate change. Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	-	The site does not have a specific impact on this objective.
			✓	Developments on this site will require the provision of cycle storage and a car free development.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP59: Former petrol filling station, 233-247 Old Kent Road				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, retail and the community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new town centre uses will allow staff to gain new skills whilst working in these establishments.

IIO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health
IIO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Activation of frontages will open up spaces to promote overlooking of communal areas and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓	Communal amenity spaces will open up spaces to promote social interaction and the feeling of public safety.
IIO 6	To reduce contributions to climate change	✓	-	No specific measures have been identified to reduce climate change on this site.
			✓	P68 Sustainability standards require development to reduce the risk of overheating, taking into account climate change predictions over the lifetime of the building, in accordance with prioritised measures set out in the cooling hierarchy.
			✓	P68 Sustainability standards require development to achieve a BREEAM rating of 'Excellent' for major non-residential development and non self-contained residential development over 500sqm.
			✓	P68 Sustainability standards require development to achieve BREEAM rating of 'Excellent' in domestic refurbishment for conversion, extension and change of use of residential floorspace over 500sqm.
IIO 7	To improve the air quality	✓	-	In addition, NSP policies require development to meet air quality neutral standards and improve air quality.
			✓	No specific measures have been identified to reduce climate change on this site.
IIO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIO 9	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.

IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	The shared communal space on the ground floor will contribute to softening the landscape and townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster. The site falls within the Borough View of St Paul's Cathedral from One Tree Hill.</p> <p>Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.</p> <p>Development will be respectful to the designations of conservation areas and listed buildings and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	The site does not have a specific impact on this objective.
		✓	✓	The NSP (P15 biodiversity) requires development to contribute to net gains in biodiversity.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 14) will have a "more vulnerable" (residential and town centre uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will bring forward job opportunities with the retail and employment space reprovided at least the same amount currently on site, which will help tackle poverty</li> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction.</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The provision of new town centre uses allow staff to gain new skills whilst working in these establishments</li> <li>- Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space, the conservation area, heritage assets and the borough view, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>Application 18/AP/0928 is relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with this application and has been considered in the decision making process. The site-specific FRA and drainage strategy demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. Recommendations were set out in the case report to ensure this.</p> <p>No basements dwellings should be permitted in this area (Flood Zone 3).</p> <p>The Environment Agency were consulted during the planning process and they have advised that they would have no objection to the proposals.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
		✓✓	✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.

			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	-	The site does not have a specific impact on this objective.
			✓	Developments on this site will require the provision of cycle storage and a car free development.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓	-	The site does not have a specific impact on this objective.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

#### NSP 60: Kinglake Street Garages

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new town centre uses will allow staff to gain new skills whilst working in these establishments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The site will provide new leisure, arts, culture or community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.
IIAO 6	To reduce contributions to climate change	✓	-	No specific measures have been identified to reduce climate change on this site.

			✓	P68 Sustainability standards require development to reduce the risk of overheating, taking into account climate change predictions over the lifetime of the building, in accordance with prioritised measures set out in the cooling hierarchy.
			✓	P68 Sustainability standards require development to achieve a BREEAM rating of 'Excellent' for major non-residential development and non self-contained residential development over 500sqm.
			✓	P68 Sustainability standards require development to achieve BREEAM rating of 'Excellent' in domestic refurbishment for conversion, extension and change of use of residential floorspace over 500sqm.
IIAO 7	To improve the air quality	✓	✓	In addition, NSP policies require development to meet air quality neutral standards and improve air quality.
			-	No specific measures have been identified to improve air quality on this site.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	The site will provide and new landscaping and improved public realm. Enhanced high-quality public realm should also provide for a much improved engaging townscape which allows for freer movement and social interaction.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster. The site falls within the Borough View of St Paul's Cathedral from One Tree Hill.
				Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads. Development will be respectful to the designations of conservation areas and listed buildings and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The proposal would include shrub planting in front of the new houses and 4 new trees on the parking/access strip on Ivy Church Lane A biodiverse roof is also proposed to development granted which will encourage biodiversity.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level 2 - Analysis 15) will have a "more vulnerable" use (mixed use including town centre, residential and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:  <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants</li> </ul>

				<p>of public health</p> <ul style="list-style-type: none"> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The creation of new green links will combat severance between communities and encourage community interaction</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality and contributing to reduction in greenhouse emissions</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The accessibility to Brockwell Park will be enhanced by the new pedestrian link of Half Moon Line, which will promote the public appreciation of the significant green space and improve the green linkages. As such it will promote the green corridors and biodiversity</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Application 16/AP/4589 is relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with this application and has been considered in the decision making process. The site-specific FRA proposes flood resilience measures, emergency evacuation procedures and construction techniques such as water tight doors, water proof construction techniques and usage of sensitive materials above ground.</p> <p>The Environment Agency were consulted during the planning process for all applications and they have advised that they would have no objection to the proposals.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓	The development proposals include a total of 36 cycle spaces for the residential scheme. The terrace of houses will have private cycle stores, (2 per dwelling) within the gardens. Storage for 28 bicycles would be provided within the ground floor of the flatted block. Two spaces would also be provided for the commercial unit. Ensuring provision for cycle storage will help to encourage residents to use more active modes of transport and minimise the need to travel by car.
			✓✓	The proposal would result in the loss of 48 garages and 4 external parking spaces.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres which are all important facilities for community and cultural uses within the borough to support existing and future development.

			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.
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NSP 61: 4/12 Albany Road				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new town centre uses will allow staff to gain new skills whilst working in these establishments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The site should provide new leisure, arts, culture or community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.
IIAO 6	To reduce contributions to climate change	✓	-	No specific measures have been identified to reduce climate change on this site.
			✓	P68 Sustainability standards require development to reduce the risk of overheating, taking into account climate change predictions over the lifetime of the building, in accordance with prioritised measures set out in the cooling hierarchy.
			✓	P68 Sustainability standards require development to achieve a BREEAM rating of 'Excellent' for major non-residential development and non self-contained residential development over 500sqm.
			✓	P68 Sustainability standards require development to achieve BREEAM rating of 'Excellent' in domestic refurbishment for conversion, extension and change of use of residential floorspace over 500sqm.
IIAO 7	To improve the air quality	✓	-	In addition, NSP policies require development to meet air quality neutral standards and improve air quality.
			✓	No specific measures have been identified to improve air quality on this site.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and

	of water resources			sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, , but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	-	No specific measures have been identified to improve air quality on this site.
			✓	All development will be required to be in keeping with the local townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The site is in close proximity of the Grade II listed former Fire Station on Shorncliffe Road. The unlisted Thomas A. Beckett Pub adjacent to the site is of architectural and historic interest.</p> <p>The site lies within the Borough View of St Paul's Cathedral from Nunhead Cemetery.</p> <p>1 APA designation. The site is located in APA1- North Southwark and Roman Roads.</p> <p>Development will be respectful to the designations of conservation areas and listed buildings and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	<p>The site is in proximity of the entrance to Burgess Park (Metropolitan Open Land).</p> <p>Development should seek to enhance open spaces near the site.</p>
			✓	NSP policies encourage biodiversity measures to be incorporated into developments encourage natural habitat. These could include green or brown roofs.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 15) will have a "more vulnerable" use (mixed use including residential, employment, town centre and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The proposal will provide new leisure, arts, culture or community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.</li> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active</li> </ul>

				<p>travel modes</p> <ul style="list-style-type: none"> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. .
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	-	No specific measures have been identified to support this objective within the site allocation
			✓	Development will need to provide the cycle storage to support the development and encourage sustainable modes of transport.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.

**NSP 62: Former Southern Railway Stables**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	The provision of new office uses will allow staff to gain new skills whilst working in these establishments.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health. Provision of new publicly accessible open space will have positive impacts on people's mental and physical health.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Provision of a new open space for people to sit and gather will also provide natural surveillance within the area.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
			✓✓	Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The proposal will provide new leisure, arts, culture or community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
<b>IIAO 6</b>	To reduce contributions to climate change	✓	-	No specific measures have been identified to reduce climate change on this site.
			✓	P68 Sustainability standards require development to reduce the risk of overheating, taking into account climate change predictions over the lifetime of the building, in accordance with prioritised measures set out in the cooling hierarchy.
			✓	P68 Sustainability standards require development to achieve a BREEAM rating of 'Excellent' for major non-residential development and non self-contained residential development over 500sqm.
			✓	P68 Sustainability standards require development to achieve BREEAM rating of 'Excellent' in domestic refurbishment for conversion, extension and change of use of residential floorspace over 500sqm.
<b>IIAO 7</b>	To improve the air quality	✓	-	In addition, NSP policies require development to meet air quality neutral standards and improve air quality.
			✓	No specific measures have been identified to improve air quality on this site.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate

	as a resource			management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land but soil quality is unlikely to significantly improve due to few large scale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓✓	A new public space will form part of this site allocation and will help soften and enhance the landscape.
			✓	All development will be required to be in keeping with the local townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The unlisted former Southern Railway Stables, horse hospital and the forge are identified as buildings of architectural and historic interest and are subject to an Article 4 Direction. The stables, the horse hospital and the forge should be retained or repurposed for employment uses. The site is in proximity to the Grade II listed Eveline Lowe School.</p> <p>Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.</p> <p>Development will be respectful to the designations of listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The site allocation must provide new public open space.
			✓	NSP policies encourage biodiversity measures to be incorporated into developments encourage natural habitat, examples these could include green or brown roofs.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 15) will have a “more vulnerable” use (mixed use including residential, employment, and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The proposal will provide new leisure, arts, culture or community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.</li> </ul>

				<ul style="list-style-type: none"> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. No basement dwellings should be permitted in this area (Flood Zone 3). A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	The site will result in the loss of carpark which will reduce opportunities for car parking.
			✓	Development will need to provide the cycle storage to support the development and encourage sustainable modes of transport.
IIAO 17	To provide the necessary infrastructure to support existing and future development	ü✓	✓✓	The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, are galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP 63: Land bounded by Glengall Road, Latona Road and Old Kent Road**

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail and community and leisure facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment and retail uses will allow staff to gain new skills whilst working in these establishments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The provision of new open space will enable opportunities for play and open-air sports facilities, enabling exercise which supports good physical and mental health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Provision of a new open space for people to sit and gather will also provide natural surveillance within the area.
			✓✓	Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The site will provide new leisure, arts, culture or community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.
IIAO 6	To reduce contributions to climate change	✓	✓	P68 Sustainability standards require development to reduce the risk of overheating, taking into account climate change predictions over the lifetime of the building, in accordance with prioritised measures set out in the cooling hierarchy.
			✓	P68 Sustainability standards require development to achieve a BREEAM rating of 'Excellent' for major non-residential development and non self-contained residential development over 500sqm.
			✓	P68 Sustainability standards require development to achieve BREEAM rating of 'Excellent' in domestic refurbishment for conversion, extension and change of use of residential floorspace over 500sqm.
IIAO 7	To improve the air quality	✓	✓	NSP policies require development to meet air quality neutral standards and improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate

	as a resource			management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓✓	A new public space will form part of this site allocation and will help soften and enhance the landscape.
			✓	All development will be required to be in keeping with the local townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The site includes the Grade II listed mural depicting the history of Old Kent Road and is in proximity of Grade II listed buildings on Glengall Road. The site contains buildings and features of townscape merit and two chimneys of historic interest.</p> <p>The western part of the site lies within the Borough View of St Paul's Cathedral from One Tree Hill.</p> <p>Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.</p> <p>Development should enhance the setting of the adjacent Glengall Road Conservation Area.</p>
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The site allocation must provide new public open space. The provision of green spaces would improve the long term health and wellbeing of the population. This will help to enhance biodiversity and ecological resilience.
			✓	NSP policies encourage biodiversity measures to be incorporated into developments encourage natural habitat, examples these could include green or brown roofs.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 15) will have a "more vulnerable" use (mixed use including residential, employment, town centre, open space and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment and retail uses will allow staff to gain new skills whilst working in these establishments</li> <li>- . The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The provision of new open space will enable opportunities for play and open-air sports facilities, enabling exercise which supports good physical and mental health</li> </ul>

				<ul style="list-style-type: none"> <li>- The proposal will provide new D leisure, arts, culture or community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.</li> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Applications 17/AP/2773, 17/AP/2952, 17/AP/4612, 17/AP/4596, 18/AP/3246, 18/AP/4003, 18/AP/3284 and 20/AP/0039 are relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with each application where relevant and has been considered in the decision making process. The site-specific FRAs demonstrate that the developments will be safe for their lifetime taking account of the vulnerability of users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.</p> <p>The Environment Agency was consulted during the planning process for all applications which were within their remit and they have advised that they would have no objection to the proposals. Planning conditions in relation to flood risk management, including meeting greenfield runoff rates and paying financial contributions where there is a shortfall, have formed part of the permission.</p> <p>Where necessary, a Basement Impact Assessment has been submitted or secured by condition for proposals incorporating new or extended basement areas.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	Development will need to provide the cycle storage to support the development and encourage sustainable modes of transport.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate leisure, arts, culture or community uses uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.

			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.
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NSP 64: Marlborough Grove and St James's Road				
I/A Objective	Description	Averaged Grading	Sub grading	Commentary
I/AO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
I/AO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these establishments.
I/AO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The provision of new open space will enable opportunities for play and open-air sports facilities, enabling exercise which supports good physical and mental health. The provision of green spaces would improve the long term health and wellbeing of the population.

IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓	Provision of a new open space for people to sit and gather will also provide natural surveillance within the area.
			✓✓	Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The proposal will provide new leisure, arts, culture or community uses which should help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓	✓	P68 Sustainability standards require development to reduce the risk of overheating, taking into account climate change predictions over the lifetime of the building, in accordance with prioritised measures set out in the cooling hierarchy.
			✓	P68 Sustainability standards require development to achieve a BREEAM rating of 'Excellent' for major non-residential development and non self-contained residential development over 500sqm.
			✓	P68 Sustainability standards require development to achieve BREEAM rating of 'Excellent' in domestic refurbishment for conversion, extension and change of use of residential floorspace over 500sqm.
IIAO 7	To improve the air quality	✓	✓	NSP policies require development to meet air quality neutral standards and improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	A new public space will form part of this site allocation and will help soften and enhance the landscape.
			✓	All development will be required to be in keeping with the local townscape.

IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The site is in close proximity to the Grade II listed Evelina Lowe School. The site contains buildings of townscape merit (the old varnish and “Japan” factory at 328-324 St James’s Road and the 1930s Chevron office buildings (now in residential use) at 294-304 St James’s Road) and buildings of architectural and historic interest (the Georgian terrace adjacent to the new “Bath House” at 541-553 Old Kent Road).</p> <p>Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.</p> <p>The site is in close proximity of Evelina Lowe Nature Garden (Other Open Space).</p> <p>Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	<p>The site allocation must provide new public open space. This will help to enhance biodiversity and ecological resilience.</p> <p>NSP policies encourage biodiversity measures to be incorporated into developments encourage natural habitat, examples these could include green or brown roofs.</p>
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 15) will have a “more vulnerable’ use (mixed use including residential, town centre, employment, open space and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The creation of new green links will combat severance between communities and encourage community interaction</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality and contributing to reduction in greenhouse emissions</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Applications 18/AP/0156 is relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with the application and has been considered in the decision making process. The site-specific FRA proposes measures such as ensuring finished floor levels are at least 300mm above the maximum breach flood level on site, ensuring residential accommodation is above basement and lower ground</p>

				<p>floor as well as adopting flood resilient construction techniques such as the use of plasterboards and air bricks.</p> <p>The Environment Agency were consulted during the planning process for all applications and they have advised that they would have no objection to the proposals.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	Development will need to provide the cycle storage to support the development and encourage sustainable modes of transport.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
			✓✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP 65: Sandgate Street and Verney Road**

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail, community facilities and the newly provided educational facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these establishments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The provision of new open space will enable opportunities for play and open-air sports facilities, enabling exercise which supports good physical and mental health. The provision of green spaces would improve the long term health and wellbeing of the population.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Provision of a new open space for people to sit and gather will also provide natural surveillance within the area.
			✓✓	Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The application at the Ruby Triangle (18/AP/0892) will provide a gym and new public hall, and the application at the site (Land Bounded By Ruby Street Murdock Street) will provide floor space for a church. These community uses will help encourage more community interaction with different groups within the local area providing more awareness of the diverse groups living within the area and encouraging community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	The site should accommodate D uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
IIAO 6	To reduce contributions to climate change	✓	✓	P68 Sustainability standards require development to reduce the risk of overheating, taking into account climate change predictions over the lifetime of the building, in accordance with prioritised measures set out in the cooling hierarchy.
			✓	P68 Sustainability standards require development to achieve a BREEAM rating of 'Excellent' for major non-residential development and non self-contained residential development over 500sqm.
			✓	P68 Sustainability standards require development to achieve BREEAM rating of 'Excellent' in domestic refurbishment for conversion, extension and change of use of residential floorspace over 500sqm.

IIAO 7	To improve the air quality	✓	✓	NSP policies require development to meet air quality neutral standards and improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	A new public space will form part of this site allocation and will help soften and enhance the landscape.
			✓	All development will be required to be in keeping with the local townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	The site includes Grade II listed buildings Canal Grove Cottages and the Grade II listed Gasholder no.13 from the former gasworks. The site contains buildings and features of townscape merit.
				Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.  Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The site allocation must provide new public open space. This will help to enhance biodiversity and ecological resilience.
			✓	NSP policies encourage biodiversity measures to be incorporated into developments encourage natural habitat, examples these could include green or brown roofs.
IIAO 14	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 17) will have a “more vulnerable’ use (mixed use including residential, town centre, employment, open space and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these</li> <li>- A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough. By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing. It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> </ul>

				<ul style="list-style-type: none"> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The creation of new green links will combat severance between communities and encourage community interaction</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality and contributing to reduction in greenhouse emissions</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Applications 16/AP/5235, 18/AP/0897, 17/AP/4508 and 18/AP/0196, 18/AP/2895 and 19/AP/1710 are relevant to this site allocation, as planning permission has been granted. All approved applications on site have provided a site specific flood risk assessment and drainage strategy which demonstrates that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. The recommendations proposed by the FRA and drainage strategy have been accepted by the Environment Agency and Flood and Drainage Team.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	Development will need to provide the cycle storage to support the development and encourage sustainable modes of transport.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site will provide a new gym, church and community hall. These are all important facilities for community uses within the borough to support existing and future development.

NSP 66: Devon Street and Sylvan Grove

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail, and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these establishments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The provision of new open space will enable opportunities for play and open-air sports facilities, enabling exercise which supports good physical and mental health. The provision of green spaces would improve the long term health and wellbeing of the population.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Provision of a new open space for people to sit and gather will also provide natural surveillance within the area.
			✓✓	Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	New leisure, arts, culture or community uses on site will provide entertainment and arts facilities to the community at large which can help to encourage more community interaction.
			✓✓	The site will seek to improve areas in which people can meet, in formal and informal settings, such as outdoor public spaces, restaurants, cafes, and community halls.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community interaction.
IIAO 6	To reduce contributions to climate change	✓	✓	P68 Sustainability standards require development to reduce the risk of overheating, taking into account climate change predictions over the lifetime of the building, in accordance with prioritised measures set out in the cooling hierarchy.
			✓	P68 Sustainability standards require development to achieve a BREEAM rating of 'Excellent' for major non-residential development and non self-contained residential development over 500sqm.

			✓	P68 Sustainability standards require development to achieve BREEAM rating of 'Excellent' in domestic refurbishment for conversion, extension and change of use of residential floorspace over 500sqm.
<b>IIAO 7</b>	To improve the air quality	✓	✓	NSP policies require development to meet air quality neutral standards and improve air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	A new public space will form part of this site allocation and will help soften and enhance the landscape.
			✓	All development will be required to be in keeping with the local townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is in proximity to the Caroline Gardens Conservation Area. The site contains buildings of townscape merit. Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads. Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The site allocation must provide new public open space. This will help to enhance biodiversity and ecological resilience.
			✓	NSP policies encourage biodiversity measures to be incorporated into developments encourage natural habitat, examples these could include green or brown roofs.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level 2 - Analysis 17) will have a "more vulnerable" use (mixed use including residential, town centre, employment, open space and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:  <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these</li> </ul>

				<ul style="list-style-type: none"> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The creation of new green links will combat severance between communities and encourage community interaction</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality and contributing to reduction in greenhouse emissions</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>Applications 15/AP/1330 and 19/AP/1239 are relevant to this site allocation, as planning permission has been granted. Site-specific flood Risk Assessments were submitted with the applications and have been considered in the decision making process, demonstrating that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. The recommendations proposed by the FRA and drainage strategy have been accepted by the Environment Agency and Flood and Drainage Team. Conditions in relation of flood risk management as recommended by the Environmental Agency have formed part of the planning permission.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	<p>The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.</p> <p>The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.</p> <p>Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p> <p>By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.</p> <p>The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.</p>

IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	Development will need to provide the cycle storage to support the development and encourage sustainable modes of transport.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
			✓✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP 67: Hatcham Road, Penarth Street and Ilderton Road				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, office, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these establishments. The site may provide education uses and the Penarth Centre could provide arts and cultural uses which would in turn have educational benefits to the population. Residents could learn new skills through engagement with creative industries.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
			✓✓	The provision of new open space will enable opportunities for play and open-air sports facilities, enabling exercise which supports good physical and mental health. The provision of green spaces would improve the long term health and wellbeing of the population.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Provision of a new open space for people to sit and gather will also provide natural surveillance within the area.
			✓✓	Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	New leisure, arts, culture and community uses on site will provide entertainment and arts facilities to the community at large which can help to encourage more community interaction.
			✓✓	The site will seek to improve areas in which people can meet, in formal and informal settings, such as outdoor public spaces, restaurants, cafes, and community halls.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓	✓	P68 Sustainability standards require development to reduce the risk of overheating, taking into account climate change predictions over the lifetime of the building, in accordance with prioritised measures set out in the cooling hierarchy.
			✓	P68 Sustainability standards require development to achieve a BREEAM rating of 'Excellent' for major non-residential development and non self-contained residential development over 500sqm.

			✓	P68 Sustainability standards require development to achieve BREEAM rating of 'Excellent' in domestic refurbishment for conversion, extension and change of use of residential floorspace over 500sqm.
<b>IIAO 7</b>	To improve the air quality	✓	✓	NSP policies require development to meet air quality neutral standards and improve air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	A new public space will form part of this site allocation and will help soften and enhance the landscape.
			✓	All development will be required to be in keeping with the local townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site contains some buildings of townscape merit and buildings of architectural and historic interest.  Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.  Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The site allocation must provide new public open space. This will help to enhance biodiversity and ecological resilience.
			✓	NSP policies encourage biodiversity measures to be incorporated into developments encourage natural habitat, examples these could include green or brown roofs.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level 2 -Analysis 16) will have a "more vulnerable' use (mixed use including residential, town centre, employment, open space and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:  <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across</li> </ul>

				<p>London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</p> <ul style="list-style-type: none"> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The creation of new green links will combat severance between communities and encourage community interaction</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality and contributing to reduction in greenhouse emissions</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. Applications 16/AP/2436, 18/AP/2497, 16/AP/1092, 17/AP/3757, 17/AP/4546, 18/AP/1049, 17/AP/4819, 17/AP/4649, 18/AP/2761 and 19/AP/1773 are relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with each application where relevant and has been considered in the decision making process, demonstrating that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas, although no basement dwellings are permitted. All of the granted schemes in this area have submitted the required basement assessment at the point of application or will provide an assessment as secured by condition.</p> <p>The recommendations proposed by the FRA and drainage strategy have been accepted by the Environment Agency and Flood and Drainage Team.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	Development will need to provide the cycle storage to support the development and encourage sustainable modes of transport.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.

			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.
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NSP 68: 760 and 812 Old Kent Road (Toyru store) and 840 Old Kent Road (Aldi store)

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these establishments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Activation of frontages will open up spaces to promote social interaction and the feeling of public safety. The site allocation does not have a specific impact on this objective but development is required to ensure that it is safe and designs out opportunities for crime
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	New leisure, arts, culture and community uses on site will provide entertainment and arts facilities to the community at large which can help to encourage more community interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	The site will seek to improve areas in which people can meet, in formal and informal settings, such as outdoor public spaces, restaurants, cafes, and community halls.
IIAO 6	To reduce contributions to climate change	✓	✓	P68 Sustainability standards require development to reduce the risk of overheating, taking into account climate change predictions over the lifetime of the building, in accordance with prioritised measures set out in the cooling hierarchy.
			✓	P68 Sustainability standards require development to achieve a BREEAM rating of 'Excellent' for major non-residential development and non self-contained residential development over 500sqm.
			✓	P68 Sustainability standards require development to achieve BREEAM rating of 'Excellent' in domestic refurbishment for conversion, extension and change of use of residential floorspace over 500sqm.
			✓	The safeguarding of the site for the Bakerloo Line Extension will improve public transport links, thereby reducing the reliance on car use and reducing CO2 emissions and the reliance on fossil fuels.
IIAO 7	To improve the air quality	✓	✓	NSP policies require development to meet air quality neutral standards and improve air quality. The safeguarding of the site for the Bakerloo Line Extension will improve public transport links, thereby reducing the reliance on car use and improving air quality.

<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	All development will be required to be in keeping with the local townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The site is in close proximity of the Caroline Gardens Conservation Area.</p> <p>The site is within proximity of the Grade II listed Licensed Victuallers Benevolent Institution (Caroline Gardens).</p> <p>Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.</p> <p>Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	-	The site allocation does not have any effect on the achievement of the objective.
			✓	NSP policies encourage biodiversity measures to be incorporated into developments encourage natural habitat, examples these could include green or brown roofs.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 17) will have a “more vulnerable” use (mixed use including residential, town centre, employment and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety. The site allocation does not have a specific impact on this objective but development is required to ensure that it is safe and designs out opportunities for crime</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul>

				<p>- The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.</p> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Application 19/AP/1322 is relevant to this site allocation, as planning permission has been granted. A Flood Risk Assessment was submitted with this application and has been considered in the decision-making process. A site-specific FRA is required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. The FRA proposes the use of SUDS namely an attenuation tank, flow control chamber and green roof with the surface water destination being to a combined sewer. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>The recommendations proposed by the FRA and drainage strategy have been accepted by the Environment Agency and Flood and Drainage Team.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	Development will need to provide the cycle storage to support the development and encourage sustainable modes of transport.
			✓✓	The site has the potential to host a new underground station as part of the Bakerloo Line extension. The site has been safeguarded as an area of surface interest required for the Bakerloo Line Extension. A new station at this site would significantly reduce the need to travel by car by encouraging people to use public transport.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP69: 684-698 Old Kent Road (Kwikfit garage)

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, offices, retail and community facilities. The increase in the number of local jobs will tackle poverty by decreasing the employment rate and providing a stable income to a greater number of people, and will subsequently encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these establishments.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The retention or provision of active frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	New D uses on site could provide entertainment and arts facilities to the community at large which can help to encourage more community interaction.
			✓✓	The site could seek to improve areas in which people can meet, in formal and informal settings, such as outdoor public spaces, restaurants, cafes, and community halls.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓	ü	P68 Sustainability standards require development to reduce the risk of overheating, taking into account climate change predictions over the lifetime of the building, in accordance with prioritised measures set out in the cooling hierarchy.
			✓	P68 Sustainability standards require development to achieve a BREEAM rating of 'Excellent' for major non-residential development and non self-contained residential development over 500sqm.
			✓	P68 Sustainability standards require development to achieve BREEAM rating of 'Excellent' in domestic refurbishment for conversion, extension and change of use of residential floorspace over 500sqm.
IIAO 7	To improve the air quality	✓	✓	NSP policies require development to meet air quality neutral standards and improve air quality.
IIAO 8	To avoid waste and maximise,	-	-	

	reuse or recycle waste arising as a resource			Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	All development will be required to be in keeping with the local townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is adjacent to the Grade II listed Camberwell Public Library and Livesey Museum.  1 APA designation. The site is located in APA1- North Southwark and Roman Roads.  Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	-	The site allocation does not have any specific effect on the achievement of the objective.
			✓	NSP policies encourage biodiversity measures to be incorporated into developments encourage natural habitat, examples these could include green or brown roofs.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level 2 - Analysis 17) will have a "more vulnerable" use (mixed use including residential, town centre, employment and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:  <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment , retail and community uses will allow staff to gain new skills whilst working in these</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- New D uses on site which will provide entertainment and arts facilities to the community at large which can help to encourage more community interaction.</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support</li> </ul>

				<p>existing and future development.</p> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	Development will need to provide the cycle storage to support the development and encourage sustainable modes of transport.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site should accommodate leisure, arts, culture or community uses. These could include nurseries, day centres, schools, art galleries, gymnasiums, cinemas and training centres. These are all important facilities for community and cultural uses within the borough to support existing and future development.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development. i

NSP70: 636 Old Kent Road

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within construction, retail and community facilities. The increase in the number of local jobs will tackle poverty and encourage wealth creation within the local community.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new employment and retail use will allow staff to gain new skills whilst working in these establishments.
			✓✓	Staff will gain new skills in the construction of the development.
IIAO 3	To improve the health of the population	✓✓	✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The retention or provision of active frontages will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The site will provide opportunities for the local community to sit and gather through A3 uses such as restaurants, which will increase opportunities for the community interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓	✓	P68 Sustainability standards require development to reduce the risk of overheating, taking into account climate change predictions over the lifetime of the building, in accordance with prioritised measures set out in the cooling hierarchy.
			✓	P68 Sustainability standards require development to achieve a BREEAM rating of 'Excellent' for major non-residential development and non-self-contained residential development over 500sqm.
			✓	P68 Sustainability standards require development to achieve BREEAM rating of 'Excellent' in domestic refurbishment for conversion, extension and change of use of residential floorspace over 500sqm.

IIAO 7	To improve the air quality	✓	✓	NSP policies require development to meet air quality neutral standards and improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	Uplift in employment could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	All development will be required to be in keeping with the local townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.  Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	The site allocation does not have any specific effect on the achievement of the objective.
			✓	NSP policies encourage biodiversity measures to be incorporated into developments encourage natural habitat, examples these could include green or brown roofs.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level 2 - Analysis 15) will have a "more vulnerable" use (mixed use including residential, town centre, employment and community uses) in Flood Zone 3 and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows: <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The provision of new employment, retail and community uses will allow staff to gain new skills whilst working in these</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Activation of frontages will open up spaces to promote social interaction and the feeling of public safety.</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building</li> </ul>

				<p>heights, so as to respect the local character, heritage and townscape</p> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted in this area (Flood Zone 3).</p> <p>Application 17/AP/1646 is relevant to this site allocation, as planning permission has been granted subject to S106 legal agreement. A Flood Risk Assessment was submitted with the application and considered in the decision-making process.</p> <p>The FRA noted that the ground floor has a number of more vulnerable uses including sleeping accommodation, kitchen, living-dining, stores and bathrooms. There is also a water tank room, communal area and wheelchair parking, post and meter room at ground level. The FRA states that the proposed ground floor FFL for the proposed development will be +3.43mAOD which is the highest level achievable on site whilst maintaining safe access to the site from the adjacent public Highway. This FFL is circa 0.23m above the 2065 modelled flood for an extreme inundation event. It is 0.3m below the 2100 modelled level. To compensate for these considerations for flood resistant construction and safe access and egress are mentioned.</p> <p>The FRA makes consideration for the following mitigation measures that should be adhered to:</p> <ul style="list-style-type: none"> <li>- Flood resilience: the proposed development provides the opportunity to protect inhabitants by adopting flood resilience measures that take into account predicted effects of climate change</li> <li>- Flood warning: there is a recommendation to notify residents and encourage them to sign up to the EA flood warning systems to provide them with advanced notice in the unlikely case of a flood event.</li> </ul> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The policy will help to increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people and to ensure that everyone has access to high quality housing, regardless of income.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	Many economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development, housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements, housing growth should be sustained including affordable housing.
			✓✓	The increased delivery of housing and affordable housing should enable people in the borough who may have previously not have had a permanent home to be able to afford a home, and will enable families to remain residing in the same household or area if they choose to do so, which will have positive impacts for health and social cohesion.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	Development will need to provide the cycle storage to support the development and encourage sustainable modes of transport.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

AV.14 Peckham Area Vision

Peckham Area Vision and site allocations NSP71 – NSP74 as follows:

- NSP71: Aylesham Centre and Peckham Bus Station
- NSP72: Blackpool Road Business Park
- NSP73: Land between the railway arches (East of Rye Lane including railway arches)
- NSP74: Copeland Industrial Park and 1-27 Bournemouth Road

	AV.14				NSP71:	NSP72:	NSP73:	NSP74
	Area wide	S	M	L				
I1AO 1	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
I1AO 2	✓✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓
I1AO 3	✓✓	✓	✓	✓✓	✓✓	✓✓	✓	✓
I1AO 4	-	-	-	-	✓✓	✓✓	-	✓✓
I1AO 5	✓✓	x	✓	✓✓	✓✓	✓✓	✓✓	✓✓
I1AO 6	✓	-	-	✓	✓	✓✓	✓✓	✓✓
I1AO 7	✓	-	-	✓	✓✓	✓✓	✓	✓
I1AO 8	-	-	-	-	-	-	-	-
I1AO 9	-	-	-	-	-	-	-	-
I1AO 10	-	-	-	-	-	-	-	-
I1AO 11	✓✓	-	✓	✓✓	✓✓	✓✓	✓	✓✓
I1AO 12	✓	-	✓	✓	✓	✓	✓	✓
I1AO 13	✓	-	✓	✓	✓	✓	✓	✓
I1AO 14	✓	✓	✓	✓	✓	✓	✓	✓
I1AO 15	✓✓	✓	✓✓	✓✓	✓✓	✓✓	-	✓✓
I1AO 16	✓	-	✓	✓	✓✓	✓✓	✓	✓
I1AO 17	✓✓	✓	✓✓	✓✓	✓✓	✓	✓	✓✓
Avg.	59%	15%	41%	59%	71%	71%	47%	71%

## Integrated Impact Assessment for:

Peckham Area Vision and site allocations NSP71 – NSP74 as follows:

- NSP71: Aylesham Centre and Peckham Bus Station
- NSP72: Blackpool Road Business Park
- NSP73: Land between the railway arches (East of Rye Lane including railway arches)
- NSP74: Copeland Industrial Park and 1-27 Bournemouth Road

Peckham Area Vision and site allocations NSP71 – NSP74						
IIA Objective	Description	Area wide	Timescale			Commentary
			Small term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	On employment sites the re-provision of employment floorspace is required. On retail sites the re-provision of retail floorspace is required. This will ensure no employment or retail floorspace is lost and in many cases will provide uplift in employment and retail space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses and promotion of small business space will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty. The potential transition away from light industrial uses in some cases, for example NSP74 (Copeland Road Industrial Park), could result in the loss of this type of job opportunity, although the anticipated uplift of employment space let as smaller units will attract a variety of different employers and opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓	✓	✓✓	Under NSP policies significant levels of construction and uplift in employment and retail space will provide training and jobs in construction and in the final development.
IIAO 3	To improve the health of the population	✓✓	✓	✓	✓✓	Enhancement of green linkages and planned cycle networks will promote active lifestyles and help reduce the causes and exposure to poor air quality. Higher density development envisaged will free up space and routes between building plots to improve legibility and promote social interaction. Parts of Peckham fall within the most deprived areas within Southwark however increased job opportunities generated by employment space uplift and town centre uses which will help reduce unemployment and in turn poverty as an underlying determinant. Improvement of transport links and connectivity enhancements will improve access to employment opportunities and other facilities for all existing and future residents. Potential for extra care homes provision at NSP74 recognises the importance of addressing borough-wide needs in a suitable location.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	✓	✓	Improved permeability and activation of frontages through provision of town centre uses will open up spaces to promote social interaction and the feeling of public safety. High quality and inclusive public realm enhancement accessible to all groups will promote an enhanced sense of community, particularly through the required improvements to current-industrial sites identified in site allocations NSP72, NSP73 and NSP74.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	x	✓	✓✓	High quality and inclusive public realm enhancements will be accessible to all groups. Green linkages and planned cycle ways will create a more legible urban environment to avoid physical barriers and issues of severance. Parts of Peckham fall within the most deprived areas within Southwark however increased job opportunities generated by employment space uplift and town centre uses which will help reduce unemployment and in turn poverty as an underlying determinant. There may be disruptions to local communities from the concentration of largescale redevelopment in a localised area. Peckham may be particularly susceptible to the impacts of this type of disruption given the demographic profile of some of its hard-to-reach communities, however the long term benefits of redevelopment should be far reaching and significantly narrow the inequality gap. Potential for extra care homes provision at NSP74 would help ensure development serves all groups.
IIAO 6	To reduce contributions to climate change	✓	-	-	✓	Ensuring the growth and vitality of the town centre will promote walkable neighbourhoods which reduces contributions to climate change through a reduction on car-dependency. Green linkages and planned cycle ways will promote active transport and sustainable modes, improving air quality and reducing greenhouse gas emissions. This measure will encourage urban greening to adapt to the effects of

						climate change, reduce the urban heat island effect and increase ecological resilience of the Ecology Restoration Area (LRA02: Peckham Town Centre, Camberwell Grove Street trees and Denmark Hill Station). NSP policies seek to minimise carbon dioxide emissions from development.
IIAO 7	To improve the air quality	✓	-	-	✓	Green linkages and planned cycle ways will promote active transport modes, helping to address the causes of poor air quality. Air quality could suffer from the effects of accelerated levels of construction and demolition. However, potential transition away from industrial uses proposed at some of the site allocations (NSP74) may improve air quality as well limiting the number of HGV's within the sub-area which should have a positive effect on congestion and emissions. NSP policies requires development to meet air quality neutral standards and improve air quality
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	-	✓	✓✓	Development will be respectful to the designations of conservation areas and strategic viewing corridors where they apply. All existing open space is to be retained whilst new open space proposed will encourage urban greening and landscape enhancements. Enhanced high-quality public realm should provide for a much improved townscape. The increased densities proposed at many of the site allocations will release pockets of space between building plots for public greenspace which will improve the quality of landscape and create a more legible townscape across the sub-area.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	All existing open space is to be retained whilst new open space is proposed and enhanced green links will encourage urban greening, landscape enhancements and increase ecological resilience of the Ecology Restoration Area (LRA02: Peckham Town Centre, Camberwell Grove Street trees and Denmark Hill Station). There are limited large scale opportunities to enhance biodiversity and greenspace due to the sub-areas density.
IIAO 14	To reduce vulnerability to flooding	✓	✓	✓	✓	The sites within the Peckham area vision are within flood risk zones 1. All uses permitted on these sites in terms of flood risk.  Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	The area vision and site allocations should deliver a significant number of new homes across the area. If these are delivered to policy requirements they will offer a range of different units and tenures which will provide for a range of different needs and create inclusive residential schemes accessible to all groups.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	-	✓	✓	Ensuring the growth and vitality of the town centre will promote walkable neighbourhoods and green linkages and planned cycle ways will promote active transport modes which are anticipated to reduce reliance upon the private car.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	Support for new educational campuses will increase education provision and skills to improve employment opportunities for a wider proportion of Peckham's residents. Green links and the planned cycle networks will enhance connectivity across the sub-area. Potential for extra care homes provision across several of the sites within the sub-area recognises the importance of addressing a local need and ensure development will benefit all groups.

**NSP71: Aylesham Centre and Peckham Bus Station**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. The site will also ensure no retail floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	The provision of new retail and employment uses will allow staff to gain new skills whilst working in these establishments.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Through the provision of new green links, more opportunities are available for more active modes of transport which is good for both physical and mental health as well as more access to greenery and planting which also encourages good mental health.
			✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The site will now provide active frontages with town centre uses at ground floor facing Rye Lane and Peckham High Street. The activation of frontages, will open up spaces enabling natural surveillance of the area to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The potential provision of leisure, arts, culture or community uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions.
			ü✓	The site will improve connectivity for pedestrians by providing new green links which will help to reduce severance between communities and encourage community cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	Through the new green links being provided on site, this will help contribute to providing temperature regulation and improved air quality through providing more opportunities for more active modes of transport.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Through the new green links being provided on site, this will help contribute to providing improved air quality by encouraging more active modes of transport and reduce reliance on private vehicles.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	New development could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil

	quality of land and soils			quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	All existing open space is due to be retained and green links will be provided to improve connectivity to existing spaces
			✓✓	The site will provide enhanced public realm and civic space which will contribute to enhancing the local landscape and townscape around t the area by providing spaces between the buildings.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is within the setting of Rye Lane Peckham and Peckham Hill Street conversation areas. The site is also within the setting of Grade II listed Rye Lane Chapel and a group of listed buildings on Highshore Road. The site is also within the setting of a number of important unlisted buildings on Peckham High Street and Rye Lane, including Jones and Higgins Clock Tower and 43-49 Rye Lane.
				The site also lies within the Borough View of St Paul's Cathedral from One Tree Hill and lies within Tier 2 APA designation. The site is located in APA4 - Peckham Village.  Development will be respectful to the designations of conservation areas, listed buildings, protected views and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The new green links proposed will help to enhance green corridors.
IIAO 14	To reduce vulnerability to flooding	✓	✓	The site (SFRA Level II, Analysis 19) passes the sequential test which confirms 'more vulnerable' development, mixed use (residential, town centre, open space and community uses) is permitted in the Flood Zone 1.  A Basement Impact Assessment (BIA) will also be required for any development proposals incorporating new or extended basement areas.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes._The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	-	The site area may result in the loss of the bus station but only if it is surplus to requirements
			✓✓	The site will provide new north-south and east-west green links which will promote active lifestyles and help reduce the need to travel by car..
			✓✓	The site may also provide meanwhile uses within the car park, which reduces opportunities for car parking and therefore the use of private vehicles to and around the site
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could provide leisure, arts, culture or community uses. This could include leisure facilities' such as cinemas, swimming baths and gyms or community facilities like places of worship or health services, these are all important in encouraging community interaction and active, healthy lifestyles.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP72: Blackpool Road Business Park				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs during the construction and also once the development is completed which will tackle poverty and wealth creation.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Ensuring that the provision of employment space remains will allow staff to gain new skills whilst working in these establishments.
IIAO 3	To improve the health of the population	✓✓	✓✓	The site must provide new amenity space, this could enable opportunities for physical activities will encourage good physical health..
			✓✓	Enabling residents to participate in more physical activities also helps to encourage good mental health.
			✓✓	More job opportunities generated by employment space uplift will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The provision of new amenity space will help to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The provision of new amenity space, depending on the size could facilitate more opportunities for community interaction and cohesion.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	The provision of new amenity space would result in greener infrastructure which will help with temperature regulation which would help to reduce the impacts of climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	The site is required to improve permeability on site and provide new amenity space. This will help with providing more active modes of transport such as walking and cycling which reduce the use of cars and the impacts arising from car use such as gas emissions.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	New development could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	The redevelopment of the site will result in new amenity space this will help to soften the townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site lies between the Nunhead Green and Rye Lane Peckham Conservation Areas.
				The site is also in proximity of important undesignated heritage assets such as the railway viaduct and the Old Mill Building at 72 Copeland Road,

				<p>which is of local interest. Other Victorian heritage assets should be retained and enhanced, including former industrial buildings.</p> <p>Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	Redevelopment should complement the setting of existing open spaces.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The site (SFRA Level II, Analysis 18) passes the sequential test which confirms 'more vulnerable' development mixed use (employment, residential &amp; open space uses) is permitted in the Flood Zone 1.</p> <p>A Basement Impact Assessment (BIA) will also be required for any development proposals incorporating new or extended basement areas.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The site must retain or re-provide bus garage (sui generis), subject to need. Ensuring public transport is available for local destinations which provide more opportunities to rely less on cars for local trips.
			✓✓	The site is required to be more permeable, this will help with promoting more opportunities for walking and cycling to and through the site.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	-	The proposed site allocation does not have any effect on the achievement of the objective.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP73: Land between the railway arches (East of Rye Lane including railway arches)**

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within offices, and retail once the development is finished and during the construction which will tackle poverty and wealth creation.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	A wider provision of employment will help the population become more skilled particularly in commercial uses.
<b>IIAO 3</b>	To improve the health of the population	✓	✓	More job opportunities generated by employment space will help reduce poverty as an underlying determinant.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	-	-	The proposed site allocation does not have any effect on the achievement of the objective.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The site may also provide leisure and community uses for the benefit of the local community. This will encourage cultural, social and leisure related uses in the area, giving people more knowledge and understanding of different cultural beliefs and traditions, which will help to break down barriers to community cohesions
			✓	The site provides great opportunities to increase the linkages both to the north and east to west. This will create a more legible urban environment to avoid physical barriers and issues of severance.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	NSP policies require non residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon will help reduce our carbon footprint and our contribution to manmade climate change.
<b>IIAO 7</b>	To improve the air quality	✓	✓	NSP policy requires development to meet air quality neutral standards and improve air quality
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	New development could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	The site is adjacent to Nunhead Railway Embankments (Borough Open Land). All existing open space near the site will be retained.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site lies partially within the Rye Lane Peckham Conservation Area
				The site lies within the London panorama of St Paul's Cathedral from One Tree Hill viewing corridor.
				The site is in proximity of the Grade II listed Peckham Rye Station building. The site contains undesigned heritage assets including the railway viaduct and the C&A building, at 117-125 Rye Lane, which is an Art Deco building of local interest.
				The site is located outside of an Archaeological Priority Area, but in accordance with Historic England's 'Greater London Archaeological Priority Area Guidelines' and with the site being over 0.5 ha it should be acknowledged as a tier 4 designation within the APA tier system.

<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The site is adjacent to Nunhead Railway Embankments (Borough Open Land) Redevelopment should complement the setting of existing open spaces.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The site (SFRA Level II, Analysis 18) passes the sequential test which confirms 'less vulnerable' development mixed use (employment and town centre uses) is permitted in the Flood Zone 1. A Basement Impact Assessment (BIA) will also be required for any development proposals incorporating new or extended basement areas.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	-	-	The provision of housing is not expected at this site. As such the proposed site allocation does not have any effect on the achievement of the objective.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	-	No new green links are being provided; the proposed site does not have any effect on the achievement of the objective.
			✓	NSP policies require development to provide cycle storage to support development. This will ensure more active modes of transport in the area and reduce reliance on private vehicles.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	-	No new infrastructure will be provided as part of the development directly.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP74: Copeland Industrial Park and 1-27 Bournemouth Road

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will reinforce the town centre uses and will create jobs and boost the local economy. The site will therefore provide opportunities for employment, commercial, town centre and community uses during the construction phase and once the development is completed which will tackle poverty and wealth creation.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	A wider provision employment will help the population become more skilled particularly in commercial uses.
IIAO 3	To improve the health of the population	✓	✓	More job opportunities generated by employment space will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The provision of new amenity space will help to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The site may also provide leisure and community uses for the benefit of the local community. This will encourage cultural, social and leisure related uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	NSP policies require non residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon, this will help reduce our carbon footprint and our contribution to man made climate change.
IIAO 7	To improve the air quality	✓	✓	NSP policies require development to meet air quality neutral standards and improve air quality
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	New development could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	The site will provide public realm improvements which will have a positive impact on the landscape and townscape as a whole
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The site lies partially within the Rye Lane Peckham Conservation Area. The site contains undesignated heritage assets the Bussey building and 135 Rye Lane. No but as the site is over 0.5 ha it should be acknowledged as a tier 4 designation within the APA tier system. An archaeological assessment is required as the first stage of archaeological mitigation for this large site.  Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and	✓	✓	The site is not in close proximity to any open spaces however the public realm improvements could provide opportunities for additional greenery which would promote biodiversity

	biodiversity			
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The site (SFRA Level II, Analysis 18) passes the sequential test which confirms 'more vulnerable' development, mixed use (employment, residential, town and community) is permitted in the Flood Zone 1.</p> <p>A Basement Impact Assessment (BIA) will also be required for any development proposals incorporating new or extended basement areas.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	-	No new green links or being provided, the proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
			✓	NSP policies require development to provide cycle storage to support development. This will ensure more active modes of transport in the area and reduce reliance on the car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could provide leisure, arts, culture or community uses this could include leisure facilities such as cinemas, swimming baths and gyms or community facilities like places of worship or health services, these are all important in encouraging community interaction and active, healthy lifestyles.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

## AV15 Rotherhithe Area Vision

Including:

NSP75 – Rotherhithe Gasometer

NSP76 – St Olav’s Business Park, Lower Road

NSP77 – Decathlon Site and Mulberry Business Park

NSP78 – Harmsworth Quays, Surrey Quays Leisure Park, Surrey Quays Shopping Centre and Robert’s Close

NSP79 – Croft Street Depot

	AV10			NSP75	NSP76	NSP77	NSP78	NSP79	
	Area wide	S	M						L
IIAO 1	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	
IIAO 2	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	
IIAO 3	✓✓	-	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	
IIAO 4	✓✓	-	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	
IIAO 5	✓✓	x	✓	✓✓	✓✓	✓✓	✓✓	-	
IIAO 6	-	?	-	✓	✓✓	✓✓	✓✓	✓✓	
IIAO 7	-	?	-	✓	✓✓	✓	✓✓	✓	
IIAO 8	-	-	-	-	-	-	-	-	
IIAO 9	-	-	-	-	-	-	-	-	
IIAO 10	✓✓	-	✓	✓✓	-	-	-	-	
IIAO 11	✓✓	-	✓	✓✓	✓	✓	✓✓	✓	
IIAO 12	✓	-	✓	✓	✓	✓	✓	✓	
IIAO 13	✓	-	✓	✓	✓✓	✓	✓✓	✓✓	
IIAO 14	✓	✓	✓	✓	✓	✓	✓	✓	
IIAO 15	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	
IIAO 16	✓	-	✓	✓	✓✓	✓✓	✓✓	✓	
IIAO 17	✓✓	✓	✓✓	✓✓	✓	✓	✓✓	✓	
Avg.	65%	17%	56	71%	71%	65%	7%	74%	50%

**Integrated Impact Assessment for:**  
**AV15 Rotherhithe and site allocations NSP75 – 79 as follows:**

Rotherhithe Area Vision						
IIA Objective	Description	Area wide	Timescale			Commentary
			Short term	Medium term	Long term	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	On employment sites the re-provision of at least the equivalent level of employment floorspace or 50% of the sites total development capacity is safeguarded, whichever is greater. This will ensure no employment floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Development at Canada Water will transform the centre into a renewed shopping destination with a range of town centre activities including a leisure centre, entertainment facilities and daytime and evening activities around the basin. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposals promote the provision of a range of flexible employment spaces suitable for smaller businesses to create a diverse employment base, attracting a variety of different uses to provide a range of local job opportunities which cater to all groups. The transition away from light industrial uses could result in the loss of this type of job opportunity, although the anticipated uplift of employment space will mitigate the loss and ensure a varied employment base. Rotherhithe has enormous potential to provide new housing and commercial space, particularly in and around the Canada Water town centre. If these are delivered to policy requirements they will offer a range of different units and tenures which will provide for a range of different needs and create inclusive residential schemes accessible to all groups.
IIAO 2	To improve the education and skill of the population	✓✓	✓	✓✓	✓✓	The delivery of King's College campus (part of NSP77) encompasses teaching and student accommodation alongside a new sixth form college. This development will offer an important facility to educate future generations and substantially increase the proportion of skilled workers in the area, thus improving job opportunities and the proportion of higher paid jobs. The College may also be interested in building more teaching facilities which would provide a valuable facility at Canada Water. Under NSP policies significant levels of construction and uplift in employment space will provide jobs, apprenticeships and training in construction and in the completed development.
IIAO 3	To improve the health of the population	✓✓	-	✓✓	✓✓	Enhancement of green linkages and planned cycle networks will promote active lifestyles and help reduce the causes and exposure to poor air quality. Higher density development envisaged will free up space and routes between building plots to improve legibility and deliver new public spaces and green links (NSP75, NSP76 and NSP87) to promote social interaction and cohesion. More job opportunities generated by employment space uplift and town centre uses will help reduce poverty as an underlying determinant. The delivery of a new Health Centre at NSP78 will ensure sufficient, accessible and higher quality primary and community health services for a growing population.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	-	✓✓	✓✓	Improved permeability and activation of frontages will open up spaces to promote social interaction and the feeling of public safety. A vibrant mix of uses and high quality inclusive public realm enhancements will be accessible to all groups in order promote sense of community. Creating a new walkable town centre to replace the existing car-dominated big box retail park and leisure facilities in NSP77 and NSP78 will provide significant benefits for the perception of whether spaces are overlooked and the fear of crime.

IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	x	✓	✓✓	High quality and inclusive public realm enhancements will be accessible to all groups. Green linkages and planned cycle ways will create a more legible urban environment to avoid physical barriers and issues of severance. The area vision promotes the provision of a range of flexible employment spaces suitable for smaller businesses to create a diverse employment base, attracting a variety of different uses to provide a range of local job opportunities which cater to all groups and improve levels of unemployment as an underlying determinant. There may be disruptions to local communities from the concentration of largescale redevelopment in a localised area due to construction.
IIAO 6	To reduce contributions to climate change	-	?	-	✓	Green linkages and planned cycle ways will promote active and sustainable transport modes, improving air quality and reducing greenhouse gas emissions. Enhanced green linkages and new public spaces (NSP75 and NSP77) will encourage urban greening to adapt to the effects of climate change, reduce the urban heat island effect and increase ecological resilience in the Old Docks – centred around Rotherhithe core habitat area and the River Thames ecology restoration zone. Creating a new walkable town centre to replace the existing car-dominated big box retail park and leisure facilities in NSP77 and NSP78 will reduce car use and therefore CO2 emissions and contributions to climate change. CO2 emissions may suffer as a result of accelerated levels of construction and demolition. NSP policies seek to minimise carbon dioxide emissions from development.
IIAO 7	To improve the air quality	-	?	-	✓	Green linkages and planned cycle ways will promote active and sustainable transport modes, improving air quality and mitigating greenhouse gas emissions. Transition away from industrial uses (NSP75) and the typology of uses which host extensive surface car parks on NSP77 and NSP78 should improve air quality as well limiting the number of HGV's within the sub-area which should have a positive effect on air quality. NSP policies requires development to meet air quality neutral standards and improve air quality
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to try to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	✓✓	-	✓	✓✓	All site allocations promote the re-use of previously developed sites may provide opportunities to remediate contaminated land,. Given the scale of development anticipated, there will be significant opportunities to deliver a greenspace strategy across the sub-area which will improve the quality of land and soils
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	-	✓	✓✓	Development will be respectful to the designations of conservation areas and strategic viewing corridors where they apply. Given the scale of development anticipated, there will be significant opportunities to deliver a greenspace strategy across the sub-area to create an enhanced public realm and quality of landscape. Enhanced high-quality public realm should also provide for a much improved engaging townscape which allows for freer movement and social interaction. Creating a new walkable town centre to replace the existing car-dominated big box retail park and leisure facilities in NSP77 and NSP78 will provide significant benefits for townscape and landscape and pedestrian experience
IIAO 12	To conserve and enhance the historic environment	ü	-	✓	✓	Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical

	and cultural assets					assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	Green linkages and new public spaces (NSP75, NSP76, NSP77 and NSP78) will encourage urban greening to create an improved public realm and increase ecological resilience in the Old Docks – centred around Rotherhithe core habitat area and the River Thames ecology restoration zone. The strategic habitat corridor and living roof ecology proposals should further improve the areas biodiversity.
IIAO 14	To reduce vulnerability to flooding	✓	✓	✓	✓	The sites within the Rotherhithe vision are within flood risk zones 2 and 3 benefitting from defences. This means that where more vulnerable sites are proposed the exception test will be required to assess the benefits of the development and the flood risk mitigation measures proposed.  Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	Rotherhithe has enormous potential to provide new housing and commercial space, particularly in and around the Canada Water town centre. If these are delivered to policy requirements they will offer a range of different units and tenures which will provide for a range of different needs and create inclusive residential schemes accessible to all groups.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	-	✓	✓	The vision area already benefits from excellent public transport connections, supporting the intensification of development. Green linkages, planned cycle ways and station access improvements with Canada Water and the planned cycle network connecting with Rotherhithe Station will further promote active transport modes.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓✓	✓✓	The delivery of King's College campus encompasses teaching and student accommodation (part of NSP77) alongside a new sixth form college (NSP78). This development will offer an important facility to educate future generations and substantially increase the proportion of skilled workers in the area, thus improving job opportunities and proportion of higher paid jobs. The College may also be interested in building more teaching facilities which would provide a valuable facility at Canada Water. The delivery of a new Health Centre at NSP79 will ensure sufficient, accessible and higher quality primary and community health services for a growing population. Green linkages, planned cycle ways and station access improvements with Canada Water and the planned cycle network connecting with Rotherhithe Station will further promote active transport modes and accessibility to local services.

NSP75: Rotherhithe Gasometer

Site requirements:

Redevelopment of the site must:

- Provide new homes (C3); and
- Provide a new green link between Salter Road and Windrose Close.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide new homes as part of the development, this will provide opportunities for employment during the construction for the new homes being delivered.  This will help tackle poverty and wealth creation.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The site will enable skills to be developed amongst workers employed to undertake the construction of new homes.
IIAO 3	To improve the health of the population	✓✓	✓✓	The redevelopment will also bring forward positive impacts on walkability and connectivity with green pedestrian links, providing a new green link between Salter Road and Windrose Close. This will contribute to enabling active lifestyles and mental well-being.
			✓✓	The redevelopment will also draw on its proximity to open water and green spaces, including Surrey Water and Deal Porters Walk, to promote the access to the open space. Access to open space and greenery and calming environments has positive effects on mental health.
			✓✓	Improved connectivity to open space creates improved opportunities for physical activities such as play and open-air sports facilities, enabling exercise which supports good physical health and mental health as well as facilitate relaxation and socialising is also beneficial for health and well and being.
			✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The creation of new green links will combat severance between communities and encourage community interaction
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	The improved connectivity and walkability within the site and the wider area promotes active travel modes including walking and cycling, thus reducing the reliance on private vehicles and lowering the use of fossil fuels. Although demand for building materials and construction waste will be generated with redevelopment, the NSP policies will ensure the development to achieve carbon neutral through thoughtful design and offset contributions.

<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Prioritising walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality. In addition, NSP policies require development to meet air quality neutral standards and improve air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	New development could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	NSP policies require development to be reflective of the existing townscape. The site is in proximity to Deal Porters Walk (Borough Open Land) and is within the setting of the undesignated heritage asset Surrey Water Basin (Open Water Space). Development on the site will need to be developed in a sensitive manner within the context of these assets.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site includes an undesignated gas container which is recognised across London as a heritage asset and appropriate safeguards are required for their preservation and/or recording. Consideration should be given to the potential for innovative design solutions such as retention of the gasometer. The site is in proximity of the Grade II listed Surrey Lock.  The site is also a Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads.  Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The redevelopment will provide a new green link between Salter Road and Windorse Close which will improve connectivity to open spaces.
			✓	NSP policy, P59 Biodiversity requires development to contribute to biodiversity gains 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.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level 2 - Analysis 20) will have a "more vulnerable" use (residential) in Flood Zone 3 defended, and therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk.  The site development will bring sustainability benefits as follows: <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved green links will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- The creation of new green links will combat severance between communities and encourage community interaction</li> <li>- Priority in walking and cycling in the design requirement of the site will promote active travel modes and reduce the incentive of driving, thus improving air quality and contributing to reduction in greenhouse emissions</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the SFRA including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development</p>

				<p>proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. A Basement Impact Assessment (BIA) for non residential development will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>In light of the above, it is concluded the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve the health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	- ✓✓	Through enhancing the pedestrian subway, the prescribed requirements will effectively promote walking and reduce the reliance on private vehicles.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	-	No new infrastructure will be provided as part of the development directly.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP76: St Olav's Business Park, Lower Road

Site requirements

Redevelopment of the site must:

- Provide replacement at least the amount of employment floorspace (B, E(g), use class) currently on the site; and
- Provide increased permeability across the site; and
- Provide high quality public realm at the centre and at the confluence of three routes:
  1. from Christopher Jones Square the open space to the south; and
  2. the crossing to Southwark Park; and
  3. the retail frontage on Albion Street.

Redevelopment of the site should:

- Provide new homes (C3);
- Provide active frontages at ground floor level.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for jobs within offices, retail, once the development is finished and during the construction which will tackle poverty and wealth creation.
			✓✓	Under NSP policies, development of this nature will secure local jobs and opportunities for local businesses to tender for procurement
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	A wider provision of employment will help the population become more skilled particularly in commercial uses.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space will help reduce poverty as an underlying determinant.
			✓✓	New residential provision on site will help meet the housing needs and address overcrowding as an issue, which is one of the key determinants of health
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability and the activation of frontages along Albion Street, will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Improved permeability across the site will combat severance between communities and encourage community interaction

			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	NSP policies require non residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon which will help reduce our carbon footprint and our contribution to manmade climate change.
<b>IIAO 7</b>	To improve the air quality	✓	✓	NSP policy requires development to meet air quality neutral standards and improve air quality
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	New development could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	The site boundary is in proximity to Christopher Jones Square (Other Open Space) and Southwark Park (Metropolitan Open Land). Development on the site will be developed in a sensitive manner within the context of these assets as well as protect the character of the existing townscape..
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The site is within the setting of King Edward III Conservation Area.</p> <p>The site is in proximity of Grade II listed buildings the Rotherhithe War Memorial, St Olaf's Church and the archway to Rotherhithe tunnel approach.</p> <p>Part of the site lies within the LVMF view 5A.2, Greenwich Park Wolfe Statue to Tower Bridge and St Paul's Cathedral. On the western edge of the site development should respect the Designated View (LVMF 5A.2) avoiding any incursion into the Landmark Viewing Corridor including its Wider Setting Consultation Area and respecting the setting of St Olaf Church.</p> <p>The site is located outside of an Archaeological Priority Area, but important archaeological deposits have been recorded in this area. The site is also over 0.5ha and as a result should be acknowledged as a tier 4 designation within the APA tier system. An archaeological assessment of this large site is required to assess archaeological significance.</p> <p>Development will be respectful to the designations of conservation areas, listed buildings, areas of archaeological significance and protected views and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	<p>The site boundary is in proximity to Christopher Jones Square (Other Open Space) and Southwark Park (Metropolitan Open Land).</p> <p>Redevelopment should complement the setting of existing open spaces.</p>
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 20) will have a "more vulnerable" use mixed use (residential, employment and retail) in Flood Zone 3. Development on this site therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will provide opportunities for jobs within offices, retail, once the development is finished and during the construction which will tackle poverty and wealth creation</li> </ul>

				<ul style="list-style-type: none"> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- Development of this nature will secure local jobs and opportunities for local businesses to tender for procurement</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing. It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Improved permeability across the site will combat severance between communities and encourage community interaction</li> <li>- Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space, the conservation area, heritage assets and the borough view, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> <li>- The accessibility to Christopher Jones Square (Other Open space) and Southwark Park (Metropolitan Open Land) will promote the public appreciation of the significant green space and improve the green linkages. As such it will promote the green corridors and biodiversity</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. No basement dwellings should be permitted within this area. A Basement Impact Assessment (BIA) for non residential development will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>In light of the above, it is concluded the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Through enhancing the pedestrian subway, the prescribed requirements will effectively promote walking and reduce the reliance on private vehicles.
			✓✓	NSP policies require development to provide cycle storage to support development. This will ensure more active modes of transport in the area and reduce the need to travel by car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	-	No new infrastructure will be provided as part of the development directly.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP77 – Decathlon Site and Mulberry Business Park**

Site requirements

Development of the site must:

- Provide retail uses; and
- Provide community use; and
- Provide enhanced public realm and civic space; and
- Provide employment floorspace (E(g), B use class).

Development of the site should

- Provide new homes (C3);

Development of the site may

- Provide leisure uses); and
- Provide student accommodation (sui generis).

Relevant planning applications:

12/AP/4126

CANADA WATER SITES C AND E, SURREY QUAYS ROAD, LONDON SE16 2XU the site will include 1030 residential units, Class A1 retail store (including 10,178sq.m (net) sales area, 745sq.m ancillary office accommodation and 308sq.m ancillary cafe); up to 4,352.3sq.m of other retail (Class A1/A2/A3/A4 floorspace); up to 2,800sq.m of office space floorspace (Class B1), up to 658sq.m of health centre floorspace (Class D1) and up to 698.2sq.m of cinema floorspace (Class D2); 19,486.5sq.m ancillary parking (equating to up to a maximum of 466 parking spaces), plant and storage accommodation, including the provision of basements to provide vehicle and cycle parking, circulation, servicing and plant areas; new vehicle and pedestrian accesses and new public amenity space and landscaping including new public square

13/AP/1429

FORMER MULBERRY BUSINESS PARK, LAND BOUNDED BY CANADA STREET, QUEBEC WAY AND HARMSWORTH QUAYS PRINT WORKS, LONDON SE16 the site will include comprising 770 student bedrooms with related living/kitchen and communal spaces (sui generis); 33 affordable residential units (Class C3); 610sqm retail uses (Classes A1, A2,A3); 322sqm health centre (Class D1); 75sqm area of retail (Classes A1, A2, A3) or alternate non-residential institutional use (Class D1); 4,490sqm offices (Class B1); associated car parking, cycle parking and landscaped public realm; new vehicular and pedestrian access/egress and associated works.

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will provide opportunities for employment, retail, and community uses during the construction phase and once the development is complete which will tackle poverty and wealth creation.
			✓✓	Under NSP policies, development of this nature will secure local jobs and opportunities for local businesses to tender for procurement.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	A wider provision of employment will help the population become more skilled particularly in commercial uses.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space will help reduce poverty as an underlying determinant.
			✓✓	New residential provision on site will help meet the housing needs and address the overcrowding issue, which is one of the key determinants of health
The site will accommodate improved walking routes to Canada Water Station and to public open spaces. The schemes will also provide				

			✓✓	links to existing cycle routes and proposed Cycle Super Highway. Encouraging more active modes of transport will promote active lifestyles and mental well-being.
			✓✓	The delivery of a new health centre at the former Mulberry Business Park, will ensure sufficient, accessible and higher quality primary and community health services for a growing population.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Improved permeability across the site will help combat severance between communities and encourage community interaction
			✓✓	The scheme will provide leisure uses (A cinema) on site which will provide entertainment and arts facilities to the community at large which can help to encourage more community interaction.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	NSP policies require non residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon will help reduce our carbon footprint and our contribution to manmade climate change.
			✓✓	Green linkages and planned cycle ways will promote active and sustainable transport modes, improving air quality and reducing greenhouse gas emissions. Enhanced green linkages and new public spaces will encourage urban greening to adapt to the effects of climate change, reduce the urban heat island effect and increase ecological resilience. Creating a new walkable town centre to replace the existing car-dominated big box retail park and leisure facilities will reduce car use and therefore CO2 emissions and contributions to climate change.
			-	CO2 emissions may suffer as a result of accelerated levels of construction and demolition. NSP policies seek to minimise carbon dioxide emissions from development.
IIAO 7	To improve the air quality	✓✓	✓✓	NSP policy requires development to meet air quality neutral standards and improve air quality.

			✓✓	Green linkages and planned cycle ways will promote active and sustainable transport modes, improving air quality and mitigating greenhouse gas emissions
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	New development could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	The site will provide new public amenity space and landscaping including new public square. Enhanced high-quality public realm should also provide for a much improved engaging townscape which allows for freer movement and social interaction.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site is in proximity to Grade II listed Former Dock Manager's Offices.. Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads. Development will be respectful to the designations of listed buildings, and areas of archaeological significance and has been designed in a way which seeks to conserve the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The site includes Canada Water Basin (Open Water Space) and is within the setting of Greenland Dock (Open Water Space). The proposed development includes a new public space with lawn and wildflower planting, biodiverse roofs and food growing area. Tree planting is also proposed to generate a net gain in tree numbers and enhancement of green links to Greenland Dock. The proposed development is also required to provide additional features such as bird and bat boxes within the development, and mitigation of impacts during construction by condition. The above measures all contribute to enhancing green corridors, providing additional open space and contributing to biodiversity within the borough.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level 2 - Analysis 22) will have a "more vulnerable" use mixed use (residential, employment and retail) in Flood Zone 3. Development on this site therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows: <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will provide opportunities for jobs within offices, retail, once the development is finished and during the construction which will tackle poverty and wealth creation</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- Development of this nature will secure local jobs and opportunities for local businesses to tender for procurement</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing. It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Improved permeability across the site will combat severance between communities and encourage community interaction</li> <li>- Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety</li> </ul>

				<p>- The site is required to develop in a sensitive manner to the listed buildings, the open space, the conservation area, heritage assets and the borough view, and reflect existing building heights, so as to respect the local character, heritage and townscape</p> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. No basement dwellings should be permitted within this area. A Basement Impact Assessment (BIA) for non residential development will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>Both applications relevant to the site have submitted site specific flood risk assessments with a number of measures to reduce risk of flooding as a result of the development including flood resilient design measures as part of the construction, and proposing finished floor levels 300mm above AOD. The Environment Agency were consulted during the planning process and they have advised that they would have no objection to the proposals.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Green linkages, planned cycle ways and station access improvements with Canada Water and the planned cycle network connecting with Rotherhithe Station will further promote active transport modes.
			✓✓	NSP policies require development to provide cycle storage to support development. This will ensure more active modes of transport in the area and reduce the need to travel by car.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The delivery of a new health centre will ensure sufficient, accessible and higher quality primary and community health services for a growing population.
			✓✓	The scheme will provide D2 uses (A cinema) on site which will provide entertainment and arts facilities to the community at large which can help to encourage more community interaction.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

### Site requirements

#### Development of the site must:

- Provide retail uses; and
- Provide a new health centre (E€) of approximately 2,000 m<sup>2</sup>; and
- Provide new education places for 14-19 year olds (F.1(a)); and
- Provide new homes (C3); and
- Provide enhanced public realm and civic space; and
- Provide employment floorspace (E(g), B); and
- Provide leisure uses.

#### Development of the site may:

- Provide student accommodation (sui generis); and
- Provide new visitor accommodation (C1); and
- Provide extra care housing (C2); and
- Provide leisure, arts, culture or community uses.

### Relevant planning applications:

18/AP/1604

Canada Water Masterplan - Land Bounded By Lower Road (West)  
Redriff Road (South)  
Quebec Way (East)  
Surrey Quays Road And Canada Water Dock (North)  
And Site At Roberts Close  
London SE16

Hybrid application seeking detailed planning permission for Phase 1 and outline planning permission for future phases, comprising:

Outline planning permission (all matters reserved) for demolition of all existing structures and redevelopment to include a number of tall buildings comprising the following mix of uses: retail (Use Classes A1-A5), workspace (B1), hotel (C1), residential (C3), assisted living (C2), student accommodation, leisure (including a cinema)(D2), community facilities (including health and education uses)(D1), public toilets, nightclub, flexible events space, an energy centre, an interim and permanent petrol filling station, a primary electricity substation, a secondary entrance for Surrey Quays Rail Station, a Park Pavilion, landscaping including open spaces and public realm, works to Canada Water Dock, car parking, means of access, associated infrastructure and highways works, demolition or retention with alterations to the Press Hall and/or Spine Building of the Printworks; and

Detailed planning permission for the following Development Plots in Phase 1:

Plot A1 (south of Surrey Quays Road and west of Deal Porters Way) to provide uses comprising retail (A1-A5), workspace (B1) and 186 residential units (C3) in a 6 and 34 storey building, plus basement;  
Plot A2 (east of Lower Road and west of Canada Water Dock) to provide a leisure centre (D2), retail (A1-A5), and workspace (B1) in a 4, 5 and 6 storey building, plus basement;  
Plot K1 (east of Roberts Close) to provide 79 residential units (C3) in a 5 and 6 storey building;  
Interim Petrol Filling Station (north of Redriff Road and east of Lower Road) to provide a petrol filling station with kiosk, canopy and forecourt area.  
Each Development Plot with associated car parking, cycle parking, landscaping, public realm, plant and other relevant works.

The application is accompanied by an Environmental Statement pursuant to the Town and Country Planning (EIA) Regulations 2011 (amended)

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site provides an opportunity to expand the town centre eastwards to incorporate uses and activities which will reinforce the town centre, create jobs and boost the local economy.  The site will therefore provide opportunities for employment, commercial, town centre and community uses during the construction phase and once

				the development is completed which will tackle poverty and wealth creation.
			✓✓	Under NSP policies, development of this nature will secure local jobs and opportunities for local businesses to tender for procurement.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	A wider provision of employment will help the population become more skilled particularly in commercial uses.
			✓	Development on this site will support the education of students by providing student accommodation to facilitate their learning experience.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space will help reduce poverty as an underlying determinant.
			✓✓	New residential provision on site will help meet the housing needs and address overcrowding as an issue, which is one of the key determinants of health
			✓✓	The site will accommodate improved walking routes to Canada Water Station and to public open spaces. The schemes will also provide links to existing cycle routes and the proposed Cycle Super Highway, encouraging more active modes of transport which will promote active lifestyles and mental well-being.
			✓✓	The delivery of a new health centre will ensure sufficient, accessible and higher quality primary and community health services for a growing population.
			xx	The provision of A5 (hot food takeaways) could contribute to unhealthy eating and obesity
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Improved permeability across the site will help combat severance between communities and encourage community interaction
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion

			✓✓	The scheme will provide leisure uses (a cinema) , community facilities (including health and education uses), public toilets, nightclub, flexible events space on site which will provide entertainment ,arts and community facilities to the community at large which can help to encourage more community interaction and community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	NSP policies require non residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon which will help reduce our carbon footprint and our contribution to manmade climate change.
			✓✓	Green linkages and planned cycle ways will promote active and sustainable transport modes, improving air quality and reducing greenhouse gas emissions. Enhanced green linkages and new public spaces will encourage urban greening to adapt to the effects of climate change, reduce the urban heat island effect and increase ecological resilience. Creating a new walkable town centre to replace the existing car-dominated big box retail park and leisure facilities will reduce car use and therefore CO2 emissions and contributions to climate change. CO2 emissions may suffer as a result of accelerated levels of construction and demolition. NSP policies seek to minimise carbon dioxide emissions from development.
IIAO 7	To improve the air quality	✓✓	✓	NSP policy requires development to meet air quality neutral standards and improve air quality.
			✓✓	Green linkages and planned cycle ways will promote active and sustainable transport modes, improving air quality and mitigating greenhouse gas emissions
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
IIAO 9	To encourage sustainable use of water resources	-	-	New development could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	The site will provide and new public amenity space and landscaping including new public square. Enhanced high-quality public realm should also provide for a much improved engaging townscape which allows for freer movement and social interaction.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	St Mary's Rotherhithe and the Edward III's Rotherhithe Conservation Areas are located around 400m north of this site. The site is in proximity to Grade II listed Former Dock Manager's Offices and Grade II listed turntable and machinery of former swing road bridge. Part of the site lies within the LVMF view 5A.2 Greenwich Park Wolfe Statue to Tower Bridge and St Paul's Cathedral.  Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Roads. Development will be respectful to the designations of conservation areas, listed buildings, protected views, and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The site includes Canada Water Basin (Open Water Space) and is within the setting of Greenland Dock (Open Water Space).
				Green linkages and new public spaces will encourage urban greening to create an improved public realm and increase ecological resilience in the Old Docks – centred around Rotherhithe's core habitat area and the River Thames ecology restoration zone. The strategic habitat corridor and living roof ecology proposals should further improve the areas biodiversity
IIAO 14	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level 2 - Analysis 22) will have a "more vulnerable" use mixed use (residential, employment and retail) in Flood Zone 3. Development on this site therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site is subject to a hybrid planning application (18/AP/1604) for the Canada Water masterplan. The overall development will bring sustainability benefits as follows:

- A minimum of 2,000 new homes (Class C3)
- A minimum of 35% affordable homes across the site;
- A minimum of 500,000sq ft (GIA)(46,452sqm) workspace including affordable workspace;
- Providing up to 30,000 new jobs
- A minimum of 500,000sq ft (GIA)(46,452sqm) retail (Class A1) and leisure (D2) space, including a new cinema.
- A new leisure centre
- A new health centre
- A new town square and public realm
- A new park
- Electric vehicle charging points
- New station entrance and ticket hall for Surrey Quays station
- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty
- The site will provide opportunities for jobs within offices, retail, once the development is finished and during the construction which will tackle poverty and wealth creation
- The site will enable skills to be developed by workers who are employed to carry out the construction
- Development of this nature will secure local jobs and opportunities for local businesses to tender for procurement
- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
- By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing. It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health
- Improved frontages and permeability will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes
- Improved permeability across the site will combat severance between communities and encourage community interaction
- Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety
- The site is required to develop in a sensitive manner to the listed buildings, the open space, the conservation area, heritage assets and the borough view, and reflect existing building heights, so as to respect the local character, heritage and townscape

The officer's report for the application assessment notes that generally, the site is at low risk of flooding and through the implementation of a site-wide sustainable drainage strategy, the risk of flooding would not be increased elsewhere. The site benefits from the strategic flood defences along the Thames, but in the unlikely event that these defences were breached, some isolated pockets of the site that are lower lying could be susceptible to fluvial flooding. This is the case for Zone M and parts of Zone F of the masterplan application, nearest to the underpass leading to Greenland Dock. This would need to be further considered in the detailed Flood Risk Assessments presented at the Reserved Matters stage for buildings in these Zones. Groundwater flooding could be encountered during basement excavation and a condition is secured to ensure that the foundation design responds accordingly and that appropriate monitoring is in place. The risk of surface water flooding across the site is very low, with the exception of very localised issues.

To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. No basement dwellings should be permitted within this area. A site-specific FRA has been provided with the masterplan application which confirms the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. The Environment Agency, the Council's flood risk team and the flood risk consultants. Waterman, agreed the flood risk and drainage principles of the site.

The site specific flood risk assessment with a number measures to reduce risk of flooding as a result of the development including the use of sustainable urban drainage systems such as green roofs, swales, tree pit storage and rain gardens. The Environment Agency were consulted during the planning process and they have advised that they would have no objection to the proposal providing certain conditions were attached to the planning permission to manage the risk of contamination. Relevant conditions have been attached to the planning permission.

The SFRA Level 2 (Analysis 20) shows the site of the Rotherhithe Police station is more highly vulnerable in terms of flood risk. The SFRA notes there may be certain specific circumstances in which development on this site could be permitted. The FRA submitted with the application

				<p>masterplan notes this area is in Development Zone M. This is part of the outline application and further detail would be submitted at Reserved Matters stage. However the masterplan indicates this is the likely site for the proposed health centre on the ground floor, with residential units above. The FRA notes the health centre would only be open during the day, with no overnight patients. The breach flood level adjacent to Development Zone M is indicated to be 2.77m AOD. Based on a minimum proposed ground level of 1.80m AOD the ground floor could potentially be affected by up to 0.97m of flooding in a breach scenario. In the highly unlikely scenario of a breach in the defences coinciding with a storm surge there may not be access to the upper levels, but users of the health centre and retail units would be able to travel a short distance (90m) to the east to areas of dry ground. The upper levels of Development Zone M would remain safe in the event of a breach scenario.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Green linkages, planned cycle ways and station access improvements and the planned cycle network connecting with Rotherhithe Station will further promote active transport modes.
			✓✓	NSP policies require development to provide cycle storage to support development. This will ensure more active modes of transport in the area and reduce the need to travel by car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The scheme will provide D2 uses (A cinema ), community facilities (including health and education uses) (D1), public toilets, a nightclub and a flexible events space on site which will provide entertainment ,arts and community facilities to the community at large.
			✓✓	The delivery of a new health centre will ensure sufficient, accessible and higher quality primary and community health services for a growing population.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

NSP79 – Croft Street Depot

Site requirements

Redevelopment must:

- Provide at least the amount of employment floorspace currently on the site (B use class) as small business workspace (B1) or a storage depot (B8).

Redevelopment of the site may should:

- Provide new homes (C3)

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for employment during the construction phase which will tackle poverty and wealth creation.
			✓✓	Under NSP policies, development of this nature will secure local jobs and opportunities for local businesses to tender for procurement.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	A wider provision of employment uses will help the population become more skilled particularly in commercial uses.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space will help reduce poverty as an underlying determinant.
			✓✓	New residential provision on site will help meet the housing needs and address overcrowding as an issue, which is one of the key determinants of health
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Active edges, will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	NSP policies require non residential buildings to achieve a BREEAM rating of excellence. This ensures buildings are energy efficient and low carbon will help reduce our carbon footprint and our contribution to manmade climate change.

<b>IIAO 7</b>	To improve the air quality	✓	✓	NSP policies require development to meet air quality neutral standards and improve air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	New development could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	-	-	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	Although the site is not located in an Archaeological Priority Area, a Roman coin hoard was reported from Chilton Grove nearby.  Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	-	-	The site allocation does not have any effect on the achievement of the objective.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level 2 - Analysis 22) will have a “more vulnerable” use mixed use (residential, employment and retail) in Flood Zone 3. Development on this site therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will provide opportunities for jobs within offices, retail, once the development is finished and during the construction which will tackle poverty and wealth creation</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- Development of this nature will secure local jobs and opportunities for local businesses to tender for procurement</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing. It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved permeability across the site will combat severance between communities and encourage community interaction</li> <li>- Improved permeability and activation of frontages, will open up spaces to promote social interaction and the feeling of public safety</li> <li>- The site is required to develop in a sensitive manner to the listed buildings, the open space, the conservation area, heritage assets and the borough view, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood</p>

				<p>risk elsewhere, and, where possible, reducing flood risk overall. No basement dwellings should be permitted within this area. A Basement Impact Assessment (BIA) for non residential development will be separately required for any development proposals incorporating new or extended basement areas.</p> <p>As such, the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	NSP policies require development to provide cycle storage to support development. This will ensure more active modes of transport in the area and reduce the need to travel by car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	-	No new infrastructure will be provided as part of the development directly.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

AV.16 Walworth Area Vision

**Walworth Area Vision and site allocations NSP80 – NSP82 as follows:**

- NSP80: Morrison’s, Walworth Road
- NSP81: 330-344 Walworth Road
- NSP82: Chatelaine House, Walworth Road

	AV.16				NSP80:	NSP81:	NSP82:
	Area wide	S	M	L			
IIAO 1	✓	✓	✓	✓	✓✓	✓✓	✓✓
IIAO 2	✓	✓	✓	✓	✓✓	✓✓	✓✓
IIAO 3	✓	-	✓	✓	✓✓	✓✓	✓✓
IIAO 4	✓	-	-	✓	✓✓	✓✓	✓✓
IIAO 5	✓✓	x	✓	✓✓	✓✓	✓✓	✓✓
IIAO 6	✓	-	-	✓	✓✓	✓✓	✓✓
IIAO 7	✓	-	-	✓	✓✓	✓✓	✓✓
IIAO 8	-	-	-	-	-	-	-
IIAO 9	-	-	-	-	-	-	-
IIAO 10	-	-	-	-	-	-	-
IIAO 11	✓✓	✓	✓	✓✓	-	✓	✓
IIAO 12	✓	-	✓	✓	✓	✓	✓
IIAO 13	✓	-	✓	✓	✓	✓	✓
IIAO 14	✓	✓	✓	✓	✓	✓	✓
IIAO 15	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 16	✓	-	✓	✓	✓✓	✓✓	✓✓
IIAO 17	✓	-	✓	✓	✓✓	✓✓	✓✓

Avg.	50%	12%	35%	50%	68%	71%	71%
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## Integrated Impact Assessment for:

Walworth Area Vision and site allocations NSP80 – NSP83 as follows:

- NSP80: Morrison's, Walworth Road
- NSP81: 330-344 Walworth Road
- NSP82: Chatelaine House, Walworth Road

Walworth Area Vision						
IIA Objective	Description	Area wide	Timescale			Commentary
			S	M	L	
IIO 1	To tackle poverty and encourage wealth creation	✓	✓	✓	✓	The area vision for Walworth seeks to improve the retail and service offer of Walworth Road and East Street Market shopping environment, including shop front improvements and enhance the development of the low-line adjacent to the historic railway arches, with lively accessible public spaces for creativity, new jobs and retail. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Walworth has the potential to provide a significant number of new homes, particularly in the former Aylesbury Estate where there will be over 4000 new homes, new community facilities and improvements to the street network.
IIO 2	To improve the education and skill of the population	✓	✓	✓	✓	Under NSP policies, construction and uplift in employment space will provide training in construction and in the final development.
IIO 3	To improve the health of the population	✓	-	✓	✓	Enhancement of the low-line walking route, green links and planned cycle networks will promote active lifestyles and connect with significant greenspace assets such as Burgess Park. The improvement and expansion of public spaces such as Nursery Row Park will offer additional areas for leisure and recreation which promote social interaction. More job opportunities generated by employment space uplift and town centre uses will help reduce poverty as an underlying determinant. Improvement of sustainable transport links and connectivity enhancements will improve access to employment opportunities and other facilities for all existing and future residents. The potential loss of the gym at NSP81 will be mitigated by the provision of new community facilities outlined in the redevelopment of the Aylesbury Estate.
IIO 4	To reduce the incidence of crime and the fear of crime	✓	-	-	✓	Improved permeability and activation of frontages, particularly along the low-line route, will open up spaces to promote social interaction and the feeling of public safety. High quality and inclusive public realm enhancement accessible to all groups will promote an enhanced sense of community.
IIO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	x	✓	✓✓	High quality and inclusive public realm enhancements will be accessible to all groups. Low-line, green links and planned cycle ways will create a more legible urban environment to avoid physical barriers and issues of severance. New public spaces and the mix of uses proposed along Walworth Road and East Street will create vibrant destinations, drawing together a variety of groups to promote social cohesion and encouraging further inward investment. Parts of Walworth are within the most deprived areas in Southwark and these communities may be particularly susceptible to the disruptions of concentrated largescale redevelopment in a localised area, although they also should be the communities who could benefit most in the long term.
IIO 6	To reduce contributions to climate change	✓	-	-	✓	Low-line, green links and planned cycle ways will promote sustainable modes, improving air quality and reducing greenhouse gas emissions. Enhanced green linkages and new public spaces will encourage urban greening to adapt to the effects of climate change, reduce the urban heat island effect and increase ecological resilience of the Heygate and Aylesbury development local restoration area. Although improved public transport should help to address congestion particularly around the crossroads in Camberwell, CO2 emissions could still be exacerbated by accelerated levels of construction and demolition. NSP policies seek to minimise carbon dioxide emissions from development to offset this impact.
IIO 7	To improve the air quality	✓	-	-	✓	Low-line, green links and planned cycle ways will promote active transport modes, helping to address the causes of poor air quality. Air quality in the area may suffer in the short and medium term as a result of accelerated levels of construction and demolition, particularly around the Aylesbury Estate. However the principle of estate's redevelopment has already been subject to an adopted site allocation in the Aylesbury Area Action Plan, and two phases have already completed. The result of the estate has been granted full and outline planning permission, The reserved matters of the outline planning permission will be subject to NSP policies which requires development to meet air quality neutral standards and improve air quality
IIO 8	To avoid waste and maximise, reuse or recycle	-	-	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with

	waste arising as a resource					the waste management hierarchy
IIAO 9	To encourage sustainable use of water resources	-	-	-	-	Uplift in employment and residential floorspace could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIAO 10	To maintain and enhance the quality of land and soils	-	-	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓	✓	✓✓	Development will be respectful to the designations of conservation areas where they apply. All existing open space is to be retained whilst new open space proposed will encourage urban greening and landscape enhancements. Enhanced high-quality public realm should provide for a much improved townscape. The increased densities proposed at many of the site allocations will release pockets of space between building plots for public greenspace which will improve the quality of landscape and create a more legible townscape across the sub-area.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	-	✓	✓	Development will be respectful to the designations of conservation areas, listed buildings and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	-	✓	✓	All existing open space is to be retained whilst new open space is proposed and enhanced green links will encourage urban greening and landscape enhancements. The aspirations of the Heygate and Aylesbury development local restoration area should improve the areas biodiversity.
IIAO 14	To reduce vulnerability to flooding	✓	✓	✓	✓	The sites within the Walworth vision are within flood risk zones 3 benefitting from defences. This means that where more vulnerable sites are proposed the exception test will be required to assess the benefits of the development and the flood risk mitigation measures proposed.  Developing at higher densities could free up more space for landscape enhancements and flood mitigation measures as part of new and improved open spaces and public realm. NSP policies require flood risk to be reduced through implementing onsite sustainable urban drainage measures.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	Walworth has the potential to provide a significant number of new homes, particularly in the former Aylesbury Estate where there will be over 4000 new homes, new community facilities and improvements to the street network.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	-	✓	✓	Low-line, green links and planned cycle ways will improve access to local services as well as connections with the nearby underground and rail stations at Elephant and Castle, providing convenient onward travel to destinations across London. These measures should encourage the use of sustainable and active transport modes and limit reliance upon the private car.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓	-	✓	✓	Walworth has the potential to provide a significant number of new homes, particularly in the former Aylesbury Estate where there will be over 4000 new homes, new community facilities and improvements to the street network. Low-line, green links and the planned cycle networks will enhance connectivity across the sub-area to improve accessibility to local services and nearby centres such as Elephant and Castle.

**NSP80: Morrison's, Walworth Road**

**Site requirements**

Redevelopment of the site must:

- Retain the supermarket retail use (E(a)); and
- Provide new homes (C3); and
- Support the Low Line walking route adjacent to the railway viaduct.

Redevelopment of the site may:

- Provide other town centre uses including retail, community, leisure and employment uses

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs once the development is finished and during the construction which will tackle poverty and wealth creation. The site will also ensure no retail floorspace is lost and in many cases will provide uplift in employment space leading to increased local job opportunities. Under NSP policies this will secure local jobs and opportunities for local businesses to tender for procurement. Proposed uses will help diversify the economy by attracting a variety of different employment types, helping to reduce the rate of unemployment and consequently substantially reduce the levels of poverty.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new retail, community and leisure will allow staff to gain new skills whilst working in these establishments.
IIAO 3	To improve the health of the population	✓✓	✓✓	Enhancement of the low-line walking route, improved accessibility to bus stops and the existing cycle network will provide more opportunities for more active modes of transport which is good for both physical and mental health
			✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability and activation of frontages, particularly along the low-line route, will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The potential provision of D uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions.
			✓✓	The site will improve connectivity for pedestrians through the enhancement of the low line walking route, this will create a more legible urban environment to avoid physical barriers and issues of severance.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Low-line and planned cycle ways will promote sustainable modes, improving air quality and reducing greenhouse gas emissions.
IIAO 7	To improve the air quality	✓✓	✓✓	Sustainable modes of transport such as walking and cycling reduce air emissions which will help contribute to providing improved air quality more active modes of transport and less reliance on cars.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate

	as a resource			management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	New development could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	-	-	The site is not in close proximity to any open spaces as such the site allocation has no bearing on this objective.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	<p>The site lies within the Walworth Road Conservation Area.</p> <p>The site is within proximity of Grade II listed building Manor Place Baths and 33 Penrose, Street and buildings of townscape merit along Walworth Road. It adjoins the important undesignated heritage asset of the railway viaduct to the rear. The site is within the Walworth Heritage Action Zone (HAZ).</p> <p>The site lies just outside of the Borough View of St Paul's Cathedral along Camberwell Road.</p> <p>Tier 2 APA designation. The site is located in APA2 - Walworth Village</p> <p>Development will be respectful to the designations of conservation areas, listed buildings, protected views and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.</p>
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	-	The site does not have any direct impact on this objective.
			✓	NSP policies require biodiversity measures to be incorporated in to the development such as green and brown roofs and bat boxes
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level II, Analysis 21) will have a "more vulnerable" use, mixed use (residential, town centre, employment and community) in Flood Zone 3 benefitting from defences. This therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk. The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and access to the lowline will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Redevelopment will support the low line walking route adjacent to the railway viaduct. More active modes of transport will encourage improved physical health</li> <li>- The site will support the Low Line walking route which will encourage improved physical health, resulting in exercise which encourages good mental health.</li> <li>- The potential provision of D uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the SFRA report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk</p>

				<p>elsewhere, and, where possible, reducing flood risk overall. Basement dwellings will not be permitted on this site. Any development proposals incorporating new or extended basement areas for non residential developments must be accompanied by a Basement Impact Assessment, demonstrating that the development will be safe from a flood risk perspective, and will not have any adverse impacts on local hydrogeology. Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</p> <p>In light of the above, it is concluded the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home		✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The site will support the enhancement of the low-line walking route; improve accessibility to bus stops and the existing cycle network. This will provide more opportunities for more active modes of transport which is good for both physical and mental health and help reduce reliance on cars.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site may provide D1 and D2 uses this could include leisure facilities such as cinemas, and gyms or community facilities like places of worship or health services, these are all important in encouraging community interaction and active, healthy lifestyles.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP 81: 330-344 Walworth Road**

- Redevelopment of the site must:
- Provide retail ,community and leisure uses on the ground floor with active frontages on Walworth Road; and
  - Re-provide affordable retail space; and
  - Provide new homes (C3); and
  - Support the Low Line walking route adjacent to the railway viaduct.

<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs within town centre and community uses during the construction and once the development is completed which will tackle poverty and wealth creation.
<b>IIAO 2</b>	To improve the education and skill of the population	✓✓	✓✓	The provision of new retail, community and leisure uses will allow staff to gain new skills whilst working in these establishments.
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Enhancement of the low-line walking route and access to the Southwark Spine cycle network, will provide more opportunities for active modes of transport which is good for both physical and mental health..
			✓✓	More job opportunities generated by commercial space uplift will help reduce poverty as an underlying determinant.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability and activation of frontages, particularly along the low-line route, will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The potential provision of D uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions.
			✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
			✓✓	The site will improve connectivity for pedestrians through the enhancement of the low line walking route, this will create a more legible urban environment to avoid physical barriers and issues of severance.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	Low-line and planned cycle ways will promote sustainable modes, improving air quality and reducing greenhouse gas emissions.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Sustainable modes of transport such as walking and cycling reduce air emissions which will help contribute to providing improved air quality more active modes of transport and less reliance on cars.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	-	-	New development could place additional pressures on the water network but development comes with the potential for water-recycling and sustainable water measures when development in operation. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.

<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	-	The site is not in close proximity to any open spaces.
			✓	NSP policies require development to avoid harm to the character of the existing townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site lies within the Walworth Road Conservation Area  The site is in proximity to Grade I listed, Church of St Peter, Grade II listed buildings on Sutherland Square and Liverpool Grove, and within the setting of buildings of townscape merit. The site is within the Walworth Heritage Action Zone (HAZ).  The site partially lies within the Borough View of St Paul's Cathedral along Camberwell Road.  The site is not within a borough designated Archaeological Priority Area but an archaeological assessment is required for this large site.  Development will be respectful to the designations of conservation areas, listed buildings, protected views and areas of archaeological significance and designed in a way which seeks to enhance the setting of historical assets where relevant.
			✓	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	-	The site is not in close proximity to any open spaces.
			✓	NSP policies require development to contribute to biodiversity gains through measures 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.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	<p>The sequential test confirms that the site (SFRA Level II, Analysis 21) will have a "more vulnerable" use, mixed use including (residential, town centre, and community) in Flood Zone 3 benefitting from defences. This development therefore requires an additional exception test, which would be satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk.</p> <p>The site development will bring sustainability benefits as follows:</p> <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- Improved frontages and access to the lowline will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Redevelopment will support the low line walking route adjacent to the railway viaduct. Encouraging more active modes of transport will encourage improved physical health</li> <li>- The site will support the Low Line walking route which will encourage improved physical health, resulting in exercise which encourages good mental health.</li> <li>- The potential provision of D uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions.</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the SFRA report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. A site-specific FRA is also required for any development proposals to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall. Basement dwellings will not be permitted on this site. Any</p>

				<p>development proposals incorporating new or extended basement areas for non residential developments must be accompanied by a Basement Impact Assessment, demonstrating that the development will be safe from a flood risk perspective, and will not have any adverse impacts on local hydrogeology. Ground conditions should be confirmed through site investigation and dewatering of excavations and basement waterproofing implemented where required.</p> <p>In light of the above, it is concluded the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The site will support the enhancement of the low-line walking route, improve accessibility to bus stops and the existing cycle network. This will provide more opportunities for more active modes of transport which is good for both physical and mental health and help reduce reliance on p.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site could provide D1 and D2 uses this could include leisure facilities such as cinemas, and gyms or community facilities like places of worship or health services, these are all important in encouraging community interaction and active, healthy lifestyles.
			✓✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

**NSP82: Chatelaine House, Walworth Road**

Site requirements

Redevelopment of the site must:

- Provide retail, community and leisure uses on the ground floor with active frontages on Walworth Road; and
- Provide new homes (C3).

Relevant planning applications:

13/AP/1122

Chatelain House  
182-202 Walworth Road  
London  
SE17 1JJ

Demolition of the existing building and erection of a building ranging in height from 4 storeys to 6 storeys (plus basement) comprising 4,945 sqm (GEA) of use Class A1 (shops), A3 (restaurants and cafes), D2 (Assembly and Leisure) and B1 (Business) floorspace and 54 residential units with associated landscaping, play space, cycle parking and 6 accessible car parking spaces

IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The site will therefore provide opportunities for jobs during the construction and also once the development is completed which will tackle poverty and wealth creation.
			✓✓	Under NSP policies, development of this nature will secure local jobs and opportunities for local businesses to tender for procurement.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The provision of new retail, community and leisure will allow staff to gain new skills whilst working in these establishments.
IIAO 3	To improve the health of the population	✓✓	✓✓	More job opportunities generated by employment space uplift and town centre uses which will help reduce poverty as an underlying determinant.
			✓✓	The scheme provides a total of 72 cycle parking spaces. The provision of cycle storage will help encourage new residents to take more active modes of transport.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved permeability and activation of frontages, particularly along the low-line route, will open up spaces to promote social interaction and the feeling of public safety.
			✓✓	Providing new homes will result in more people in the local area, the increased presence and activity will result in greater natural surveillance within the locality which should reduce incidences and the fear of crime within the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The provision of D uses on site will enable more social interactions which can help to break down barriers to community cohesions.

		ü✓	✓✓	The delivery of more homes, consisting of a mix of different sizes and tenures will bring more people to the area from a range of different backgrounds, this will create more opportunities for greater diversity within the area and encourage more community cohesion
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	Low-line and planned cycle ways will promote sustainable modes of transport, improving air quality and reducing greenhouse gas emissions.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Sustainable modes of transport such as walking and cycling reduce air emissions which will help contribute to providing improved air quality through more active modes of transport and less reliance on private vehicles.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	Substantial demolition and intensification of development will create new waste demands to be managed. NSP policies require adequate management of waste from construction and intensified development in accordance with the waste management hierarchy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	✓	✓	NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	-	-	All site allocations promote the re-use of previously developed sites which may provide opportunities to remediate contaminated land, but soil quality is unlikely to significantly improve due to few largescale opportunities for additional green space due to the density of the vision area.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	-	The site is not in close proximity to any open spaces.
			✓	NSP policies require development to avoid harm to the character of the existing townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The site lies within the Walworth Road Conservation Area  The site is in proximity of Grade II listed civic cluster including, The Walworth Clinic, the former Southwark Town Hall and the Church of St John the Evangelist. The site lies within the Walworth Heritage Action Zone (HAZ).  Tier 2 APA designation. The site is located in APA2 - Walworth Village  The form of the proposed development is respectful of its setting and the prevailing local character. The predominance of brick is an important characteristic and helps to ground the building within its local context. The proposed scheme was considered not to look incongruous in the streetscene and, as such, would not detract from the character or setting of local heritage assets.
			✓	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	-	The site is not in close proximity to any open spaces.
			✓	NSP policies require development to avoid harm to the character of the existing townscape.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The sequential test confirms that the site (SFRA Level II, Analysis 21) will have a "more vulnerable" use, mixed use (residential, town centre, employment, open space and community) in Flood Zone 3 benefitting from defences. Therefore an additional exception test was required. which was satisfied by the first criteria that the development proves to provide wider sustainability benefits to the community that outweigh flood risk.  The site development will bring sustainability benefits as follows: <ul style="list-style-type: none"> <li>- The redevelopment will provide new homes and create job opportunities during construction to tackle poverty</li> <li>- The site will enable skills to be developed by workers who are employed to carry out the construction</li> <li>- New residential provision will address the housing shortage, overcrowding and affordability issues, which are among the key determinants of public health</li> <li>- The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement. A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.</li> </ul>

				<ul style="list-style-type: none"> <li>- Improved frontages and access to the lowline will encourage walkability and cycling, which will bring positive health effects by encouraging active travel modes</li> <li>- Redevelopment will support the low line walking route adjacent to the railway viaduct. More active modes of transport will encourage improved physical health</li> <li>- The site will support the Low Line walking route which will encourage improved physical health, resulting in exercise which encourages good mental health.</li> <li>- D uses on site will encourage cultural uses in the area, giving people more knowledge and understanding of different cultural, beliefs and traditions, which will help to break down barriers to community cohesions.</li> <li>- .The site is required to develop in a sensitive manner to the listed buildings, the open space and heritage assets, and reflect existing building heights, so as to respect the local character, heritage and townscape</li> </ul> <p>To meet the second requirement that the development is safe for its lifetime, recommendations are set out in the SFRA report including site specific emergency evacuation procedures, flood resilient construction techniques and SuDS. The submitted Flood Risk Assessment for the granted scheme 13/AP/1122 identifies the site as being protected by the River Thames Tidal Defences. The report identifies mitigation measures to reduce the risk of flood risk: residential development is proposed at first floor level and above (8.11 metres AOD) approximately 3.1 metres above the 0.5% and 0.1% annual probability River Thames Tidal flood levels, with the less vulnerable commercial units located at ground floor level. The FFL of the commercial ground floor units will be 3.65 metres AOD to reflect surrounding ground floor levels. The Southwark Strategic Flood Risk Assessment notes that if a breach of tidal defences were to occur, there is likely to be a significant lead-in time of over 12 hours. Further, maximum flood depths would be relatively shallow at 100mm, so flood hazard in the area would be low, allowing safe pedestrian access. The River Thames Flood defences defend the site to a 1 in 1000 year annual probability of river flooding in any year. Areas of residual flooding occur where flood defences fail or the flood event is greater than predicted; however, the site is not identified as being located in an area of residual flood risk. On this basis, the Environment Agency raises no objection to the proposed scheme. With regard to surface water run-off, the existing site is predominantly hard standing with limited areas of soft landscaping. Rainwater harvesting and green / brown roofs are to be incorporated into the proposed design, in order to improve the efficiency of water use and attenuate surface water run-off. On-site storage facilities are proposed to be stored on site to restrict surface water run-off, with discharge to the existing public sewer network. Subject to conditions to secure details of surface water run-off, green / brown roofs and rainwater harvesting, the granted scheme is not considered to increase flood risk.</p> <p>In light of the above, it is concluded the exception test is satisfied whereby flood risk to people and property will be managed satisfactorily, when allowing necessary development on this site to occur.</p>
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The increased provision of affordable homes is encouraged through Policy P1 fast track route for planning applications which trigger the affordable housing requirement.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the draft London Plan housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	The scheme provides a total of 72 cycle parking spaces. The provision of cycle storage will help encourage new residents take more active modes of transport and reduce reliance on cars.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The site will provide D2 uses this could include leisure faculties such as cinemas, and gyms or community facilities these are all important in encouraging community interaction and active, healthy lifestyles.
			✓	Any development coming forward will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy which will deliver the required infrastructure to mitigate impact of the development.

## Appendix 6: Assessment of the Strategic and Development Management Policies

The following tables set out the impacts identified through the IIA of the Main Modifications to the New Southwark Plan. This provides a qualitative assessment of the policies against the 17 sustainability objectives encompassing social, environmental and economic aspects. Each objective is assessed on a scoring scale (Key 1), with each grade assigned a numeric value, symbol and colour. Alongside this scoring, a detailed commentary on the policy is provided.

### Key 1: Individual scoring against each objective

Symbol and colour	Scoring Value (%)	Score	Description
✓✓	100	Major or direct positive	The proposed option/policy contributes significantly to the achievement of the objective.
✓	50	Minor or indirect positive	The proposed option/policy contributes to the achievement of the objective but not significantly or indirectly.
-	0	Neutral	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
x	-50	Minor or indirect negative	The proposed option/policy detracts from the achievement of the objective but not significantly.
xx	-100	Major or direct negative	The proposed option/policy detracts significantly from the achievement of the objective.
?	N/A	Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.

At the bottom of the table, there is an averaged scoring of the 17 objectives to indicate each strategic policy's and development management policy's overall efficacy in meeting the sustainability objectives. The colour bar below (key 2) divides the overall scoring into three categories from positive, neutral to negative.

### Key 2: Averaged IIA objectives scoring for each policy

Negative	Neutral	Positive
< 10 %	10 - 49%	50 - 100%

**Integrated impact assessment for**

**Strategic Targets**

Including

SP1a: Southwark’s development targets

SP1b: Southwark’s places

	SP1a	SP1b
IIAO 1	✓✓	✓✓
IIAO 2	✓✓	✓
IIAO 3	✓	✓
IIAO 4	N/A	N/A
IIAO 5	✓✓	✓✓
IIAO 6	?	?
IIAO 7	?	?
IIAO 8	?	?
IIAO 9	?	?
IIAO 10	✓✓	✓✓
IIAO 11	✓	✓
IIAO 12	✓	✓
IIAO 13	✓	✓✓
IIAO 14	X	X

IIAO 15	✓✓	✓✓
IIAO 16	N/A	N/A
IIAO 17	✓	N/A
Avg.	64%	65%

SP1a - Southwark's development targets				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The policy sets out targets for housing, employment, jobs and cultural and community uses. The delivery of these will create more inclusive and active places for all. The strategic targets aim to ensure affordable homes and job opportunities are provided for Southwark residents.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	It sets out the intention to create successful places which includes the development of schools and education places. This is supported by development management policies in the Plan which aim to give residents the best start in life.
IIAO 3	To improve the health of the population	✓	✓✓	The policy recognises the need for developments such as health centres are necessary to create successful places. This is supported by other policies in the Plan such as those under SP4
			?	There is a risk that an increase in housing and new employment developments may increase exposure to poor air quality. The policy recognises the need to use technology and other building infrastructure to improve air quality and tackle the climate emergency. The implementation of this should be considered alongside policy P64 Improving air quality as well as other policies relating to the climate emergency.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The policy sets out targets for affordable housing, employment, jobs and cultural and community uses. The delivery of these will create more inclusive and active places for all.
IIAO 6	To reduce contributions to climate change	?	?	There is a risk that an increase in housing or employment floorspace may increase CO <sup>2</sup> emissions. However, this is required to be offset through the

				Energy policy (P69) and Sustainability standards (P68).
			?	There is a risk that an increase in housing or employment floorspace will increase energy consumption. However, this is required to be offset through the Energy policy (P69) and Sustainability standards (P68).
IIAO 7	To improve the air quality	?	?	There is a risk that an increase in housing/employment floorspace will make improving air quality more difficult, due to an overall increase in emissions from increased population and the requirement to heat and power their homes.
			?	There is a risk that an increase in housing or jobs could increase the number of car trips.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	A net increase in new homes and jobs will result in a net increase in the demand for water and foul sewage disposal.
IIAO 9	To encourage sustainable use of water resources	?	?	There is a risk that increase of population through new housing will lead to increase use of water, which could have a negative impact on quality and sustainable resourcing of water, unless appropriately partnered with Thames Water to manage an increase in demand. Establishing secure water resource partnerships will ensure that continued water standards are kept high and in line with national policy and ensure that everyone has access to potable water.
IIAO 10	To maintain and enhance the quality of land and soils	✓✓	✓✓	Infill development and wholesale redevelopment will result in a higher density and a more efficient use of land.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	It recognises the need to protect and enhance our places and identifies a need for increased retail floorspaces to ensure vibrant and diverse town centres. This will be achieved through policies under SP4
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The policy identifies the intention to preserve and enhance the history of places which is supported by the policies under SP2.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	Protected open space and previously non-developed land will not be developed for housing. The policy recognises the need to preserve and enhance open spaces.
			✓	Infill development and wholesale redevelopment may risk some non-protected open spaces being lost; however, this will be reprovided in different ways as part of new housing or employment developments.
IIAO 14	To reduce vulnerability to flooding	x	x	The Thames flood risk zones and critical drainage areas cover the majority of the borough; therefore any development in Southwark will most likely be

				in an area at risk of flooding.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Its key objective is to increase the supply of housing, particularly council homes.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	✓	The policy recognises the need for activities such as leisure and sports, sport, health, tourism and education are necessary to create successful places and for supporting the fast pace of change in opportunity areas but does not identify strategic targets to set out how this should be achieved.

<b>SP1b - Southwark's places</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	It outlines the expected capacity for each type of development in each are of the borough to ensure a successful spatial strategy and recognises that most development will happen in opportunity areas.
<b>IIAO 2</b>	To improve the education and skill of the population	✓	✓	The policy does not identify the capacity for school places in each area, however, these will be delivered through site allocations in conjunction with policies under SP3 and SP4.
<b>IIAO 3</b>	To improve the health of the population	✓	✓✓	The policy does not identify the capacity for health facilities in each area, however, it does set out the capacities for new homes. Good quality social rented and intermediate homes can contribute towards improving mental health, in turn reducing the risk of social exclusion.
			x	There is a risk that an increase in housing and employment developments may increase exposure to poor air quality. However this effect of the implementation of this policy should be considered in conjunction with policy P64 'Improving air quality.'
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	N/A	N/A	
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	It outlines the need to involve a diverse range of people and the need to work with stakeholders such as the local community to ensure the successful regeneration of places.
			✓✓	The policy recognises the need for a spatial strategy to deliver a cohesive and vibrant borough

IIAO 6	To reduce contributions to climate change	?	?	There is a risk that an increase in housing and employment developments may increase CO <sub>2</sub> emissions. However, this is required to be offset through the Energy policy (P69) and Sustainability standards (P68).
			?	There is a risk that an increase in housing will increase energy consumption. However, this is required to be offset through the Energy policy (P69) and Sustainability standards (P68).
IIAO 7	To improve the air quality	?	?	There is a risk that an increase in housing will make improving air quality more difficult, due to an overall increase in emissions from increased population and the requirement to heat and power their homes.
			?	There is a risk that an increase in housing and jobs could increase the number of car trips.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	A net increase in new homes and jobs will result in a net increase in the demand for water and foul sewage disposal.
IIAO 9	To encourage sustainable use of water resources	?	?	There is a risk that increase of population through new housing will lead to increase use of water, which could have a negative impact on quality and sustainable resourcing of water, unless appropriately partnered with Thames Water to manage an increase in demand. Establishing secure water resource partnerships will ensure that continued water standards are kept high and in line with national policy and ensure that everyone has access to potable water.
IIAO 10	To maintain and enhance the quality of land and soils	✓✓	✓✓	The policy recognises the need to protect open spaces and sets out indicative capacities for the increase of open space in each area of the borough.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	It recognises the need to protect and enhance our places and identifies increased town centre uses in each area of the borough to ensure vibrant and diverse town centres. This will be achieved through policies under SP4
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	The policy identifies the intention to preserve and enhance the history of places which is supported by the policies under SP2.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	The policy recognises the need to protect open spaces and also to increase the quantity of open space in the borough. Protected open space and previously non-developed land will not be developed on
IIAO 14	To reduce vulnerability to flooding	x	x	The Thames flood risk zones and critical drainage areas cover the majority of the borough; therefore any development in Southwark will most likely be in an area at risk of flooding.

<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Its key objective is to increase the supply of housing. The policy sets out the capacity for housing in each area. Other policies in the plan seek to improve the quality of housing through setting standards of homes being developed.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

## Strategic Policy 1: Homes for all

Including

- P1: Social Rented and intermediate housing
- P2: New family homes
- P3: Protection of existing homes
- P4: Private rented homes
- P5: Student Homes
- P5a: Purpose built shared living
- P6: Housing for older people
- P7: Wheelchair accessible and adaptable housing
- P8: House in multiple occupation
- P9: Supported housing and hostels
- P10: Self and custom build
- P11: Homes for Travellers and Gypsies

	SP1	P1	P2	P3	P4	P5	P5a	P6	P7	P8	P9	P10	P11
IIAO 1	✓✓	✓✓	✓✓	N/A	✓	✓	✓✓	✓✓	N/A	N/A	N/A	N/A	✓✓
IIAO 2	✓✓	✓✓	✓✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓
IIAO 3	✓	✓	✓	✓	✓	✓✓	✓✓	✓✓	✓✓	N/A	N/A	N/A	✓
IIAO 4	N/A	✓✓	✓✓	✓✓	✓	N/A	N/A	N/A	✓✓	?	?	N/A	✓✓
IIAO 5	✓✓	✓	N/A	✓✓	✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓	✓
IIAO 6	?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓	N/A
IIAO 7	?	N/A	?	?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 8	?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓✓
IIAO 9	?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓	✓✓
IIAO 10	✓✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓✓	N/A
IIAO 11	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 12	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 13	✓	✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓	✓
IIAO 14	x	x	x	N/A	x	N/A	N/A	x	x	x	x	x	x
IIAO 15	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	N/A	✓	✓✓
IIAO 16	✓	N/A	N/A	N/A	N/A	?	N/A	✓	✓	N/A	N/A	N/A	N/A
IIAO 17	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓✓
Avg.	70%	63%	67%	88%	33%	100%	100%	67%	67%	75%	50%	42%	68%

SP1 – Homes for all				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	It outlines how housing will be of a high standard and of a good quality. One of the markers of poverty is poor housing conditions which SP1 will help to address.
			?	There is a risk that some employment floorspace will be lost through the development of housing, however this will need to be justified with evidence and we will be promoting the development of employment floorspace through other policies in the New Southwark Plan.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Good quality affordable homes can be a basis from which to live a healthy life.
IIAO 3	To improve the health of the population	✓	✓✓	Good quality affordable homes can improve mental health, in turn reducing the risk of social exclusion.
			x	There is a risk that an increase in housing may increase exposure to poor air quality. However this effect of the implementation of this policy should be considered in conjunction with policy P64 'Improving air quality.' The policy also now requires homes to be built with sustainable design to ensure the reduction of carbon emissions.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	It outlines how housing types for a diverse range of needs, including family households, childless households, elderly housing, disabled housing, housing on small sites and housing for vulnerable people.
			?	It specifies that infill development may occur, which could potentially be on (non-formally designated) open space on existing housing land.
			✓✓	Housing provided for older people and those with mobility issues will be provided to needs for a wide range of protected characteristics.
IIAO 6	To reduce contributions to climate change	?	?	There is a risk that an increase in housing may increase CO <sup>2</sup> emissions. However, this is required to be offset through the Energy policy (P69) and Sustainability standards (P68). The policy now requires homes to be built with sustainable design to ensure the reduction of carbon emissions which is essential to adapting to climate change.
			?	There is a risk that an increase in housing will increase energy consumption. However, this is required to be offset through the Energy policy (P69) and

				Sustainability standards (P68). The policy also now requires homes to be built with sustainable design which should reduce energy consumption.
IIAO 7	To improve the air quality	?	?	There is a risk that an increase in housing will make improving air quality more difficult, due to an overall increase in emissions from increased population and the requirement to heat and power their homes.
			?	There is a risk that an increase in housing could increase the number of car trips.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	A net increase in new homes will result in a net increase in the demand for water and foul sewage disposal.
IIAO 9	To encourage sustainable use of water resources	?	?	There is a risk that increase of population through new housing will lead to increase use of water, which could have a negative impact on quality and sustainable resourcing of water, unless appropriately partnered with Thames Water to manage an increase in demand. Establishing secure water resource partnerships will ensure that continued water standards are kept high and in line with national policy and ensure that everyone has access to potable water.
IIAO 10	To maintain and enhance the quality of land and soils	✓✓	✓✓	Infill development, development on small sites and wholesale redevelopment will result in a higher density and a more efficient use of land.
IIAO 11	To protect and enhance quality of landscape and townscape	N/A	N/A	
IIAO 12	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	Protected open space and previously non-developed land will not be developed for housing.
			✓	Infill development and wholesale redevelopment may risk some non-protected open spaces being lost, however this will be reprovided in different ways as part of new housing.
			✓	Infill development and wholesale redevelopment may risk some non-protected open spaces being lost, however this will be reprovided in different ways as part of new housing. New housing will be better sited and linked to the surrounding areas including to green spaces.
IIAO 14	To reduce vulnerability to flooding	x	x	The Thames flood risk zones and critical drainage areas cover the majority of the borough; therefore any housing development in Southwark will most

				likely be in an area at risk of flooding.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Its key objective is to improve the supply of housing, particularly quality, affordable housing and maintain high housing standards.
			✓✓	It outlines how we will deliver a range of housing types to meet a diverse need.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	ü	✓	It outlines how a range of housing types will be delivered, including housing for older people and others who may have mobility issues.
IIAO 17	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P1 – Social rented and intermediate homes				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	It outlines that any affordable housing delivery must be a net increase and that developments must provide the maximum viable amount of social and intermediate housing. Housing conditions, including affordability relative to income, is an indicator of poverty which P1 will help to address. The introduction of a fast track route should incentivise developers to provide a high percentage of affordable housing.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	It outlines how children in overcrowded households do worse in school. Overcrowded households occur as a result of a lack of affordable housing. P1 will help to address this. Statistically overcrowded households are most likely to be composed of people from black or ethnic minority households. Therefore P1 will help to address this specific need.
IIAO 3	To improve the health of the population	✓	✓✓	It outlines how people in overcrowded households can suffer from sleep deprivation, which can have serious health consequences. P1 will help to address this.
			✓✓	The delivery of more affordable homes benefits everyone by ensuring enough supply of affordable homes will mean less pressure on market homes, and so result in an overall reduction in housing pressure, meaning all will benefit from an improved housing quality (in which housing costs are an indicator of quality).

			✓✓	It outlines the negative health effects of overcrowded and unaffordable housing. P1 will help to address this.
			✓	Estate regeneration of older, poor quality stock also seeks to improve the quality of homes through replacing these properties with new, high quality homes. This results in residents, including some with protected characteristics being moved out of their home. However, in the long term this is required to ensure residents can live in high quality housing in the borough which will improve peoples' health if they have a high quality, safe home to go to.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The delivery of more affordable homes in the tenure blind design will be a crucial part of mixed and balanced communities, which will have positive impacts on the perception of crime as compared to the segregation of different housing types and socio-economic groups otherwise.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓	✓✓	More affordable housing will enable people from different backgrounds and on different incomes, and by extension, those who live different lifestyles and who are from different communities, to live alongside each other.
			✓	Throughout the plan policies require high quality homes and sets out criteria for housing developments. Proposals for housing developments will be encouraged to meet these. The policies also require the design of market and affordable homes to be 'tenure blind' to ensure diverse and mixed communities are delivered
			x	The housing policies require the delivery of affordable housing for sites designated for housing, where residents have to leave their homes, e.g. Aylesbury, the council will seek to re-house residents nearby. They will also encourage the right to return for residents so local people can stay in the borough. This will ensure communities can stay together and stay where they call home. This also seeks to ensure protected characteristics are considered and looked after where they are impacted by estate regeneration.
<b>IIAO 6</b>	To reduce contributions to climate change	N/A	N/A	
<b>IIAO 7</b>	To improve the air quality	N/A	N/A	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use	N/A	N/A	

	of water resources			
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	It outlines how affordable housing must be delivered onsite. The majority of land in the borough is previously developed land; therefore P1 indirectly encourages development on previously developed land.
<b>IIAO 14</b>	To reduce vulnerability to flooding	x	x	The majority of land in the borough is at risk of some form of flooding, therefore there is a high probability that any affordable housing delivery will be in an area of flooding.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It outlines the requirement for a net increase in affordable housing as a percentage of any residential development that comes forward over the life of the plan.
			✓✓	It will help increase the amount of affordable tenure homes and the affordability of homes to address the needs of local people.
			✓✓	The policy encourages the delivery of homes to increase housing supply within the borough. In the long-term, through the provision of more homes, including affordable homes, increased supply should improve the affordability of homes. The provision of affordable homes is encouraged through the introduction of the fast track route for affordable housing in P1.
			✓✓	A lot of economic factors can impact upon housing price, which is an indicator of housing affordability. However, supply of more homes across London (in line with the London Plan 2021 housing target) in the long term will encourage the improved affordability of homes in the borough.
			✓✓	By identifying development capacity for residential development housing delivery is supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
			✓✓	Through the increased delivery of housing and affordable housing, this should improve health of people in the borough if they have a permanent home and families can stay together.

<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P2 – New family homes				
IIA Objectives	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	It outlines how building more family sized homes will address overcrowding. Housing conditions are one of the indicators of poverty, including overcrowding. The inclusion of the different standards for Aylesbury Action Area Core ensures that the need in this area is addressed and larger homes are provided.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Overcrowding in family households can result in children doing worse at school than their non-overcrowded peers. Our most deprived neighbourhoods have a higher concentration of residents from a Black or Ethnic Minority (BME) background. One of the indicators of deprivation is housing conditions, including overcrowding. From this, these groups have most to gain from the delivery of family sized housing, and should help to reduce overcrowding and so educational disparity between ethnic groups.
IIAO 3	To improve the health of the population	✓	✓✓	Overcrowding in family homes can negatively impact health, including sleep deprivation. Building more family sized homes will help address overcrowding and help facilitate healthy living.
			✓✓	More family housing will reduce the demand for other types of housing (that are not appropriate and/or not designed for families) from families who can't currently find or afford purpose-family housing, indirectly increasing the likelihood of everyone's housing need being met.
			✓	It outlines how it will reduce over crowding. Overcrowding is a central aspect of housing conditions, which are an indicator of poverty. P2 will help to address this.
			✓✓	Overcrowding can significantly impact physical and mental health. Addressing this through the provision of family homes will help improve health and reduce social exclusion.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Providing family homes for families will mean communities will be composed of a range of people of different ages, including children. This will make for a stronger, more diverse community where everyone's need is catered for.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	N/A	N/A	

<b>IIAO 6</b>	To reduce contributions to climate change	N/A	N/A	
<b>IIAO 7</b>	To improve the air quality	?	?	Cars are typically favoured by families more so than single people because of the convenience they offer. There is a risk that an increase in family sized homes may increase the demand for car journeys. However, it is not certain that this demand will materialise into an increase in the amount and length of journeys made by car.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	x	x	The majority of land in Southwark is at risk from some form of flooding, meaning that new homes, including new family sized homes will most likely be in areas at risk of flooding.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	More family homes will reduce the likelihood of overcrowding as families have an increased chance of finding suitable accommodation with enough space. The inclusion of the different standards for Aylesbury ensures that the need in this area is addressed and ensures that the residents in Aylesbury will have an opportunity to live in a suitable home.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support	N/A	N/A	

	existing and future development			
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P3 – Protection of existing homes				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓	✓	Overcrowding in family homes can negatively impact health, including sleep deprivation. Protecting existing family sized homes will help address minimise overcrowding and help facilitate healthy living.
			✓	Protecting existing family housing will reduce the demand for other types of housing, indirectly increasing the likelihood of everyone's housing need being met.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Protecting our existing family homes will ensure our communities retain a strong mix in terms of housing choice and cater for a range of housing needs.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	It will increase the opportunity for families to be a component of diverse communities.
			✓✓	It outlines how existing family sized homes will be prevented from conversion into smaller homes that would be unsuitable for families. This will positively impact children more than other groups.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	?	?	Cars are typically favoured by families more so than single people because of the convenience they offer. There is a risk that the protection of family sized homes may not reduce the demand for car journeys. However, it is not certain that this demand will materialise into an increase in the amount and length of journeys made by car.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use	N/A	N/A	

	of water resources			
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Protecting existing family homes will mean a larger chance of addressing overcrowding problems
			✓✓	An increase in PRS homes will reduce the demand for other types of housing elsewhere.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P4 – Private rented homes				
I/A Objective	Description	Averaged grading	Sub grading	Commentary
I/AO 1	To tackle poverty and encourage wealth creation	✓	✓	One of the indicators of poverty is housing conditions, which can include housing costs and security. The provision of private rented sector (PRS) homes, with secure, longer term tenancies will help address this aspect of poverty, freeing up and reducing the cost of homes of other types for other people, including those affected by deprivation and poverty.
I/AO 2	To improve the education and skill of the population	N/A	N/A	
I/AO 3	To improve the health of the population	✓	✓	Secure rented housing with a longer term tenancy can reduce the stress and pressure of housing issues, including rent rises at the end of a shorter tenancy agreement and the subsequent relocation where necessary. Reduced stress from the provision of PRS housing will help to improve tenant's mental health and social exclusion.
			✓	The provision of PRS housing will help to reduce the demand for other types of housing, in turn contributing to reduced housing costs, benefitting everyone's quality of housing.
			✓✓	Policy P4 will in particular support people with protected characteristics and require these houses to be of the same standard as build-for-sale homes and tenants can have more comfort that they can remain in their home for the length of the long-term tenancy. That will in turn improve the mental health and well being of the residents.
I/AO 4	To reduce the incidence of crime and the fear of crime	✓	✓	Secure, longer term tenancies offered through PRS housing developments will enable people to plan for the years ahead without having to worry about the termination of their rental contract or a rent increase. This will help to create a more cohesive community where people will understand that they can be safe in the knowledge they can belong to the community for a longer period of time than they would if they were renting through a standard assured short hold tenancy agreement (typically 6-12months).
I/AO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	PRS housing will help provide security as well as economic mobility, where they can have the option of moving away for work or other reasons. This will help a section of society that makes up a part of a diverse community.
			✓	PRS housing will most likely positively affect younger adults more than other

				groups as these make up the majority of existing renters and are most likely to want to have the option of moving away for work or other reasons, while still having secure housing in their current location.
<b>IIAO 6</b>	To reduce contributions to climate change	N/A	N/A	
<b>IIAO 7</b>	To improve the air quality	N/A	N/A	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	x	x	The majority of land in Southwark is at risk from some form of flooding, meaning that new homes, including new homes delivered on PRS schemes, will most likely be in areas at risk of flooding.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓	✓✓	As home ownership is an issue in London due to affordability, Policy P4 which considers private rented homes, seeks to provide more security for people who want to rent a property, through requiring long-term tenancies. Policy P4 amendment removes the higher bracket of affordable housing in private rented homes, which ensures more affordable private rented homes are delivered for people more in need.
			✓	Policy P4 also requires private rented homes delivered to be of the same standard as build-for-sale homes, this will ensure these are of equal design standards and if residents cannot afford to buy a property they are able to live in a high quality home.

<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

<b>P5 – Student homes</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓	✓✓	It seeks to secure a significant amount of both conventional affordable housing and affordable student housing which will provide the opportunity to reduce poverty and encourage wealth by enabling those with less financial means to secure affordable housing and/or part take in further and higher education.
			✓	Students comprise of an important part of the local community and provision of specialist housing means that their particular needs will be met in neighbourhoods that are 'successful for all.'
<b>IIAO 2</b>	To improve the education and skill of the population	N/A		
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Providing specialist student housing will mean that students will be able to live together, i.e. those in the same situation and potentially at the same stage of life. This will reduce social isolation and have the potential to significantly reduce the chance of resultant mental health issues.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	N/A	N/A	
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓	✓✓	It will primarily benefit young people who typically take residency in purpose built student housing schemes. However, provision of student housing will mean less students putting demand on conventional housing, meaning, all other things being equal, access to and affordability of conventional housing is more likely to remain stable as a result of this. This will help community cohesion as less housing problems are experienced by the community.
			✓	The provision of student housing will mean students will be able to live

				together, i.e. individuals in similar situations, likely in the same stage, but from different walks, of life who will be able to relate to and learn from each other. This will help to significantly reduce the likelihood of social isolation among the student body.
<b>IIAO 6</b>	To reduce contributions to climate change	N/A	N/A	
<b>IIAO 7</b>	To improve the air quality	N/A	N/A	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It seeks to ensure provision of two large segments of housing need is fulfilled: student housing (including affordable student housing) and conventional affordable housing. Provision of these three types of housing will have a knock on effect for access to and affordability of other types of housing, the demand for which may be pushed up by those that would be served by purpose-built student housing (including affordable student housing) and standard affordable housing. By this knock-on effect, it can be agreed the policy seeks to improve the supply of housing for all.
			✓✓	It will contribute towards increasing the range of housing mix, tenure, affordability to meet the current and future identified need in the borough.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	?	?	It does not specify locations where student housing should be delivered, which implies that it may be possible for it to be delivered in areas of poor public transport accessibility levels and/or areas that are not within walking and/or cycling distance of educational institutions. However, due

				to the majority of students do not have cars in London so this policy is not considered likely to increase the demand for travel by private car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P5a – Purpose built shared living				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	It seeks to secure a significant amount of affordable conventional housing and which will provide the opportunity to reduce poverty and encourage wealth by enabling those with less financial means to secure affordable housing.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Providing shared living accommodation will mean that people will be able to live together. This will reduce social isolation and have the potential to significantly reduce the chance of resultant mental health issues.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓✓	It will primarily benefit young people who typically take residency in shared living schemes housing schemes. However, provision of this type of housing will mean less people putting demand on conventional housing, meaning, all other things being equal, access to and affordability of conventional housing is more likely to remain stable as a result of this. This will help community cohesion as less housing problems are experienced by the community.
			✓	The provision of shared living schemes allow people to live together, i.e. individuals in similar situations, likely from different walks of life who will be able to relate to and learn from each other. This will help to significantly reduce the likelihood of social isolation among the student body.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	

<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will contribute towards increasing the range of housing mix, tenure, affordability to meet the current and future identified need in the borough.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

<b>P6 – Housing for older people</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	One of the indicators of poverty is housing conditions. Elderly residents are particularly vulnerable to poor housing conditions, where sometimes a lack of a support network can inhibit the identification and addressing of housing problems, including the need for urgent repairs, fuel poverty (where people cannot afford their bills) or access to and around the house. P5 will help to address this.
<b>IIAO 2</b>	To improve the education and skill of the population	N/A	N/A	
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Specialist housing designed for older people will help them lead the lifestyles they want to lead, uninhibited by housing issues.
			✓✓	Specialist housing designed for older people will help address aspects of poverty related to housing conditions including affordability, access and fuel poverty.
			✓✓	Some types of specialist older peoples housing can include facilities such as communal spaces for eating and socialising and washing facilities.
			✓✓	Providing more elderly people housing will help to free up other housing stock currently occupied by the elderly, freeing up non-specialist homes for other

				people.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	N/A	N/A	
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	It will help to support older people as an important part of the community, whose housing needs are well catered for, contributing to making them a constituent part of the wider, diverse community.
			✓✓	The provision of specialist elderly housing will be designed to take account of the accessibility issues that affect the elderly.
			✓✓	It will specifically cater for older people's needs.
<b>IIAO 6</b>	To reduce contributions to climate change	N/A	N/A	
<b>IIAO 7</b>	To improve the air quality	N/A	N/A	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	x	x	The majority of the land within Southwark is at risk from some form of flooding. However, elderly people are considered vulnerable users of a site and so will need to demonstrate that alternative sites of lower flood risk have been considered and, where available, chosen as the location of the development to minimise risk.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Housing designed specifically for older people will free up other types of homes currently occupied by older people, helping increase the availability of non-specialist housing for other people.

<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	It will help older people, who can be prone to mobility issues, to access buildings and places.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

<b>P7 – Wheelchair accessible and adaptable housing</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	N/A	N/A	
<b>IIAO 2</b>	To improve the education and skill of the population	N/A	N/A	
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	The provision of specialist wheelchair housing will enable people with mobility issues to live their life uninhibited by housing issues that may result from living in conventional accommodation. The reasons of the policy sets out that wheelchair housing will be secured through planning conditions to ensure the units are delivered.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Providing homes for people with mobility issues will mean that an under-represented section of society's housing need is catered for. Catering for this need will help build a stronger and more cohesive community in which everyone can feel they belong.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	It will specifically support the lifestyles of people with mobility issues, helping to contribute to diverse communities in which everyone's needs are catered for.
			✓✓	It will try to provide adequate housing for people with mobility issues, and so are the largest minority group to be positively effected by the policy.
<b>IIAO 6</b>	To reduce contributions to climate change	N/A	N/A	
<b>IIAO 7</b>	To improve the air quality	N/A	N/A	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	

<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	x	x	The majority of the land within Southwark is at risk from some form of flooding. However, elderly people are considered vulnerable users of a site and so will need to demonstrate that alternative sites of lower flood risk have been considered.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Housing designed specifically for wheelchair users and others with specialist housing needs will free up other types of homes currently occupied and unsuitable for wheelchair users, helping increase the availability of non-specialist housing for other people. The reasons of the policy sets out that wheelchair housing will be secured through planning conditions to ensure the units are delivered.
			✓✓	Unoccupied specialist wheelchair housing will be used as temporary local authority accommodation and financial contributions paid to the council in place of on-site affordable wheelchair housing provision will help to pay for the conversion of existing social rented homes to be wheelchair accessible or otherwise suitable as specialist housing.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	It will help people with mobility issues, who can be prone to mobility issues, to access buildings and places
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P8 – House in multiple occupation				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	N/A	N/A	
IIAO 4	To reduce the incidence of crime and the fear of crime	?	?	Due to the temporary nature of the tenants there is a risk that the granting of planning permission for H.M.Os could weaken community cohesion. However, this policy requires adequate standards be met to ensure this risk is minimised. The policy sets out a set of criteria for which overconcentration of HMOs will be assessed to ensure that the overconcentration of HMOs does not negatively impact the amenity of the local area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	This policy encourages the provision of affordable housing contributions in accordance with P1. It also supports the housing for people who cannot afford to access, or do not wish to access, self-contained accommodation. This supports residents who require temporary accommodation for different reasons and permits dwelling for use by three to six residents in HMO's.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	N/A	N/A	
IIAO 12	To conserve and enhance the historic environment and cultural assets	N/A	N/A	

<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	x	x	The majority of the land within Southwark is at risk from some form of flooding, meaning the likelihood of HMOs being located in these areas is high.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	This policy requires adequate indoor communal space, outdoor communal amenity space, rubbish storage, cycle parking and standards for HMO's. It therefore improves the residential design quality for people in this accommodation.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P9 – Supported housing and hostels				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	N/A	N/A	
IIAO 4	To reduce the incidence of crime and the fear of crime	?	?	Due to the temporary nature of the tenants and the related reasons that tenants are often referred hostels, there is a risk that the granting of planning permission for them could create tension rather than community cohesion. However, there is no direct correlation with fear of crime and supported housing and hostels. Instead this type of housing helps people in certain life-circumstances, therefore most often helping overall welfare of members within the community. The policy sets out a set of criteria for which overconcentration of hostels will be assessed to ensure that the overconcentration of hostels does not negatively impact the amenity of the local area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Hostels and supported housing are normally administered by the voluntary and community sectors. Granting planning permission for these types of homes will help them achieve their aims of housing and helping.
			✓✓	Hostels and HMOs will house and help people with issues that inhibit them from leading healthy lifestyles, meaning they can start to lead healthy lifestyles and become another section of the diverse community in Southwark.
			✓✓	The provision of accommodation offered by supported housing and hostels will enable the administrators and organisations that run and manage them to engage with the vulnerable groups who are in need. This can be considered a form of community facility provision.
			✓✓	Hostels and HMOs often take in people who have certain issues and are referred to them by the authorities. This includes vulnerable people who may suffer from drug and alcohol addiction, domestic abuse, antisocial behaviour or asylum seekers. Hostels and HMOs will help meet the need for the housing of these vulnerable groups
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	

<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	x	x	The majority of the land within Southwark is at risk from some form of flooding, meaning the likelihood of supported housing and hostels being located in these areas are high.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

<b>P10 – Self and custom build</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	N/A	N/A	
<b>IIAO 2</b>	To improve the education and	N/A	N/A	

	skill of the population			
<b>IIAO 3</b>	To improve the health of the population	N/A	N/A	
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	N/A	N/A	
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓	✓	Self and custom build presents the opportunity for community groups to come together to develop their own homes.
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	The policy supports the provision of self and custom build homes which makes efficient use of land. This infers both developing at an appropriate density and exploring opportunities to improve land which is underutilised or in disrepair.
<b>IIAO 7</b>	To improve the air quality	N/A	N/A	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	✓	✓	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓✓	✓✓	The policy recognises the pressures upon the supply of urban land and stresses the importance of plots making an efficient use of land.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The policy supports the provision of self and custom build homes which makes efficient use of land. This infers both developing at an appropriate density and exploring opportunities to improve land which is underutilised or in disrepair.
<b>IIAO 14</b>	To reduce vulnerability to flooding	x	x	The Thames flood risk zones and critical drainage areas cover the majority of the borough; therefore any housing development in Southwark will most likely be in an area at risk of flooding.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓	✓	The policy supports self-build homes from people or groups on Southwark's Self and Custom Build Register which will make a contribution towards Southwark's housing need.
<b>IIAO 16</b>	To promote sustainable transport and minimise the	N/A	N/A	

	need to travel by car			
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

<b>P11 – Homes for Travellers and Gypsies</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	<p>P11 safeguards the borough's four existing Gypsy and Traveller sites as shown on the Policies Map.</p> <p>The Policy also sets out criteria for the identification of new sites to ensure safe and high quality accommodation.</p> <p>The 42 authorised Gypsy and Travellers' pitches allow existing sites to remain homes for Gypsies and Travellers protecting their welfare to allow business and community to flourish.</p>
<b>IIAO 2</b>	To improve the education and skill of the population	✓	✓	Protecting Gypsy and Traveller pitches ensures that educational infrastructure access is supported and continuous for this group of people and responsive to their lifestyle.
<b>IIAO 3</b>	To improve the health of the population	✓	✓✓	Health infrastructure will be accessible to the safeguarded pitches supporting the improvement of health for this group of people.
			?	It is recognised that it may not be possible to accommodate all those who are seeking culturally appropriate accommodation on sites in the borough and this may lead to feelings of social isolation and potentially have an adverse effect on mental health. The council will work with Mayor of London on the London-wide assessment to work towards accommodating the needs of the community where possible.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Identifying new sites for additional accommodation to meet the needs of Travellers and Gypsies are encouraged by policy to meet the requirements of safe access to the road network.
<b>IIAO 5</b>	To promote social inclusion,	✓	✓✓	Under the Equality Act 2010, outside of the PPTS planning definition, we

	equality, diversity and community cohesion			<p>recognise Gypsy and Travellers as an ethnicity.</p> <p>The policy recognises that there is a demand for 43 pitches for those who do not meet the PPTS definition but who seek culturally appropriate accommodation, with 27 of these pitches needed in the first 5 years. The policy sets out the intention to meet the needs for culturally appropriate accommodation wherever possible and where this is not possible homes will be provided for through other housing policies.</p>
			✓	<p>It is recognised that it may not be possible to provide pitches for all those who seek culturally appropriate accommodation but the council will work with the Mayor on the London-wide assessment of gypsy and traveller accommodation to work towards meeting the need of the community in London.</p>
<b>IIAO 6</b>	To reduce contributions to climate change	N/A	N/A	
<b>IIAO 7</b>	To improve the air quality	N/A	N/A	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	<p>The availability of essential services such as water, sewerage drainage and waste disposal to these sites ensures that the council is able to have oversight of consumption patterns and ensure that sufficient provisions are being made to service the populations living in these locations.</p>
<b>IIAO 9</b>	To encourage sustainable use of water resources	✓✓	✓✓	<p>The availability of essential services such as water, sewerage drainage and waste disposal to these sites ensures that the council is able to have oversight of consumption patterns and ensure that sufficient provisions are being made.</p>
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	<p>By providing designated and serviced Gypsy and Travellers' pitches across the borough ensures that this type of accommodation does not occur in other protected land such as open spaces or green corridors, which could negatively impact biodiversity. Unauthorised encampments will be monitored through the NSP Monitoring Framework to ensure the continued assessment of any unauthorised sites that may impact open</p>

				spaces.
<b>IIAO 14</b>	To reduce vulnerability to flooding	x	x	The Thames flood risk zones and critical drainage areas cover the majority of the borough; therefore any potential addition of sites in Southwark will most likely be in an area at risk of flooding.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	P11 safeguards the borough's four existing Gypsy and Traveller sites, as well as setting out criteria for the identification of new sites to meet any identified need for additional Gypsy and Traveller accommodation and ensure safe and high quality accommodation is provided.
				The policy sets out that where it is not possible to accommodate those seeking culturally appropriate accommodation and do not meet the PPTS definition, people will be housed through other housing policies in the Plan.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	By accounting for these 42 authorised Gypsies and Travellers' pitches sufficient planning provisions can be made to ensure that they are adequately supported through existing use and future development.

## **Integrated impact assessment for**

### **Strategic Policy 2 Southwark Together**

Including

- P12: Design of places
- P13: Design quality
- P14: Residential design
- P15: Designing out crime
- P16: Tall buildings
- P17: Efficient use of land
- P18: Listed buildings and structures
- P19: Conservation areas
- P20: Conservation of the historic environment and natural heritage
- P21: Borough views
- P22: Archaeology
- P23: World Heritage Sites
- P24: River Thames
- P25: Local List

	SP2	P12	P13	P14	P15	P16	P17	P18	P19	P20	P21	P22	P23	P24	P25
IIAO 1	✓✓	✓	N/A	N/A	✓✓	✓	✓	✓	N/A	N/A	N/A	✓	✓	✓	N/A
IIAO 2	✓	N/A	✓	N/A	N/A	N/A									
IIAO 3	✓	✓	✓	✓	✓✓	✓	✓	N/A	N/A	✓	N/A	N/A	N/A	✓	N/A
IIAO 4	✓✓	✓	N/A	N/A	✓✓	✓	✓	N/A	N/A	N/A	N/A	✓	N/A	N/A	N/A
IIAO 5	✓	✓	✓✓	✓	✓✓	✓	✓✓	N/A	N/A	✓	N/A	✓	N/A	✓	✓
IIAO 6	✓	✓✓	✓	✓	✓✓	✓✓	✓✓	?	N/A	✓	N/A	x	?	✓	N/A
IIAO 7	✓✓	✓	✓	✓	✓	✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓	N/A
IIAO 8	✓	N/A	✓	N/A	N/A	N/A	✓	?	✓	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 9	✓	✓	✓	N/A	N/A	N/A	N/A	x	N/A	N/A	N/A	N/A	N/A	✓	N/A
IIAO 10	✓	✓✓	N/A	N/A	N/A	N/A	✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 11	✓	✓✓	✓✓	N/A	✓	✓✓	✓	✓✓	✓✓	N/A	✓✓	N/A	✓✓	✓✓	✓
IIAO 12	✓	✓	✓✓	N/A	✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓
IIAO 13	✓	✓✓	✓	✓	N/A	N/A	✓	N/A	N/A	N/A	N/A	N/A	N/A	✓	N/A
IIAO 14	✓✓	✓✓	✓✓	✓	N/A	N/A	N/A	x	N/A	N/A	N/A	N/A	N/A	✓✓	N/A
IIAO 15	✓✓	N/A	✓	✓✓	N/A	N/A	N/A	✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 16	✓	✓✓	✓	N/A	✓✓	✓	N/A	✓	N/A	N/A	N/A	N/A	N/A	✓	N/A
IIAO 17	✓	✓✓	✓	N/A	N/A	✓✓	✓✓	✓	N/A	N/A	N/A	N/A	N/A	✓✓	N/A
Avg.	65%	75%	65%	57%	83%	70%	64%	38%	83%	63%	100%	42%	93%	67%	50%

SP2 – Regeneration that works for all				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	It aims to revitalise neighbourhoods to make them places we can all be proud to live and work. The Council recognises that Southwark is a borough with a proud heritage and a great future, with one of the most ambitious regeneration programmes in the country.
IIAO 2	To improve the education and skill of the population	✓	✓	It seeks to ensure that targeted support in regeneration areas is provided for the population. This can include upskilling and education of the population.
IIAO 3	To improve the health of the population	✓	✓	It seeks to promote healthy lifestyles and active living by providing green infrastructure and opportunities for health activities and improving streets, squares and public spaces.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	It seeks to improve streets, squares and public spaces which will help reduce the perception or fear of crime and encourage more people to use the spaces which will increase natural surveillance and reduce the opportunity for crime. It will aid the promotion and delivery of a well maintained and inclusive public realm.
			✓✓	It seeks to encourage an active, strong and connected cohesive community by ensuring existing residents benefit from regeneration by receiving support and ensuring everyone has their chance to get their voice heard.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	Its key aim is social inclusion and community cohesion, community engagement where everyone gets to have their say and share in the benefits of regeneration.
IIAO 6	To reduce contributions to climate change	✓	✓	The promotion of places designed to respond to the climate emergency through mitigation and adaptation will encourage low or zero carbon movement, and deliver green infrastructure that can help reduce carbon dioxide, the urban heat island effect and promote health lifestyles.
IIAO 7	To improve the air quality	✓	✓	It seeks to promote green infrastructure which can have a positive effect on air quality, both chemically where NOx and Particulate Matter are absorbed by the green infrastructure and physically, where the green infrastructure can disperse pollutants in the air to minimise their exposure to people.
IIAO 8	To avoid waste and maximise, reuse	✓	✓	It looks to promote heritage-led regeneration to make best use of existing

	or recycle waste arising as a resource			historic building fabric which leads to less consumption of finite resources in demolishing old and constructing new buildings. The policy also looks to encourage new homes above shops, using existing buildings to provide new uses.
<b>IIAO 9</b>	To encourage sustainable use of water resources	✓	✓	The promotion of green infrastructure has the potential to encourage sustainable use of water by reducing the risk of flooding (and so other resources dealing with the impact of flooding) and could include sustainable urban drainage elements which could include recycling, reuse and cleansing of water.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓	✓	The promotion of green infrastructure has the potential to ensure the quality of land and soils is maintained and enhanced. Encouraging new homes above shops means more development on land already built on and not on land where there is virgin soil of ecological and biodiverse value.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	It seeks to promote local distinctiveness and heritage-led regeneration by requiring the highest standards of design, creating attractive, healthy and distinctive buildings and places.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	It seeks to promote local distinctiveness and heritage-led regeneration by requiring the highest standards of design, creating attractive, healthy and distinctive buildings and places.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The promotion of better green infrastructure will help to protect and enhance open spaces, green corridors and biodiversity.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓✓	✓✓	The promotion of better green infrastructure will help to reduce vulnerability to flooding and ensure adaption to climate change. New homes above shops will mean that some new homes will be off the ground floor where vulnerability to flooding is higher in flood risk zones/critical drainage areas.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It sets out that residents will access the benefits of our regeneration programmes and the opportunities created by those programmes for new homes, new jobs and infrastructure
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	The promotion of healthy lifestyles and active living by providing green infrastructure and opportunities for healthy activities and improving streets, squares and public spaces will encourage walking and cycling and reduce reliance on the need to travel by car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	✓	The promotion of green infrastructure and opportunities for healthy activities and improving streets, squares and public spaces will encourage walking and cycling for the current and future generations. As a result

				other policy agendas relating to sustainable travel and development come to fruition.
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P12 – Design of places				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIO 1	To tackle poverty and encourage wealth creation	✓	✓	It recognises that development should allow for accessible and inclusive design for all ages and especially for people with disabilities or those who are mobility impaired. Public realm should be safe, attractive and ease the movement of pedestrians, cyclists and vehicular traffic. These goals are supportive of making transport and facilities accessible.
IIO 2	To improve the education and skill of the population	N/A	N/A	
IIO 3	To improve the health of the population	✓	✓	It provides for the provision of opportunities for formal and informal play. The provision of urban greening and green infrastructure can deliver multiple amenity and environmental benefits within buildings and the public realm.
			✓	It ensures the height scale, massing and orientation of development responds positively to the existing townscape character and context.
			✓	It recognises that urban greening and green infrastructure can deliver multiple amenity and environmental benefits including food growing.
			✓	It recognises the importance of easing the movement of pedestrians, cyclists and vehicular traffic.
IIO 4	To reduce the incidence of crime and the fear of crime	✓	✓✓	It supports development that ensures high quality public realm that is safe, understandable and attractive.
			✓	It encourages active, connected, strong and cohesive communities by ensuring an urban grain and layout that takes into account and improves existing patterns of development and movement, permeability and street widths.
			✓	It recognises that good design is a key aspect of making places better for people. It is important that good quality materials are used in development.
			✓	It supports development utilising active design principles that are fitting to the location, context, scale and type of development.
IIO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	It encourages active, connected, strong and cohesive communities by ensuring an urban grain and layout that takes into account and improves

				existing patterns of development and movement, permeability and street widths.
			✓✓	It supports development that provides accessible and inclusive design for all ages, and especially for people with disabilities or those who are mobility impaired. P12 outlines that development should ensure compliance with the Equalities Act 2010, relevant London Plan policies and Part M of the Building regulations.
			✓	It recognises the importance of easing the movement of pedestrians, cyclists and vehicular traffic.
			✓	It supports the provision of opportunities for formal and informal play. The provision of urban greening and green infrastructure can deliver multiple amenity and environmental benefits within buildings and the public realm.
			✓	It supports development that ensures an urban grain and layout that takes into account and improves existing patterns of development and movement, permeability and street width. P12 supports development which provides accessible and inclusive design for all ages, and especially for people with disabilities or those who are mobility impaired.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	It recognises that the provision of urban greening and green infrastructure can deliver multiple amenity and environmental benefits within buildings and the public realm, such as helping to reduce the urban heat island effect, where urban areas become significantly hotter than rural areas in summer.
<b>IIAO 7</b>	To improve the air quality	✓	✓	It recognises that the enhancement of areas through urban greening can create healthier places by reducing air pollution.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	✓	✓	It recognises that the provision of urban greening and green infrastructure can deliver multiple amenity and environmental benefits such as reducing the impact of surface water flooding.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓✓	✓✓	It supports development which ensures high standards of design with commensurate consideration given to visual appearance, composition, aesthetics and detailing.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It outlines that it is important to take the principles of urban design into consideration when designing new development, in order to ensure that new development improves the environment.

			✓✓	It supports development that ensures the height, scale, massing and orientation of development responds positively to the existing townscape.
IIAO 12	To conserve and enhance the historic environment and cultural assets	ü	✓	It supports development that ensures the height, scale, massing and orientation of development responds positively to the existing townscape.
			✓	It recognises that it is important to take the principles of urban design into consideration when designing new development, in order to ensure that new development improves the environment so that people want to spend time in the place. The principles extend to the internal design and the spaces between buildings, as well as the appearance of buildings. Developments must be designed to ensure accessibility, inclusivity and interaction regardless of disability, age or gender and to allow all to participate equally.
			✓✓	It recognises that it is important to protect local character. Good public realm design is essential to help people move around the borough as it improves the streetscape, and creates a sense of place with vibrant, pleasant environments that people will take pride in and enjoy Ensuring visual amenity and the spatial diversity of communities is respected.
			✓✓	It recognises that the provision of urban greening and green infrastructure can deliver multiple amenity and environmental benefits, providing opportunities for recreation including formal and informal play.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	It recognises that the provision of urban greening and green infrastructure can deliver multiple amenity and environmental benefits, providing opportunities for recreation and biodiversity.
IIAO 14	To reduce vulnerability to flooding	✓✓	✓✓	It recognises that the provision of urban greening and green infrastructure can deliver multiple amenity and environmental benefits within buildings and the public realm such as helping to reduce the impact of surface water flooding.
IIAO 15	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	It recognises that developments must be designed to ensure accessibility, inclusivity and interaction regardless of disability, age or gender and allow all to participate equally, confidently and independently in everyday activities.
			✓✓	It supports development that ensures a high quality public realm that is safe, understandable and attractive and that ease the movement of pedestrians, cyclists.

			✓✓	It supports development that provides accessible and inclusive design for all ages, and especially for people with disabilities or those who are mobility impaired. Development should ensure compliance with the Equalities Act 2010, relevant London Plan policies and Part M of the Building Regulations.
			✓✓	It supports development that provides accessible and inclusive design for all ages, and especially for people with disabilities or those who are mobility impaired. Development should ensure compliance with the Equalities Act 2010, relevant London Plan policies and Part M of the Building Regulations.
<b>I1AO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It supports development which ensures a high quality public realm that is safe, understandable and attractive and that eases the movement of pedestrians, cyclists and vehicular traffic.
			✓✓	It recognises that the provision of urban greening and green infrastructure can deliver multiple amenity and environmental benefits within buildings and the public realm.

P13 – Design quality				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓	✓	It recognises that good design is a key aspect of making places better for people, and supports development which utilises active design elements that are fitting to the location, context, scale and type of development. In addition to healthcare and services, such as GPs and clinics, other environmental and social conditions are known to influence people's health. Therefore the internal layout of buildings can be designed to encourage activity.
			✓	It ensures the height scale, massing and orientation of development responds positively to the existing townscape character and context.
			✓	It supports development which ensures existing patterns of pedestrian and cycling movement are taken into account and improved.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	It supports development which ensures accessibility and inclusive design for all.
			✓✓	It supports development which ensures the existing movement patterns of different road users, including pedestrian and cycling, are taken into account and improved.
IIAO 6	To reduce contributions to climate change	✓	✓	It recognises that sustainable design must reduce energy consumption and carbon dioxide emissions, reduce flood risk and pollution, ensure the avoidance of internal overheating, minimise the urban heat island effect and the creation of adverse local climatic conditions.
IIAO 7	To improve the air quality	✓	✓	It recognises that sustainable design must reduce energy consumption and carbon dioxide emissions.
			✓	It supports development which ensures existing patterns of pedestrian and cycling movement are taken into account and improved, so as to encourage the reduced usage in private cars and decrease in emission of air pollutants.
			✓	It supports development that implements sustainable design and

				construction techniques.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	✓	It recognises that sustainable design must minimise the consumption of natural resources.
IIAO 9	To encourage sustainable use of water resources	✓	✓	It recognises that sustainable design must reduce flood risk. It ensures that the resource use to support the building is sustainable and adequate servicing exists to support the building and land use.
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape		✓✓	It supports development which ensures buildings, public spaces and land uses are positioned according to their function, impact and use. It also recognises that it is important to take the principles of urban design into consideration when designing new development, in order to ensure that new development improves the environment so that people want to spend time in the place.
			✓✓	It recognises that good design is a key aspect of making places better for people. Southwark has a range of different neighbourhoods and areas contributing to its local distinctiveness, and this diversity will be reflected in new development.
			✓✓	Recognising that good design is a key aspect of making places better for people, It supports development which ensures high standards of design with commensurate consideration given to visual appearance, composition, aesthetics and detailing.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	It supports development which ensures high standards of design with commensurate consideration given to visual appearance, composition, aesthetics and detailing to ensure new buildings and alterations to existing buildings have a reactive design solution that is specific to the site's shape, size and location. Southwark has a range of different neighbourhoods and areas contributing to its local distinctiveness, and this diversity will be reflected in new development.
			✓✓	It recognises that good design is a key aspect of making places better for people. It is important that good quality materials are used in development, which can greatly contribute to the overall impression of a building, as well as how it relates to its area. During the construction process, it also supports development which implements sustainable design and construction techniques.
IIAO 13	To protect and enhance open spaces,	ü	✓	It supports development that ensures existing patterns of pedestrian and

	green corridors and biodiversity			cycling movement are taken into account and improved. It ensures that buildings are appropriately constructed to be fitting to location, context, scale and surrounding spaces.
IIAO 14	To reduce vulnerability to flooding	✓✓	✓✓	It recognises that sustainable design must reduce flood risk. It recognises the adequate servicing within the footprint of the building for land-use, which supports mitigation of flood risk.
IIAO 15	To provide everyone with the opportunity to live in a decent home	✓	✓	It supports development which ensures high standards of design with commensurate consideration given to visual appearance, composition, aesthetics and detailing to provide a decent living condition both within the residential unit and the public realm around the building.
IIAO 16	To promote sustainable transport and minimise the need to travel by car	✓	✓	It supports development which utilises active design principles that are fitting to the location, context, scale and type of development and ensures the environment is designed to take into account and improve existing patterns of pedestrian and cycling movement, thus encourage active travel.
			✓✓	It supports development which ensures accessibility and inclusive design for all.
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓	✓	It supports development which utilises active design principles that are fitting to the location, context, scale and type of development and ensures existing patterns of pedestrian and cycling movement are taken into account and improved.

P14 Residential design				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A		
IIAO 2	To improve the education and skill of the population	N/A		
IIAO 3	To improve the health of the population	✓	✓	It recognises good quality housing helps to improve the health, safety, amenity and quality of life of current and future residents. Southwark has an aging population and the Council want all residents to be able to stay in their homes throughout different phases of their life into old age. It is important that family housing provides private amenity space to ensure that children have somewhere safe to play. In addition, communal play areas are ensured to encourage activities for children, parents and carers to exercise and socialise.
			✓	It supports development which encourages communal amenity space designed to provide multiple benefits including food growing.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A		
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	It seeks to provide good quality housing, including facilities and amenities for young people which will help to promote social inclusion, equality, diversity and community cohesion, particularly between different income groups due to requiring homes are tenure blind.
IIAO 6	To reduce contributions to climate change	✓	✓	It requires that new homes utilise non-mechanical ventilation systems, be dual aspect and allow for natural cross ventilation and demonstrate how overheating will be avoided for single aspect flats; all of these parts of the policy will maximise efficient use of finite resources for things like energy for heating and cooling, in turn contributing to reducing the impacts of climate change.
IIAO 7	To improve the air quality	✓	✓	It requires that new homes be dual aspect and allow for natural cross ventilation or demonstrate good levels of privacy and ventilation to all rooms for single aspect flats, these design requirements will help improve the internal air quality of new homes.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A		
IIAO 9	To encourage sustainable use of water	N/A		

	resources			
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A		
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A		
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A		
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	It supports development which encourages communal amenity space designed to provide multiple benefits including natural habitat creation.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	It supports development which encourages communal amenity space designed to provide multiple benefits including sustainable drainage systems (SUDs).
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Its key aim is to provide decent homes with all the requirements for residential design standard set out in the policy. The inclusion of larger space standards for Aylesbury Action Area Core will ensure residents benefit from more spacious homes which are of a similar large dimension to the homes that they are replacing.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A		
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A		

<b>P15 – Designing out crime</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	It will help provide buildings and spaces that are safe and well designed, helping attract businesses to establish and locate in Southwark.
<b>IIAO 2</b>	To improve the education and skill of the population	N/A	N/A	
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Designing out crime in developments can contribute to better mental health and emotional wellbeing, particularly for groups who may feel more vulnerable in the urban environment and are at greater risk of being victims of crime, such as the elderly or women.

<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Its key aim is to reduce the incidence of crime and the fear of crime through the measures prescribed for development in the policy.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	ü✓	✓✓	It seeks to reduce the opportunity and fear of crime in the urban environment. This will significantly enhance social inclusion, equality and diversity and help create community cohesion. The policy outlines the importance of natural surveillance through design and a permeable street network that is easy to navigate for people of all abilities, ages and groups. P15 will have a particularly positive impact on physically vulnerable groups such as older people, the mobility impaired or children.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	It seeks to make streets and public realm easy to navigate and usable, which will make walking and cycling more attractive. This should encourage more people to take up walking and cycling rather than more polluting forms of transport such as the private car. This in turn will help reduce carbon emissions and so contributions to climate change.
<b>IIAO 7</b>	To improve the air quality	✓	✓	It seeks to make streets and public realm easy to navigate and usable, which will make walking and cycling more attractive. This should encourage more people to take up walking and cycling rather than more polluting forms of transport such as the private car. This in turn will help reduce pollutants such as NOx and particulate matter.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	It seeks to make streets and public realm easy to navigate and usable, which is highly likely to either directly or indirectly will help protect and enhance the quality townscape and landscape, including making the relationship between different buildings, streets and other townscape elements relate to each other, particularly for wayfinding purposes.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	It seeks to make streets and public realm easy to navigate and usable, which is highly likely to either directly or indirectly will help to conserve the historic environment, cultural assets and their settings.
<b>IIAO 13</b>	To protect and enhance open spaces,	N/A	N/A	

	green corridors and biodiversity			
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	It outlines how signage and layout of development will make the public realm and public transport more attractive and safer to use. This will help to reduce the use of cars as walking and the use of public transport becomes more attractive
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P16 – Tall buildings				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	It recognises that tall buildings, if designed thoughtfully, can be an important component in contributing to an area's regeneration. They can improve access to low-cost transport and other facilities by being able to accommodate more people, whether workers or residents, near these facilities and transport options.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓	✓	Tall buildings will help to contribute to higher-density neighbourhoods, encouraging walking, cycling and use of public transport through and between walkable neighbourhoods, which promote health by keeping active and minimising air pollution.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	It requires tall buildings to provide functional public space commensurate to the scale of the development when above 30m with widened footways and routes to accommodate increased footfall. This will encourage activity in these spaces, reducing the fear or perception of crime and the opportunity for criminal activity.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	It requires that tall buildings provide a new publically accessible space at or near the top of the building and communal facilities for residents and building users. These inclusive aspects of tall buildings will help promote community cohesion and intermingling for people from different backgrounds and lifestyles.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	It requires that tall buildings maximise energy efficiency and prioritise the use of sustainable materials.
IIAO 7	To improve the air quality	✓	✓	It should indirectly help to improve air quality by contributing to higher-density neighbourhoods, encouraging walking, cycling and use of public transport through and between walkable neighbourhoods, which promotes active travel that does either does not pollute or pollutes significantly less per person than other transport modes.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	

<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓ ✓✓	✓✓	It requires that tall buildings respond positively to local character and townscape and be of exemplary architectural design.
			✓✓	Tall buildings have the potential to have a negative impact on important strategic and local views. However this policy requires that tall buildings make a positive contribution to the London skyline and must not cause harm to strategic and borough views or to the significance of a designated heritage asset.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	It requires tall buildings avoid unacceptable harm to the significance of designated heritage assets their settings.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓✓	Tall buildings, by virtue of being high density, can help contribute to the demand for, and promote the uptake of active travel and use of public transport through and between walkable neighbourhoods, which in turn should reduce the need to travel by car.
			✓	The tall buildings policy recognises that the tallest buildings should be located in locations that benefit from high public transport accessibility to reduce the dependence on single motor vehicles and access to public transport.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The requirement for communal and public community facilities will help to contribute towards the borough's overall social and community infrastructure offer and provision. The requirement for new public space and footway widening will ensure the spaces around tall buildings will be able to accommodate the increase in the number of people moving through as a result of the building be occupied.

P17 – Efficient use of land				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	An efficient use of land will likely indirectly help to improve access to low-cost transport options and other facilities, including temporary 'meanwhile' uses which provide community benefits, by virtue of an efficient use of land comprising the appropriate density which will see demand stimulated for such low cost transport options and other facilities which will, if not already, then be delivered. This in turn will contribute to reducing poverty and encouraging wealth creation. The policy will also seek to promote successful neighbourhoods for all.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓	✓	It permits temporary 'meanwhile' uses which could include temporary allotments to produce locally grown food or other local community projects that promote inclusiveness and target specific groups, which in turn will help improve mental and emotional health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	It permits temporary 'meanwhile' uses which mean that sites could be full of activity when they would otherwise be lying dormant. This will help reduce the fear and perception of crime as well as the opportunity for criminal activity to take place.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	It permits temporary 'meanwhile' uses which could include temporary allotments to produce locally grown food or other local community projects that promote inclusiveness and target specific groups, which in turn will help improve social inclusion, equality, diversity and community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	It requires an efficient use of land, which is a finite resource. An efficient use of a finite resource will ensure contributions to climate change are minimised and/or reduced.
			✓✓	It requires that development does not compromise sites adjacent, ensuring that all sites can maximise their potential in contributing to sustainable development, including conforming to other policy requirements.
			✓✓	It permits temporary 'meanwhile' uses, encouraging the re-use or improvement of buildings and land that are vacant, underutilised or in disrepair.

<b>IIAO 7</b>	To improve the air quality	N/A	N/A	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	✓	It indirectly helps to minimise waste by 'recycling' land via the temporary 'meanwhile' uses which may be permitted.
			✓	It indirectly helps to minimise waste by ensuring that adjacent sites are not compromised by any development, thereby reducing the potential for the adjacent sites to be wasted.
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓	✓	It promotes re-use of previously developed land and buildings through the temporary 'meanwhile' use criteria.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	It incorporates sustainable design and construction activities by virtue of ensuring the most efficient use of land, which will help to ensure the building is designed and constructed with an appropriate lifespan and not be prematurely demolished or requiring heavy investment in refurbishment and retrofitting in aspects such as servicing facilities, circulation space and access to, from and through the site. This will ensure the quality of the landscape and townscape is protected and enhanced during the lifespan of the building.
			✓✓	It will improve the relationship between different buildings, streets, parks and waterways due to the requirement to not unreasonably compromise the development potential or legitimate activities on neighbouring sites.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	It has the potential to conserve and enhance the existing historic environment and cultural assets through the temporary 'meanwhile' uses criteria.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	It has the potential to protect and enhance existing and deliver new open and green spaces, corridors and habitats through the temporary 'meanwhile' uses criteria.
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It requirements consciously seek to ensure that development potential of or other legitimate activity carried out on neighbouring sites is not impeded upon. This could include land uses which contain social, environmental and physical infrastructure. Temporary 'meanwhile' uses

				may include elements of social or environmental infrastructure.
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P18– Listed buildings and structures				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	It ensures the protection and enhancement of listed buildings contributes to successful neighbourhoods for all which reference and are built upon a shared collective history. This can help to reduce poverty and, particularly if listed buildings are used for employment or educational purposes and open to the public.
			✓	It has the potential to promote and enable tourism opportunities to be exploited and employment created where listed buildings are significant.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	N/A	N/A	
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	N/A	N/A	
IIAO 6	To reduce contributions to climate change	?	?	There will be the opportunity to do some mitigation measures on any development undertaken in listed buildings however the (carbon) savings achievable will likely be less than for other buildings due to its old building techniques. Nevertheless, viable use on listed buildings can actually help reduce the waste and inefficient use of resources without the need for new builds that require use of finite resources. In turn, the effect of using or revitalising listed buildings on reducing contributions to climate change is uncertain.
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	?	?	There will likely be limits on the extent that any development activity undertaken on listed buildings will be able to contribute to avoiding waste and maximising reuse, recycling waste as a resource. There will be the opportunity to do some measures however the amount of waste likely to be able to be re-used and recycled may be less than for other buildings. However, viable use on listed buildings can actually help reduce the waste without the need for demolition and new build which produce waste otherwise. Therefore, the effect on waste reduction is uncertain.
IIAO 9	To encourage sustainable use of water	x	x	There will likely be limits on the extent that any development activity

	resources			undertaken on listed buildings will be able to contribute to encouraging sustainable use of water resources and maximising water reuse and recycling water, relative to other development undertaken on non-listed buildings. There will be the opportunity to do some measures however the water efficiency measures incorporated are likely to be provide less savings/smaller efficiencies than those achievable on other types of development.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Listed buildings and structures often comprise key components of a valued quality landscape and townscape. The policy seeks to protect these and where development activity on them is undertaken, make sure they are enhanced.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Its key aim is for the conservation, protection, maintaining and enhancing of the setting and condition of the features of the historic environment.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	x	x	The potential for the listed buildings to reduce vulnerability to flooding by, for example, the incorporation of sustainable urban drainage measures, is likely to be significantly less than non-listed buildings.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓	✓	Development undertaken on listed buildings may allow for new homes to be delivered in innovated forms and using interesting design solutions imposed by the limits of listed building status, while still ensuring the important historic fabric of the building is retained.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	Development undertaken on listed buildings may allow previously under occupied listed buildings located in sustainable town centre locations or areas with high public transport accessibility levels, to be re-configured to a more efficient use which, were the listed building not available for development, may otherwise have to locate outside the high PTAL/connected areas. However, the policy still ensures the important built fabric of the historic building is retained. Development in these locations, particularly when undertaken on a listed building (which itself adds to the attraction of a sustainable high PTAL/town centre location) will reduce the need to travel by car and encourage active travel or travel by public transport.

<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	✓	Allowing development on listed buildings may provide the opportunity to deliver social or other types of infrastructure (providing the historic building fabric is maintained) which would otherwise be required to find an alternative location.
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P19 – Conservation areas				
IIA Objectives	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	N/A	N/A	
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	N/A	N/A	
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	✓	It seeks to ensure that a viable use of heritage assets that is consistent with its on-going and long-term conservation is enabled. This means the re-use and re-cycling of existing buildings can help reduce the waste and inefficient use of resources that would otherwise occur during demolition and new build construction.
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Its key aim is for the conservation, protection, maintaining and enhancing of the setting and condition of the features of the historic environment which has been identified as having a quality worthy of protection.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Its key aim is for the conservation, protection, maintaining and enhancing of the setting and condition of the features of the historic environment which has been identified as having a quality worthy of protection.
			✓✓	Its key aim is for the conservation and enhancing the significance of the identified elements of the historic environment and natural heritage which often make significant contributions to the townscape and landscape of a site or location.

<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A		
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A		
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A		
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A		
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A		

**P20 – Conservation of the historic environment and natural heritage**

IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓	✓	It identifies selected types of green infrastructure to be conserved and enhanced which can contribute to the health and wellbeing of people including registered parks and gardens, trees, hedgerows and the greenery contained in the protected London Squares.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	It identifies selected types of green infrastructure to be conserved and enhanced which can contribute to social inclusion and community cohesion, including registered parks and gardens, trees, hedgerows and the greenery contained in the protected London Squares.
IIAO 6	To reduce contributions to climate change	✓	✓	It identifies selected types of green infrastructure to be conserved and enhanced which can absorb greenhouse gases and contribute to mitigating climate change, including registered parks and gardens, trees, hedgerows and the greenery contained in the protected London Squares.
			✓	It seeks to ensure that a viable use of heritage assets that is consistent with its on-going and long-term conservation is enabled. This means the re-use and re-cycling of existing buildings can help reduce the carbon emissions (and contribution to climate change) that would otherwise be spent during demolition and new build construction.
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of	ü	✓	One of its key aims is for the conservation, and enhancement of the

	landscape and townscape			identified heritage assets which often make a significant contribution to the quality of the local town and landscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	One of its key aims is for the conservation, and enhancement of the historic built and natural environment which by extension have significant cultural value.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	It identifies selected types of green infrastructure to be conserved and enhanced which contribute significantly to the borough's offer of green and open space, biodiversity and habitat, including registered parks and gardens, trees, hedgerows and the greenery contained in the protected London Squares.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	It identifies selected types of green infrastructure to be conserved and enhanced which contribute significantly to the borough's ability to provide a slower rate of infiltration into the water table. This rate determines the risk of surface water flooding. The green infrastructure identified includes: registered parks and gardens, trees, hedgerows and the greenery contained in the protected London Squares.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P21 – Borough views				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	N/A	N/A	
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	N/A	N/A	
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It will not have a negative impact on important strategic or local views but rather seeks to protect and enhance these views.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	It will help protect, maintain and enhance the setting of features of cultural and historical heritage in the environment.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
IIAO 14	To reduce vulnerability to flooding	N/A	N/A	
IIAO 15	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
IIAO 16	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
IIAO 17	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P22 – Archaeology				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	It has the potential to promote and enable tourism opportunities to be exploited and employment created where archaeological finds are significant.
IIAO 2	To improve the education and skill of the population	✓	✓	It has the potential to contribute to the education of the population should a programme of excavation, recording, achieving, publishing and display of finds be required, particularly if a programme of public engagement is required.
IIAO 3	To improve the health of the population	N/A	N/A	
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	It has the potential to encourage and foster an active, connected, strong and cohesive community where a programme of public engagement with archaeological finds is required. In turn this will help to reduce the fear and perception of crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	It has the potential to support voluntary and community sectors and active community engagement where a programme of public engagement is required for archaeological finds.
IIAO 6	To reduce contributions to climate change	x	x	Depending on the nature of the works required, P20 will not necessarily contribute to reducing carbon emissions and/or climate change. This is because the requirements for archaeological finds to be carefully excavated and/or recorded and archived which will use resources. Were the policy not in place, these extra resources (and so carbon emissions) would not have to be spent. However, the benefits of protecting archaeological finds are considered to significantly outweigh the disbenefits identified in the increase in carbon emissions.
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	N/A	N/A	
IIAO 12	To conserve and enhance the historic	ü✓	✓✓	Its key aim is for the conservation and enhancing the significance of

	environment and cultural assets		✓✓	historical, cultural and archaeological heritage in the environment
				It will promote the historic environment and contribute to a better understanding of the historic environment.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P23 – World heritage sites				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	It has the potential to promote and enable tourism opportunities to be exploited and employment created in the parts of London where the world heritage sites have been identified.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	N/A	N/A	
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	N/A	N/A	
IIAO 6	To reduce contributions to climate change	?	?	It may be that protection of views to, from and across world heritage sites may result in buildings and spaces that, in respecting the world heritage sites, are required to use more resources and/or emit more carbon emissions than they otherwise would without the requirements set out in this policy. However, the benefits are considered to significantly outweigh any disbenefits.
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Its key aim is for the conservation and enhancement of the setting of local landscape, townscape and visual amenity.
			✓✓	It seeks to improve the relationship between different buildings, streets, parks and waters and other spaces that make up the townscape character.
			✓✓	It will not have a negative impact on important strategic or local views but rather seeks to protect and enhance these views.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Its key aim is for the protection, maintenance, enhancement of the setting of significant historical and cultural sites in London
IIAO 13	To protect and enhance open spaces,	N/A	N/A	

	green corridors and biodiversity			
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P24 – River Thames				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	Parts of the Thames Policy Area contain the Strategic Cultural Area and lies within the Central Activities Zone, both of which contain key tourist attractions and visitor accommodation and facilities. The protection and enhancement of the Thames, Thames Path and the river's relationship to the built environment will continue to allow for tourism opportunities to be exploited and created.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓	✓	The River Thames is a significant open space which provides areas of both recreation and leisure activities as well as calm and respite from the built up nature of London. Access to these areas provide an important 'breathing space' and the protection and enhancing of sites within the Thames Policy Area will help contribute to the continued enjoyment and value of these spaces, in turn contributing to physical and mental well being.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	It seeks to maintain and enhance the existing facilities that support and increase the use and enjoyment of the river, including transport facilities for passengers, freight and tourists which have the potential to promote social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	✓	✓	It seeks to maintain and enhance the existing facilities that support and increase the use and enjoyment of the river, including transport facilities for passengers, freight and tourists. The river is currently an underutilised transport artery and its use for this purpose could reduce reliance on other less sustainable forms of travel on London's congested roads such as cars. Transferring people from private transport to public transport is one way we can reduce contributions to climate change.
IIAO 7	To improve the air quality	✓	✓	It seeks to maintain and enhance the existing facilities that support and increase the use and enjoyment of the river, including transport facilities for passengers, freight and tourists. The river is currently an underutilised transport artery and its use for this purpose could reduce reliance on other less sustainable forms of travel on London's

				congested roads such as cars. This has the potential to improve air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	✓	✓	It seeks to maintain and enhance the existing facilities that support and increase the use and enjoyment of the river, including transport facilities for passengers, freight and tourists. The river is currently an underutilised transport artery and its use for this purpose could constitute the sustainable use of water resources that reduces reliance on other less sustainable forms of travel on London's congested road.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It seeks to conserve and enhance the local landscape and visual amenity and improve the relationship between different buildings, streets, parks and waters and other spaces that make up the townscape character.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	It seeks to have a positive impact on important strategic and local views including borough views and those identified in the London View Management Framework.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓✓	It seeks to ensure the designated open water space of the River Thames is protected and enhanced.
			✓	It seeks to maintain biodiversity by requiring development in the Thames Policy Area to avoid unacceptable harm to biodiversity if proposing new mooring facilities.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓✓	✓✓	It requires that development adjacent to the River Thames maintain, remediate and improve flood defence walls and where next to culverts should demonstrate that the development will not undermine the structural integrity or detrimentally impact upon its intended operation.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	It seeks to maintain and enhance the existing facilities that support and increase the use and enjoyment of the river, including transport facilities for passengers, freight and tourists. The river is currently an underutilised transport artery and its use for this purpose could reduce reliance on other less sustainable forms of travel on London's

				congested roads such as cars.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It requires that development adjacent to the River Thames maintain, remediate and improve flood defence walls and where next to culverts should demonstrate that the development will not undermine the structural integrity or detrimentally impact upon its intended operation.

<b>P25 – Local list</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	N/A	N/A	
<b>IIAO 2</b>	To improve the education and skill of the population	N/A	N/A	
<b>IIAO 3</b>	To improve the health of the population	N/A	N/A	
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	N/A	N/A	
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓	✓	The local list policy will ensure that all users are able to participate in the recognition of the important assets in their locality with a view to have them included in the borough's local list. By encouraging them to nominate heritage assets, it will in turn promote equality, active engagement as well as community cohesion in the process of new development that take into account the community's view.
<b>IIAO 6</b>	To reduce contributions to climate change	N/A	N/A	
<b>IIAO 7</b>	To improve the air quality	N/A	N/A	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	The local list policy will ensure that undesignated heritage assets, which constitutes a significant part of the local townscape and landscape, will be safeguarded and integrated with new development.
<b>IIAO 12</b>	To conserve and enhance the historic	ü	✓	The local list policy will ensure that undesignated heritage assets,

	environment and cultural assets			which are of high historic and cultural values, will be safeguarded and integrated with new development.
			✓	The local list policy will enable the better audit of the undesignated heritage assets in the borough and will promote the recognition of those structures that are historically significant but do not benefit from a Listed designation.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

## Integrated impact assessment for

### Strategic Policy 3 A great start in life

Including

SP3: A great start in life

P26: Education places

P27: Access to Employment and Training

	SP3	P26	P27
IIAO 1	✓✓	✓✓	✓✓
IIAO 2	✓✓	✓✓	✓✓
IIAO 3	✓✓	✓✓	✓✓
IIAO 4	✓	N/A	✓
IIAO 5	✓✓	✓✓	✓✓
IIAO 6	N/A	N/A	N/A
IIAO 7	N/A	N/A	N/A
IIAO 8	N/A	N/A	N/A
IIAO 9	N/A	N/A	N/A
IIAO 10	N/A	N/A	N/A
IIAO 11	N/A	N/A	N/A
IIAO 12	✓	N/A	N/A
IIAO 13	✓	N/A	N/A
IIAO 14	N/A	N/A	N/A
IIAO 15	N/A	N/A	N/A

<b>IIAO 16</b>	N/A	N/A	N/A
<b>IIAO 17</b>	✓✓	✓✓	N/A
<b>Avg.</b>	<b>82%</b>	<b>100%</b>	<b>100%</b>

SP3 – A great start in life				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	It will help to contribute to reducing poverty and inequalities particularly for young people, by improving access to care, education and services for young people and parents.
				It seeks to reduce poverty by providing school places and high quality play facilities in every neighbourhood.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The key aim is to improve the education and skill of the population through an increase in new and improved educational, play and health facilities and services, including school places, apprenticeships, quality playgrounds, library access and specialist services for particular groups.
IIAO 3	To improve the health of the population	✓✓	✓✓	It makes a commitment to providing free healthy school meals for primary schools and nurseries, quality playgrounds in every neighbourhood and increased educational support and access to services. These things will all help to improve the health of the population, from the earliest possible age.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓✓	The focus on education and support services, particularly for young people, people with special educational needs, vulnerable people and young families will reduce the perceived need for any members of the above groups to turn to criminal activity to get by, which can sometimes occur as a result of the challenges faced by individuals within the above or any other groups due to social isolation and mental health issues.
			✓	It seeks to deliver new playgrounds, which will mean more activity in the public realm, reducing the fear and perception of crime and opportunity for crime
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The primary focus is to promote social inclusion, equality, diversity and community cohesion by implementing measures that will help to give every child and young person the opportunity to reach their potential. The policy seeks to encourage developments where there can be interaction between people of all ages, promoting diversity within communities. Whether by increasing voluntary and community services and support for the young, vulnerable and those with special educational needs or by providing the community facilities and spaces

				in which educational and support services can be delivered, young people, children and vulnerable groups will especially benefit from SP3.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	N/A	N/A	
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓	✓	It seeks to provide quality playgrounds in every local area, which contributes to maintaining or increasing access to leisure and sporting facilities which falls under the objective of conserving and enhancing cultural assets, depending on the nature of the playground.
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	It seeks to provide quality playgrounds in every local area, which contributes to protecting and enhancing open and green space, depending on the nature of the play ground.
IIAO 14	To reduce vulnerability to flooding	N/A	N/A	
IIAO 15	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
IIAO 16	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
IIAO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to provide the right social infrastructure to ensure children and young adults, vulnerable people and those with specialist educational needs are not held back by a lack of educational resources and support. This may include the introduction of shared community uses and co-location of services. The policy seeks to provide superfast broadband for all our residents so that everyone can harness the benefits of technology, supporting digital inclusion.

P26 – Education places				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	It seeks to permit enough school places to meet demand and ensure new schools are designed and built to a high standard. This will help ensure that all children, young people and those returning to further and higher education will be able to make the most of their education, contributing to better attainment and reducing the chances of poverty for individuals.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Its key aim is to contribute to improving the skill and education of the population by ensuring there are enough school places in the borough and schools and other educational facilities will be well designed to maximise the benefits of learning in a good environment.
IIAO 3	To improve the health of the population	✓✓	✓✓	It seeks to incorporate design criteria for schools and educational facilities that will contribute to the health of the population, including good internal and external air quality, adequate levels of daylight and sunlight and high quality external areas.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Schools and educational facilities can serve as community hubs which allow for disparate peoples to come together for shared experiences with a common goal: education and learning. Delivering school places and well designed schools and educational facilities will help to promote social inclusion, equality, diversity and community cohesion. P26 requires that school and other education facilities be available for local residents to use. This will also promote community cohesion and social inclusion, as while likely benefitting young people more overall, requirements of P26 will mean that the policy benefits other groups also.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water	N/A	N/A	

	resources			
I1AO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
I1AO 11	To protect and enhance quality of landscape and townscape	N/A	N/A	
I1AO 12	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
I1AO 13	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
I1AO 14	To reduce vulnerability to flooding	N/A	N/A	
I1AO 15	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
I1AO 16	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
I1AO 17	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to ensure that where development will increase demand for school places that these are delivered.

<b>P27 – Access to Employment and Training</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
I1AO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	It aims to improve education and jobs for local people by creating training and employment opportunities at all stages of major development. This will help ensure that young people and those returning to further and higher education will be able to make the most of their education, contributing to better attainment and reducing the chances of poverty for individuals.
I1AO 2	To improve the education and skill of the population	✓✓	✓✓	Its key aim is to contribute to improving the skill and education of the population by ensuring there is enough access to employment and training in areas that are experiencing regeneration. In this way local residents are able to receive benefits from the development on going, and make them a part of new community being established.
I1AO 3	To improve the health of the population	✓✓	✓✓	It aims to provide employment opportunities which has a positive correlation with improved health outcomes as people have more control over their own lives.
I1AO 4	To reduce the incidence of crime and	✓	✓	By providing education and skills opportunity there is a potential

	the fear of crime			indirect impact on reduced incidences of crime or fear of crime. It reduces the risk of antisocial behaviour and offending.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The creation of jobs and training opportunities will positively impact the prosperity of communities and enables greater social cohesion. It also reduces the risk of antisocial behaviour and offending.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	N/A	N/A	
IIAO 12	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
IIAO 14	To reduce vulnerability to flooding	N/A	N/A	
IIAO 15	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
IIAO 16	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
IIAO 17	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

## **Integrated impact assessment for**

### **Strategic Policy 4 A green and inclusive economy**

Including

- P28: Strategic protected industrial land
- P29: Office and business development
- P30: Affordable workspace
- P31: Small shops
- P32: Business relocation
- P33: Railway arches
- P34: Town and local centres
- P35: Development outside town centres
- P36: Protected shopping frontages
- P37: Shops outside protected shopping frontages, town and local centres
- P38: Shop fronts
- P39: Betting shops, pawnbrokers and pay day loan shops
- P40: Hotels and other visitor accommodation
- P41: Pubs
- P42: Outdoor advertisements and signage
- P43: Broadband and digital infrastructure

	SP4	P28	P29	P30	P31	P32	P33	P34	P35	P36	P37	P38	P39
IIAO 1	✓✓	✓✓	✓✓	✓	✓✓	N/A	✓✓	✓	✓	✓	✓	✓	✓✓
IIAO 2	✓✓	✓✓	N/A	✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 3	✓✓	x	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	?	✓	✓	N/A	✓✓
IIAO 4	N/A	x	✓	✓✓	N/A	N/A	✓✓	✓✓	✓	✓	✓	✓	✓
IIAO 5	✓✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	?	✓	✓	✓	✓✓
IIAO 6	✓✓	?	✓	N/A	N/A	N/A	✓	✓✓	?	✓	✓	N/A	N/A
IIAO 7	✓	x	✓	N/A	N/A	N/A	✓	✓✓	?	✓	✓	N/A	N/A
IIAO 8	✓✓	N/A	N/A	N/A	N/A	N/A	✓✓	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 10	N/A	✓✓	✓	N/A	N/A	N/A	✓	✓	N/A	N/A	N/A	N/A	N/A
IIAO 11	N/A	?	N/A	✓✓	N/A	N/A	✓✓	✓✓	N/A	N/A	N/A	✓	N/A
IIAO 12	N/A	?	N/A	N/A	N/A	N/A	✓✓	✓✓	N/A	N/A	N/A	✓	N/A
IIAO 13	N/A	?	✓	N/A	N/A	N/A	✓	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 14	N/A	x	x	N/A	N/A	N/A	x	x	x	N/A	N/A	N/A	N/A
IIAO 15	N/A	N/A	✓✓	N/A	N/A	N/A	✓✓	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 16	✓✓	N/A	✓	N/A	N/A	N/A	✓	✓✓	?	✓	✓	N/A	N/A
IIAO 17	N/A	N/A	N/A	✓	✓	N/A	✓	✓✓	?	✓	✓	N/A	N/A
<b>Avg.</b>	<b>93%</b>	<b>19%</b>	<b>59%</b>	<b>79%</b>	<b>88%</b>	<b>100%</b>	<b>70%</b>	<b>79%</b>	<b>17%</b>	<b>50%</b>	<b>50%</b>	<b>50%</b>	<b>88%</b>

Cont'd	P40	P41	P42	P43
IIAO 1	✓✓	✓	N/A	✓✓
IIAO 2	N/A	N/A	N/A	N/A
IIAO 3	N/A	✓✓	N/A	✓✓
IIAO 4	✓✓	?	N/A	N/A
IIAO 5	✓	✓✓	✓	✓
IIAO 6	N/A	N/A	✓	N/A
IIAO 7	N/A	N/A	N/A	N/A
IIAO 8	N/A	N/A	N/A	N/A
IIAO 9	N/A	N/A	N/A	N/A
IIAO 10	N/A	N/A	N/A	N/A
IIAO 11	✓	✓✓	✓✓	✓✓
IIAO 12	✓	✓✓	✓✓	✓✓
IIAO 13	N/A	N/A	✓✓	✓✓
IIAO 14	N/A	N/A	N/A	N/A
IIAO 15	N/A	N/A	N/A	N/A
IIAO 16	N/A	N/A	N/A	N/A
IIAO 17	✓	✓✓	N/A	✓✓
Avg.	67%	92%	80%	93%

SP4 – A green and inclusive economy				
IIA Objective	Description	Averaged Grading	Sub Grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	The primary aim is to tackle poverty and encourage wealth creation through delivering a green and inclusive economy through increased training and apprenticeship opportunities, thriving high streets and areas of other employment activity at the global, regional and local level.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	It seeks to increase the opportunities to get people into training and achieve their aspirations, assist local residents to remain financially independent and ensure they are equipped with the skills and knowledge needed to access the opportunities that living in Southwark brings.
IIAO 3	To improve the health of the population	✓✓	✓✓	Increasing opportunities for employment and other services will help to reduce the chance of mental health issues developing and/or continuing which can often be compounded by long-term unemployment.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Improving the local economy to be strong and resilient and provide the opportunity for employment will improve the opportunity for social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Through the implementation of a green new deal for Southwark, and contributing to the growth of the green economy, Southwark's residents will be able to take advantage of opportunities that the transition to a low carbon circular economy represents, including environmental innovation which will be required to tackle the challenges climate change presents for London.
IIAO 7	To improve the air quality	✓	✓	It seeks to improve the quality and offering of town and local centres. Promoting accessible goods and services in walkable neighbourhoods, and reducing the need to travel by car or public transport will have

				positive impacts on air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	Supporting a green economy includes reducing the amount of waste generated. The built environment is one of London's most wasteful sectors so to avoid waste and increase the reuse and recycling of resources is integral in the transition to a greener, more efficient economy. The opportunity for innovative new business models also paves the way for a transition to a greener, more circular economy.
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	By maintaining the vitality of local centres, the need to travel by car is minimised through promoting access to goods and services in walkable neighbourhoods.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P28 – Strategic protected industrial land				
IIA Objective	Description	Averaged Grading	Sub Grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	It will encourage the retention and growth of local employment in the locations and type of buildings for which London has an identified need and is currently being released at a faster rate than anticipated.
			✓✓	It will help to retain the diversity of the local economy.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Retention of industrial land in the SPIL will help provide the opportunity for training, apprenticeships and entry-level employment to local people be offered in sectors that may otherwise be displaced by other types of occupiers and land uses. The primary factor of businesses being located in the designated SPILs is for access to central London, therefore protecting these types of land uses in SPILs will prevent a skills shortage in this area of London with the highly competitively advantageous proximity to central London.
IIAO 3	To improve the health of the population	x	x	It will not necessarily promote sustainable forms of transport in the short term while electric vehicles are not common. The types of vehicles typically associated with the activities undertaken in areas of protected industrial land (such as SPIL) are normally heavily polluting, either through exhaust emissions or re-suspended particulates from tyre and break functions. The management of the impacts of these types of vehicles is required to be carefully managed through other policy measures and other council teams and partnership working with other stakeholders. As time goes on and technology for private vehicles becomes cleaner and distribution networks are reviewed and consolidated (both considered to be largely outside the remit of planning policy) the impact of the policy should be significantly

				less to be neutral by the end of the plan period.
			?	The activities undertaken and associated vehicle trips made as a result of the designation of industrial land has the potential to impact on local air quality which could impact on health.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	x	?	It is well established that crime and the fear and perception of crime is abetted by 'natural' or 'passive surveillance.' Designating areas for a particular group of land uses to the exclusion of others limits the amount of natural surveillance available to the area to deter crime and reduce the perception or fear of crime.
			x	Due to the nature of the activities and businesses that take place in protected industrial areas the public realm for the pedestrian is often not welcoming or even designed to accommodate them. This can add to the fear of crime and the potential for criminal activity to take place.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓	✓✓	While it is acknowledged that this policy may not create the most welcoming environment for pedestrians, it is considered to be outweighed by the significant benefit in terms of the diverse employment offer that the Southwark is able to accommodate, and which local people can take advantage of, and similarly the diverse service offer provided by employment sectors and businesses within protected industrial areas that will draw business to the borough. This will greatly aid social inclusion and community cohesion and diversity.
			?	Due to the nature of the built environment of protected industrial areas, it is not clear to the extent that the designation will help or hinder the connection of existing communities, the movement between them and the removal of physical barriers. Other policies in the plan will have to be carefully and thoughtfully applied to ensure this impact is offset and/or addressed due to it having a bearing on the

				level of social inclusion and community cohesion achievable.
<b>IIAO 6</b>	To reduce contributions to climate change	?	?	Due to the varied nature of activities and types of businesses that operate within protected industrial it is not clear what the extent to which the policy will impact, positively or negatively on contributions to climate change.
<b>IIAO 7</b>	To improve the air quality	x	x	Due to the types of activities and businesses that operate within protected industrial areas, including those which create and release dust and emissions particles, it is possible that air quality on these sites will not be as good as other parts of the borough off main roads. The types of vehicles used in and to get to and from these protected industrial areas are also often polluting from exhaust emissions and tyre and break particulates being re-suspended, impacting on air quality. This impact will have to be carefully managed by working with partners, other council teams and services and business operators in the industrial areas where required. This impact should improve as we progress through the plan period as engine technology and distribution networks are reviewed and improved.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓✓	✓✓	It designates industrial areas where industrial areas have previously been designed. Therefore, if there is anywhere where soils are likely to be contaminated, it is where the designated industrial land is and the designated industrial land in the New Southwark Plan will not cause any new contamination of soils.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	?	?	The primary purpose of industrial areas is functionality for producing or providing the goods and services the business is built on. This often comes at the expense of visual amenity and townscape

				considerations. Other policies in the plan will have to be thoughtfully implemented to offset this impact.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	?	?	The primary purpose of industrial areas is functionality for producing or providing the goods and services the business is built on. This often comes at the expense of visual amenity and townscape considerations. Other policies in the plan will have to be thoughtfully implemented to offset this impact.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	?	x	It is likely that the nature of the built environment (hard standing yards, large sheds and warehouses) and the environmental effects from the activities undertaken by the businesses on site (noise, dust, pollution etc.) will mean the designation limits biodiversity to be established in ways which do not apply to areas which are not designated as industrial land.
			✓	However, this policy will ensure that industrial uses are limited to areas in which they have historically been limited, and so the impacts of these areas are not going to be increased. Rather, due to the amount of protected industrial land being less than what it has been historically, the chance for biodiversity to flourish and habitat to be established in former areas of protected industrial land has increased.
<b>IIAO 14</b>	To reduce vulnerability to flooding	X	X	The occupiers of sites within protected industrial land are not considered to be among those most vulnerable to the impacts of flooding; however the designated industrial land is within an area of flood risk.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P29 - Office and business development				
IIA Objective	Description	Averaged Grading	Sub Grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	It will increase the job opportunities for all by requiring employment floorspace in the Central Activities Zone, town centres, opportunity areas or site allocations to be reprovided or increased. This will help to increase employment and reduce unemployment.
			✓✓	It will help diversify the economy by requiring the successful integration of different types of employment space with residential and other uses, including freight, logistics, light industry, co-working, maker-spaces and offices.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	It will seek to deliver an improved quality of housing in mixed-use developments by ensuring the successful integration of residential and non-residential uses is designed into a scheme. Good quality housing is a key factor in health and wellbeing.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	It will aid strong, cohesive communities by ensuring the relationship between the residential and non-residential uses within schemes is well designed, minimising the chance for conflict and promoting community cohesion. This will reduce the fear and perception of crime and stronger community bonds between residents and occupiers will reduce opportunities for crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	It will aid strong, cohesive communities by ensuring the relationship between the residential and non-residential uses within schemes is well designed, minimising the chance for conflict and promoting

				community cohesion.
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	It encourages well designed mixed-use development with the different uses well integrated. Mixed-use developments help contribute to walkable neighbourhoods, which in turn contribute to reducing the reliance on the private car. Reducing reliance on the private car will reduce contributions to climate change.
<b>IIAO 7</b>	To improve the air quality	✓	✓	It encourages well designed mixed-use development with the different uses well integrated. Mixed-use developments help contribute to walkable neighbourhoods, which in turn contribute to reducing the reliance on the private car. Reducing reliance on the private car will reduce contributions to pollutants which cause poor air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓	✓	It seeks to maintain the quality of soils by ensuring the priority for employment uses is located on land which has already been developed and host to employment uses.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	It seeks to maintain existing green spaces by ensuring the priority location for employment uses is on land which has already been developed and host to employment uses.
<b>IIAO 14</b>	To reduce vulnerability to flooding	X	X	The majority the Central Activities Zone, the borough's town centres, opportunity areas and site allocations are in a location at risk of flooding. Locating development in these areas will not necessarily reduce the developments or the

				surrounding occupiers to the risk of flooding.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will seek to deliver an improved quality of housing in mixed-use developments by ensuring the successful integration of residential and non-residential uses is designed into a scheme.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	It encourages well designed mixed-use development with the different uses well integrated. Mixed use developments help contribute to walkable neighbourhoods, which in turn contribute to reducing the reliance on the private car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

<b>P30 – Affordable workspace</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub Grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓	✓✓	It seeks to ensure there is a range of job opportunities, that the local economy is diverse and that the borough has a supply of the type of land and buildings required by a range of business which will help to provide employment and reduce unemployment.
			✓✓	The policy seeks to ensure that small businesses should be retained and reprovided for. This could impact local ethnic businesses which serve local 1 <sup>st</sup> , 2 <sup>nd</sup> and 3 <sup>rd</sup> generation migrant communities who statistically are significantly more likely to operate from such businesses.
			✓	Other policies in the Plan designate sites for employment use, encouraging the provision of jobs and require the provision of affordable workspace which should encourage people (particularly young

				people) in to jobs. This includes a policy amendment to Policy P28 requiring 10% affordable workspace in major developments delivering employment space to ensure it is delivered.
			✓✓	A vibrant and diverse economy will not only ensure a robust employment base but also help develop a resilient and sustainable economy, with the aim of reducing poverty
			✓✓	Small and independent businesses make up the majority of businesses of Southwark, which provide jobs for local people and opportunities for business start-ups and self-employment. The policy seeks to encourage mixed used developments, which evidence indicates, benefits start-up and growing small businesses and existing SMEs. Mixed use developments will be the means by which homes can be provided whilst promoting the growth of jobs and business.
			✓	The policy seeks to support local independent businesses and retailers which will deliver a broader and more diverse employment base; this will enable the maximisation of diversity and consumer choice to avoid risk of one-dimensional economy.
			✓✓	The policy seeks to encourage development which incorporates units that are flexible and designed to meet the needs of local businesses. It also seeks to encourage developers to ensure the physical layout of mixed use developments can support a range of commercial uses appropriate to the type of commercial use planned for or appropriate to that area.
			✓	Whilst the policy does not have the ability to ensure higher paid jobs are secured, this is likely to be delivered through the wider Council Plan, which encourages a London Living Wage as a minimum, so as to reduce poverty and create wealth for the residents who work in the community.

IIAO 2	To improve the education and skill of the population	✓	✓	It has the potential to improve the education and skill of the population by requiring specialist workspace providers to take on and manage employment floorspace where appropriate, which can often include incubator spaces and support services and where start ups and entrepreneurs collaborate, share ideas and learn from each other.
IIAO 3	To improve the health of the population	✓✓	✓✓	The requirement for the retention and reprovision of small business units, including providing for existing occupiers, has the potential to significantly and positively impact on mental health of business owners who's land or business unit could be subject to redevelopment.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	The requirement for full fit out of small business units mean they are much more likely to be let to and occupied by small businesses than if they were not fitted out. This means that the time in which the unit is vacant is likely to be significantly less. Vacant units can contribute to the fear and perception of crime and provide the opportunity for criminal activity due to the lack of 'natural' or 'passive' surveillance.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The requirement for full fit out of small business units mean they are much more likely to be let to and occupied by small businesses than if they were not fitted out. This means that the time in which the unit is vacant is likely to be significantly less. Vacant units can contribute to the fear and perception of crime and provide the opportunity for criminal activity due to the lack of 'natural' or 'passive' surveillance. This in turn could contribute to lessening social isolation and improved community cohesion.
			✓✓	The policy seeks to ensure that small businesses should be retained and reprovided for. This could impact local ethnic businesses which serve local 1 <sup>st</sup> , 2 <sup>nd</sup> and 3 <sup>rd</sup> generation migrant communities who statistically are significantly more likely to operate from such businesses in Southwark.

<b>IIAO 6</b>	To reduce contributions to climate change	N/A	N/A	
<b>IIAO 7</b>	To improve the air quality	N/A	N/A	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Requiring fit out for small units will increase the likelihood of the unit being occupied sooner, meaning the visual amenity impact of a vacant unit will be reduced.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	✓	Informally, small shops and businesses, which in Southwark statistically a much more likely to be operated by someone from a BME background, can form as community hubs for migrant and ethnic communities, which form a crucial part of their social infrastructure network.

<b>P31 – Small shops</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub Grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	The policy seeks to ensure that small shop units should be retained and reprovided for. This could impact local ethnic businesses which serve local 1 <sup>st</sup> , 2 <sup>nd</sup> and 3 <sup>rd</sup> generation migrant communities who statistically are significantly more likely to operate from such businesses.

<b>IIAO 2</b>	To improve the education and skill of the population	N/A	N/A	
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	The requirement for the retention and reprovision of small shop units, including providing for existing occupiers, has the potential to significantly and positively impact on mental health of business owners who's land or shop unit could be subject to redevelopment.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	N/A	N/A	
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The policy seeks to ensure that small businesses should be retained and reprovided for. This could impact local ethnic businesses which serve local 1 <sup>st</sup> , 2 <sup>nd</sup> and 3 <sup>rd</sup> generation migrant communities who statistically are significantly more likely to operate from such shops in Southwark.
<b>IIAO 6</b>	To reduce contributions to climate change	N/A	N/A	
<b>IIAO 7</b>	To improve the air quality	N/A	N/A	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport	N/A	N/A	

	and minimise the need to travel by car			
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	✓	Informally, small shops and businesses, which in Southwark statistically a much more likely to be operated by someone from a BME background, can form as community hubs for migrant and ethnic communities, which form a crucial part of their social infrastructure network.

<b>P32 – Business relocation</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged grading</b>	<b>Sub grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	N/A	N/A	
<b>IIAO 2</b>	To improve the education and skill of the population	N/A	N/A	
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	Its business relocation/reprovision requirement will have significant health and wellbeing benefits for the owners and employees of local business on sites which are subject to redevelopment proposals. This policy requirement should go to great lengths to improve the mental and emotional well being and reduce stress and social exclusion for those concerned to ensure that businesses can be accommodated if not in the new development then in a location nearby.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	N/A	N/A	
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The business relocation/reprovision requirement hinges on promoting community cohesion, social inclusion, equality and diversity for business owners and employees on sites which may be subject to redevelopment. The policy focusses on small or independent businesses which, in Southwark, are often owned by and employ people from BME backgrounds. Therefore this policy could positively impact those groups disproportionately.
<b>IIAO 6</b>	To reduce contributions to climate change	N/A	N/A	
<b>IIAO 7</b>	To improve the air quality	N/A	N/A	

<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

<b>P33 – Railway arches</b>				
<b>IIA Objective</b>	<b>Description</b>	<b>Averaged Grading</b>	<b>Sub Grading</b>	<b>Commentary</b>
<b>IIAO 1</b>	To tackle poverty and encourage wealth creation	✓✓	✓✓	It has the potential to improve the range of job opportunities and diversify the local economy as the Low Line walking route provides new customers and footfall to prompt new, public facing business to open in the arches. Meanwhile the suitability of the arches for industrial uses means that these can still be accommodated. This mix will help tackle poverty and encourage wealth creation.
<b>IIAO 2</b>	To improve the education and skill of the	N/A	N/A	

	population			
<b>IIAO 3</b>	To improve the health of the population	✓✓	✓✓	It seeks to enable to implementation of the Low Line walking route which will help connect previously severed communities by the viaducts. This has the potential to have significant benefits for physical and mental health, as neighbourhood become more walkable opening up the opportunities to access services in different town centres. It will also promote walking which is a health, active way to travel.
<b>IIAO 4</b>	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Enabling the Low Line walking route and promoting a mix of uses, including uses which operate in the evening and have active frontages will help to reduce the perception of crime and the opportunity for crime as more people drawn to the uses in the arches provide passive surveillance.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	It seeks to enable to implementation of the Low Line walking route which will help connect previously severed communities by the viaducts. This has the potential to have significant benefits for social inclusion, equalities, diversity and community cohesion.
<b>IIAO 6</b>	To reduce contributions to climate change	✓	✓	The opportunity to provide non-industrial uses in the railway arches, as well a enabling the low line walking route, may help reduce contributions to climate change as people decide to walk rather than travel by public transport or private cars between neighbourhoods.
<b>IIAO 7</b>	To improve the air quality	✓	✓	The opportunity to provide non-industrial uses in the railway arches, as well a enabling the low line walking route, may help improve local air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	Railways arches have so far been primarily seen as 1) a barrier between communities and 2) as a suitable location for small industrial premises. While this may still be an appropriate assessment, P27 seeks to open up the opportunity to re-assess these underutilised resources by re-using and re-cycling this part of the historic built environment for the wider

				communities benefit, including other types of uses and enabling the Low Line walking route.
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓	✓	Railway arches have typically been occupied by industrial uses which may have contaminated soils. The opportunity for these arches to be developed for publically accessible uses, as well as enabling the delivery of the Low Line walking route, presents the opportunity for remediation and de-contamination to be undertaken where required.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It seeks to improve the landscape/townscape by providing the opportunity for uses with active frontages to be incorporate into railway arches, as well as enabling the delivery of the Low Line walking route.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Railway viaducts and arches in Southwark are among the oldest in the world and contribute significantly to the character and boundaries of the borough's neighbourhoods. They are currently heavily underutilised both as routes through and with activities within/along, and have the potential to become cultural and heritage attractions within themselves, as well as hosting a range of affordable employment uses for both public facing and private businesses.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	Development does not impede on the implementation of the Low Line walking route which can be considered a piece of green infrastructure in parts.
<b>IIAO 14</b>	To reduce vulnerability to flooding	X	X	The occupiers of railway arches in the use classes specified in P27, while the majority of them are within areas of flood risk, are not considered to be those most vulnerable to flooding. The risk however is still present and must be assessed on a site by site basis however.
<b>IIAO 15</b>	To provide everyone with the opportunity to	✓✓	✓✓	Residential land uses are not permitted in railway

	live in a decent home			arches. This is because they do not provide a good quality of accommodation and therefore would be contrary to the objective of providing 'everyone with the opportunity to live in a decent home.'
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	It seeks to promote Low Line walking routes which will encourage walking and cycling, connect neighbourhoods to each other by walking routes and reduce the need to take trips in cars.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	✓	It allows for the delivery of D use classes which may include various types of social infrastructure and requires that development does not impede on the implementation of the Low Line walking route which can be considered a piece of green infrastructure in parts.

P34 – Town and local centres				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	Concentrating town centre uses in town centres provides the opportunities for the benefits of agglomeration to become manifest, as more business choose to locate to be near and compete with other business, whether retail or otherwise. This means a town-centre first policy for town centre uses will promote employment activity, increasing employment, reducing unemployment and helping to reduce poverty and encourage wealth creation.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Town centres host civic and community hubs in walkable, sociable neighbourhoods. The concentration of such uses, as well as A uses (such as retail, cafes, and pubs) will help increase the opportunities for social interaction, significantly reducing opportunities for social isolation which will benefit mental and emotional health. Encouraging concentration in walkable neighbourhood town centres will encourage active travel to access goods and services which will benefit physical health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Concentrating town centre uses in established town centres will increase activity and natural surveillance and reduce the fear and perception of crime and the opportunity for criminal activity.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Town centres host civic and community hubs in walkable, sociable neighbourhoods. The concentration of such uses, as well as A uses (such as retail, cafes, and pubs) will help increase the opportunities for social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Focussing town centre uses within established town centres will promote accessible goods and services in walkable neighbourhood and reduce the need to travel by car or public transport. This will have positive impacts on carbon emissions and reduce our contribution to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	Focussing town centre uses within established town centres will

				promote accessible goods and services in walkable neighbourhood and reduce the need to travel by car or public transport. This will have positive impacts on air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓	✓	It seeks to maintain the quality of soils by ensuring the priority for town centre uses is located on land which has already been developed and host to town centre uses in established and emerging town centres.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Southwark's town centres have a rich history provided by the historic buildings which add to their character and visual amenity. this policy requires that development does not harm the amenity or character of the area.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Southwark's town centres have a rich history and feature many buildings and spaces of cultural and historic significance. Focussing town centre uses in town centres will provide the opportunity for these assets to be appreciated and used by more people than if town centre uses were not concentrated in town centres.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	X	X	The majority of Southwark's town centres are located in areas at risk of flooding. However most of the types of users are not considered to be the most vulnerable to the impacts of flooding compared with occupiers of other types of land uses. However, the risk is still present and must be assessed on a site by site basis.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Town centres promote the agglomeration of particular uses in the space location, minimising the need to travel by car and promoting access to goods and services in walkable neighbourhoods.
<b>IIAO 17</b>	To provide the necessary	✓✓	✓✓	It allows for the provision of cultural and civic uses which can

	infrastructure to support existing and future development			provide a number of social infrastructure functions. The policy also seeks to provide public toilets, seating and drinking fountains.
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P35 – Development outside town centres				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	Development of town centre uses outside town centres will help to provide employment and so reduce poverty and encourage wealth creation. However, the impact of this should not be to the detriment of the established town centres identified in P34.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	?	?	Development of town centre uses outside town centres has the potential to disrupt the benefits of agglomeration that P34 seeks to encourage, including goods and services accessible in walkable neighbourhoods and a network of informal and formal social and civic infrastructure that many residents rely on. Disruption of these benefits could have physical, mental and emotional health impacts for residents and workers. This is why development of the nature prescribed in this policy must provide an impact assessment.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	Development of town centre uses outside town centres has the potential to reduce the fear of crime and opportunity for criminal activity by increasing natural surveillance and general activity in an area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	?	?	Development of town centre uses outside town centres has the potential to disrupt the benefits of agglomeration that P34 seeks to encourage, including goods and services accessible in walkable neighbourhoods and a network of informal and formal social and civic infrastructure that many residents rely on. Disruption of these benefits could have impacts on social inclusion and community cohesion for residents and workers.

				This is why development of the nature prescribed in this policy must be subject to an impact assessment.
<b>IIAO 6</b>	To reduce contributions to climate change	?	?	Development of town centre uses outside town centres has the potential to disrupt the benefits of agglomeration that P34 seeks to encourage, including goods and services accessible in walkable neighbourhoods, and may instead promote travel by car, due to the lower public transport accessibility levels (PTAL) found outside town centre locations. This is why development of the nature prescribed in this policy must be subject to an impact assessment.
<b>IIAO 7</b>	To improve the air quality	?	?	Development of town centre uses outside town centres has the potential to disrupt the benefits of agglomeration that P34 seeks to encourage, including goods and services accessible in walkable neighbourhoods, and may instead promote travel by car, due to the lower public transport accessibility levels (PTAL) found outside town centre locations. This could have impacts on air quality. This is why development of the nature prescribed in this policy must be subject to an impact assessment.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	X	X	The majority of Southwark is subject to some form of flood risk, including locations outside of town centres identified in P34.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	?	?	Development of town centre uses outside town centres has the potential to disrupt the benefits of agglomeration that P34 seeks

				to encourage, including goods and services accessible in walkable neighbourhoods, and may instead promote travel by car, due to the lower public transport accessibility levels (PTAL) found outside town centre locations. This is why development of the nature prescribed in this policy must be subject to an impact assessment.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	?	?	Development of town centre uses outside town centres has the potential to disrupt the benefits of agglomeration that P34 seeks to encourage, including goods and services accessible in walkable neighbourhoods and a network of informal and formal social and civic infrastructure that many residents rely on. This is why development of the nature prescribed in this policy must provide an impact assessment.

P36 – Protected shopping frontages				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	It seeks to retain active ground floor uses in protected shopping frontages which will contribute to retaining employment in the local area which will ensure unemployment is reduced and wealth creation is encouraged.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓	✓	It seeks to retain active ground floor uses in protected shopping frontages which will contribute to retaining informal social infrastructure greatly valued by a variety of local communities. This will have positive impacts on mental and emotional health and wellbeing.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	It seeks to retain active ground floor uses in protected shopping frontages which will retain activity and natural surveillance in these locations and reduce the fear and perception of crime and the opportunity for criminal activity.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	It seeks to retain active ground floor uses in protected shopping frontages which will help maintain the opportunities for social interaction and community making, in turn improving social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	✓	✓	It seeks to retain active ground floor uses in protected shopping frontages which will promote provision of accessible goods and services in walkable neighbourhood and reduce the need to travel by car or public transport. This will have positive impacts on carbon emissions and reduce our contribution to climate change.
IIAO 7	To improve the air quality	✓	✓	It seeks to retain active ground floor uses in protected shopping frontages which will promote provision of accessible goods and services in walkable neighbourhood and reduce the need to travel by car or public transport. This will have positive impacts on air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of	N/A	N/A	

	land and soils			
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	It seeks to retain active ground floor uses in protected shopping frontages which will promote provision of accessible goods and services in walkable neighbourhood and reduce the need to travel by car or public transport.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	✓	It seeks to retain active ground floor uses in protected shopping frontages which will contribute to retaining informal social infrastructure greatly valued by a variety of local communities.

**P37 – Shops outside protected shopping frontages, town and local centres**

IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	It seeks to retain active ground floor uses outside protected shopping frontages and town and local centres which will contribute to retaining employment in the local area which will ensure unemployment is reduced and wealth creation is encouraged.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓	✓	It seeks to retain active ground floor uses outside protected shopping frontages and town and local centres which will contribute to retaining informal social infrastructure greatly valued by a variety of local communities. This will have positive impacts on mental and emotional health and wellbeing.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	It seeks to retain active ground floor uses outside protected shopping frontages and town and local centres which will retain activity and natural surveillance in these locations and reduce the fear and perception of crime and the opportunity for criminal activity.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	It seeks to retain active ground floor uses outside protected shopping frontages and town and local centres which will help maintain the opportunities for social inclusion and community cohesion in these locations.
IIAO 6	To reduce contributions to climate change	✓	✓	It seeks to retain active ground floor uses outside protected shopping frontages and town and local centres which will promote provision of accessible goods and services in walkable neighbourhood and reduce the need to travel by car or public transport. This will have positive impacts on carbon emissions and reduce our contribution to climate change.
IIAO 7	To improve the air quality	✓	✓	It seeks to retain active ground floor uses outside protected shopping frontages and town and local centres which will promote provision of accessible goods and services in walkable neighbourhood and reduce the need to travel by car or public transport. This will have positive impacts on air quality.

<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource			
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	It seeks to retain active ground floor uses outside protected shopping frontages and town and local centres which will promote provision of accessible goods and services in walkable neighbourhood and reduce the need to travel by car or public transport.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	✓	It seeks to retain active ground floor uses outside protected shopping frontages and town and local centres which will contribute to retaining informal social infrastructure greatly valued by a variety of local communities.

**P38 – Shop fronts**

IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	It seeks to encourage appropriate treatment of historic shops fronts and for shops to have appropriate designs relative to their context. Ensuring shop fronts fit within their context will help to make attractive places which can promote investment, in turn generating jobs, reducing poverty and encouraging wealth creation.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	N/A	N/A	
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	It seeks to encourage internal rather than external security grilles. This allows for shop displays to be prominent during times when the shop is not open and when there may be less people around. External security grilles, by contrast, are often blank facades that do not contribute a welcoming atmosphere to the townscape. Use of internal security grilles will make for a more inviting and attractive townscape and reduce the fear of crime and perception of opportunity for crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	It seeks to encourage appropriate treatment of shops fronts and for shops to have appropriate designs relative to their context. Ensuring shop fronts fit within their context will help to make attractive places which can promote community cohesion and social inclusion.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	

<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓	✓	It seeks to encourage appropriate treatment of shop fronts and for shops to have appropriate designs relative to their context. Ensuring shop fronts fit within their context will help to protect and enhance the quality of townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	It seeks to encourage appropriate treatment of historic shops fronts and for shops to have appropriate designs relative to their context. Ensuring shop fronts fit within their context will help to conserve and enhance heritage assets such as shop fronts and their wider context including conversation areas or siting within the vicinity of a significant heritage asset, such as a listed building or world heritage site.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

**P39 – Betting shops, pawnbrokers and payday loan shops**

IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Betting shops, pawnbrokers and payday loan shops can significantly and disproportionately harm people in poverty, lower incomes and stifle wealth creation. Limiting the amount of these premises will help to combat and reverse these impacts to relieve poverty and encourage wealth creation.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Betting shops, pawnbrokers and payday loan shops can significantly and disproportionately impact, and even financially harm, people in poverty, on lower incomes. This harm can create or exacerbate mental and emotional health issues which can then impact on existing or cause physical health issues. Limiting the amount of these premises will help to combat and reverse these impacts to promote and encourage good mental, emotional and physical health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	Over clustering of Betting shops, pawnbrokers and payday loan shops on the street will deteriorate the vitality and vibrancy of the town centre, which in turns lower the effectiveness of natural surveillance and increase the perception of crime in the area.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Betting shops, pawnbrokers and payday loan shops can significantly and disproportionately impact, and even financially harm, people in poverty and on lower incomes. This harm can create or exacerbate mental and emotional health issues which can then impact on existing or cause new physical health issues and affect community cohesion and social inclusion. Limiting the amount of these premises will help to combat and reverse these impacts to promote and encourage social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	

<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P40 – Hotels and other visitor accommodation				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Hotels and other visitor accommodation provide employment uses while also encouraging indirect employment from the spending of visitors in the neighbourhood and the borough. This helps to reduce unemployment and encourages wealth creation. This policy requires that hotels incorporate a range of day-time uses as well as the accommodation which supports employment opportunities.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	N/A	N/A	
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Hotels are often hubs for activity, which means there are often people, both employed by and staying at the hotel, who provide natural surveillance. This reduces the fear of crime and the prevents opportunity to carry out criminal activity unnoticed.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	This policy requires hotels to include day-time uses which can be used by the local community. Where the development of hotels has previously caused tension in the community, provision of such facilities should help promote social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	It requires that new hotels and visitor accommodation will be permitted, provided that it does not harm the character (including the townscape and landscape) of the local area.
IIAO 12	To conserve and enhance the historic	ü	✓	It requires that new hotels and visitor accommodation will

	environment and cultural assets			be permitted provided that it dos not harm the character (including historic and cultural assets) of the local area.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	✓	It requires hotels to include day time uses which can be used by the local community which could include some form of informal or formal social infrastructure.

P41 – Pubs				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	Protecting pubs and their unique features will provide the types of business premises and floorspace that publicans and landlords require. Pubs can also be attractions for tourist and visitors. This will help diversify the economy ensuring these types of jobs are available, help provide employment and encourage wealth creation.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Pubs make a recognised contribution to the network of social infrastructure for local communities, which provide spaces for interaction and foster social inclusion and community cohesion. This has significant benefits for mental and emotional health and wellbeing.
IIAO 4	To reduce the incidence of crime and the fear of crime	?	?	Pubs help to contribute to evening activity in a place which can reduce the fear of crime and opportunities for criminal activity to go unnoticed. However it is acknowledged that there is generally a higher crime rate in areas with significant concentrations of evening and night time activity, including drinking establishments such as pubs. Therefore such establishments and the surrounding neighbourhoods will have to continue to be carefully managed to minimise the fear of and opportunity for crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Pubs make a recognised contribution to the network of social infrastructure for local communities, which provide spaces for interaction and foster social inclusion and community cohesion. This policy also allows for the status of an “asset of community value” to be treated as a material consideration on any planning applications on pubs with that designation. This empowers local communities to have their views taken seriously in the determination of planning applications on pubs which will promote social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	

<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It seeks to ensure that any development in relation to pubs retains the design, character and heritage value of the pub where it makes a positive contribution to the streetscape and local character.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	It seeks to ensure that any development in relation to pubs retains the design, character and heritage value of the pub where it makes a positive contribution to the streetscape and local character.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to retain public houses as the important component of social infrastructure networks that they are, providing spaces for social interaction and inclusion.

P42 – Outdoors advertisements and signage				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	N/A	N/A	
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	It requires that outdoor advertisements and signage encourage healthy behaviours which will in turn promote community cohesion.
IIAO 6	To reduce contributions to climate change	✓	✓	The use of low energy will play an important role in reducing contributions to climate change.
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It requires that signage and advertisements not adversely affect the significance of the streetscape or their settings
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	It requires that signage and advertisements not adversely affect the significance of heritage assets or their settings
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	It requires that signage and advertisements not adversely affect trees in close proximity to the site.
IIAO 14	To reduce vulnerability to flooding	N/A	N/A	
IIAO 15	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
IIAO 16	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
IIAO 17	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

**P43 – Broadband and Digital Infrastructure**

IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	It requires high-speed broadband to be implemented and supplied in new development and their surrounding premises. This will provide the opportunity for businesses to compete with other areas of London and the UK which have access to high-speed broadband, compared against which it currently falls behind. This will help increase the attractiveness of Southwark as a place to do business, in turn increasing opportunities for employment and reduce unemployment which will help tackle poverty and encourage wealth creation.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	It requires that standards be met for digital infrastructure which conforms to health and safety standards.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	It requires that major development connect existing nearby premises up to high-speed broadband networks where the area has a broadband deficiency. This will help to ensure everyone is able to take advantage of the benefits offered by online services, improving social inclusion, equality and community cohesion.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It requires that digital infrastructure equipment avoids harmful impacts on public amenity and unacceptable street

				clutter in the public realm.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	It requires that that digital infrastructure equipment does not adversely affect the significance of heritage assets or their settings.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	The installation of high-speed broadband networks will contribute to delivering a key piece of important digital infrastructure allowing technological resilience for both new and existing residents and business premises. This policy will particularly impact areas of Southwark which have been lagging behind in their broadband network coverage and speeds, improving overall infrastructure and quality of life.

**Integrated impact assessment for**

**Strategic Policy 5 Healthy active lives**

Including

P44: Healthy developments

P45: Leisure, arts and culture

P46: Community uses

P47: Hot food takeaways

P48: Public transport

P49: Highways impacts

P50: Walking

P51: Low Line routes

P52: Cycling

P53: Car parking

P54: Parking standards for disabled people and the physically impaired

	SP5	P44	P45	P46	P47	P48	P49	P50	P51	P52	P51	P53	P54
IIAO 1	✓✓	✓✓	✓✓	✓	✓	✓	N/A	✓✓	✓✓	✓✓	✓✓	N/A	N/A
IIAO 2	N/A	N/A	✓	✓	N/A								
IIAO 3	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓
IIAO 4	✓	N/A	✓	N/A	N/A	N/A	✓	✓	✓	✓	✓	✓✓	N/A
IIAO 5	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	N/A	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 6	✓✓	N/A	N/A	N/A	N/A	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 7	✓✓	N/A	N/A	N/A	N/A	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓
IIAO 8	✓✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 10	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 11	N/A	N/A	✓✓	N/A	N/A	N/A	✓✓	✓✓	✓✓	N/A	N/A	✓✓	✓✓
IIAO 12	N/A	N/A	✓✓	N/A	N/A	N/A	N/A	✓✓	✓	N/A	N/A	N/A	N/A
IIAO 13	✓✓	N/A	N/A	N/A	N/A	N/A	N/A	✓✓	✓	N/A	N/A	N/A	N/A
IIAO 14	N/A	N/A	x	N/A									
IIAO 15	✓✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 16	✓✓	N/A	N/A	N/A	N/A	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓
IIAO 17	✓✓	✓✓	N/A	✓✓	N/A	N/A	✓✓	✓✓	✓✓	✓✓	✓✓	?	N/A
Avg.	95%	100%	69%	80%	83%	83%	93%	86%	79%	94%	94%	93%	83%

**SP5 – Thriving neighbourhoods and tackling Health Inequalities**

IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	One of the measures of poverty and deprivation is physical and mental health as well as the condition of a community's housing and neighbourhood. Some of the neighbourhoods in Southwark have high levels of deprivation and poverty. Providing more community health facilities, enabling voluntary organisations to take root, providing healthy food options, improving green spaces and improving housing conditions as prescribed in SP5 will help tackle this.
			✓✓	It will promote walking and cycling through the delivery of walking and cycling routes and good urban design that prioritises pedestrians and cyclists. This will improve access to low cost transport opportunities and contribute to tackling poverty.
IIAO 2	To improve the education and skill of the population	N/A	N/A	It seeks to extend opportunities to maintain and improve health and well being, as well as building resilient communities and enabling vulnerable residents to lead and enjoy independent lives. This will require educating and upskilling the groups concerned, including those with specialist care or educational needs or disabilities.
IIAO 3	To improve the health of the population	✓✓	✓✓	It seeks to improve the health of the population by improving housing conditions, a key factor in physical and mental health and providing active travel opportunities and routes for walking and cycling and improving green spaces. This will increase the attractiveness of staying active for recreation and travel which in turn will have significant benefits on physical and mental health and wellbeing.
			✓✓	It seeks to improve access to healthcare, voluntary organisations and community health facilities which will have significant benefits for physical and mental health and wellbeing of the population.
			✓✓	It seeks to tackle health inequalities by improving the economic wellbeing, physical and mental health of our communities through the various measures and aims as set out in this strategic policy..
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓✓	It seeks to build resilient communities which can help to reduce the fear of crime. The policy also seeks to improve green spaces, which will make them more attractive to use and reduce the fear of crime and opportunity for criminal activity to go unnoticed. There is the risk that encouraging vulnerable people to lead independent lives could increase the opportunity for them to be exploited by crime so this will

				have to be carefully managed with the appropriate safeguards put in place by the council's partners and stakeholders.
			✓	It will help to reduce crime and the fear of crime through encouraging walking and cycling and leading healthy active lives in general, Southwark's population will feel safer from traffic, pollution and the dangers of poverty and deprivation. The promotion of walking and cycling through urban design that means wayfinding will become easier. This will mean more people on the street and more "natural surveillance" and so a reduced fear of crime.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	It seeks to build resilient communities and enable vulnerable residents to have the opportunity to lead independent lives. This combined with improved access to health facilities and health care and voluntary organisations and community facilities prescribed in SP5 will help to reduce social isolation and improve community cohesion.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	It seeks to encourage active travel by sustainable forms of transport such as walking and cycling. This will reduce the demand for transport by carbon-emission intensive means such as the private car and, to a lesser extent, public transport. This will result in a decrease in carbon emissions from transport in the borough.
			✓✓	It seeks to ensure all council homes are warm, dry and safe. This is often done through new insulated cladding on older housing blocks which increase the energy efficiency of the building and in turn reducing carbon emissions.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	It seeks to encourage active travel by sustainable forms of transport such as walking and cycling. This will reduce the demand for transport by other means which emit pollutants such as NOx and particulate matters such as the private car and, to a lesser extent, public transport. Car parking will also be more closely controlled, reducing the use of cars by both borough residents and visitors. The quality of air in the borough will improve as a result which will have public health benefits.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	It seeks to ensure all council homes are warm, dry and safe, encouraging refurbishment (recycling) of existing housing rather than demolition and new-build, which is more resource intensive and, where other sustainability considerations do not outweigh this option, less environmentally friendly and waste efficient.
<b>IIAO 9</b>	To encourage sustainable use of water	N/A	N/A	

	resources			
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	It seeks to improve existing green spaces which will make them more attractive for biodiversity and as habitat.
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It seeks to ensure all council homes are warm, dry and safe which will positively impact on the quality of housing for significant number of residents in the borough and ensure that, where they currently do not, they are provided with the opportunity to live in a decent home.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	It seeks to encourage active travel by sustainable forms of transport such as walking and cycling. This will reduce the demand for transport by other means such as the private car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to improve existing green spaces which will help to deliver enough green infrastructure required by existing and future development.

P44 – Healthy developments				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Health is a key determining factor in poverty. Improving health will make opportunities for employment and wealth creation much more likely. This policy seeks to ensure health of residents and workers is prioritised in the borough by providing developments that support and deliver healthy activities and other health, leisure related community facilities. This will help reduce poverty, including those groups most impacted by ill health, children and the elderly.
IIAO 2	To improve the education and skill of the population	N/A		
IIAO 3	To improve the health of the population	✓✓	✓✓	It seeks to improve the health of the population by providing developments that support and deliver healthy activities and other health, leisure related community facilities. The policy is consistent with national policy in its aim to retain or re-provide existing health, community, sports and leisure facilities.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	It seeks to improve the health of the population by providing developments that support and deliver healthy activities and other health, leisure related community facilities for people to meet up and to support vulnerable people. This will have a significant and positive effect on social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	✓	✓	Its seeks to encourage active transport modes to developments, helping establish a modal shift away from private motor cars, which contribute to the release of considerably more NOx and particulate matter pollutants per person travelling than public transport relative to capacity. These pollutants are the main contributors to poor air quality and so this policy will help to reduce this impact and improve air quality
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	

<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to provide development that supports and delivers healthy activities and other health, leisure related community facilities which can comprise important forms of social infrastructure for the borough's resident and working population.

P45 – Leisure, arts and culture				
I/A Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	It will improve the range of job opportunities for local people by enabling employment in the leisure, arts and cultural sectors. The fact box provides the most up to date Use Class Order (September 2020) providing clarity to the public on the different use classes.
			✓✓	The greater the amount of leisure, arts and cultural facilities in the borough the greater the opportunity for training and employment. This has significant potential in some of our more deprived communities where the creative economy is currently growing.
IIAO 2	To improve the education and skill of the population	✓	✓	Arts and cultural institutions and organisations are often able to offer and manage training and workshops for local people.
IIAO 3	To improve the health of the population	✓✓	✓✓	It has the potential to improve mental and emotional health and wellbeing through increased access to arts, leisure and cultural facilities which can enhance wellbeing and provide training and employment opportunities, which can also improve health. This is particularly relevant in some of Southwark's more deprived communities where a cultural and arts scene is continuing to grow.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	Arts, cultural and leisure uses can contribute to street activity, and so natural surveillance, by being part of the day time, evening and night time economy. This will improve safety and security as more people are active on the street.
			✓	Community facilities that are multipurpose and shared spaces will mean people using the buildings more than if they were for a single use or not shared. This will increase the number of people using the space at different times of the day and so provide a sense of activity, security and natural surveillance.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Arts and cultural institutions and organisations are sometimes voluntary or community-based. This policy will help to support such organisations and will help reduce social isolation, inequality and promote diversity and community cohesion.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or	N/A	N/A	

	recycle waste arising as a resource			
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It seeks to encourage public art projects which have the potential to improve the relationship between buildings and streets and other types of urban spaces that contribute to townscape character.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Southwark is London's most historic borough. Therefore there is a high possibility that the arts, leisure and cultural provision may focus on history and heritage, promoting a better understanding of the borough's historic environment.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	x	x	It specifies that development within the Strategic Cultural Area and Elephant and Castle Opportunity Area should investigate the feasibility of providing cultural venues of strategic significance. These areas are within flood risk zones. Flood risk for any such facilities and uses should be carefully evaluated, particularly where large numbers of people will congregate in basement levels as is sometimes typical for such large scale arts, cultural and leisure facilities in central London.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P46 – Community uses				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	Community facilities can provide spaces for training, education and learning which will help reduce unemployment and so tackle poverty and encourage wealth creation.
IIAO 2	To improve the education and skill of the population	✓	✓	Community facilities can provide spaces for training, education and learning which will help reduce unemployment and so tackle poverty and encourage wealth creation.
IIAO 3	To improve the health of the population	✓✓	✓✓	Community facilities can provide spaces for social interaction, relaxation and recreation and classes for training, education and learning. All these things can improve mental and emotional and by extension physical health and wellbeing.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Community facilities can provide spaces for social interaction, relaxation and recreation and classes for training, education and learning. All these things can reduce social isolation and promote equality and diversity between and within different groups and aid community cohesion. This will be particularly important for groups such as those from deprived areas, which have a higher proportion of residents from a BME background, children and older people, where loneliness, due to a lack of services and facilities such as community space, can affect health.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	N/A	N/A	
IIAO 12	To conserve and enhance the historic	N/A	N/A	

	environment and cultural assets			
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to provide community facilities which form a key piece of social infrastructure for many of the borough's residents.

P47 – Hot food takeaways				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	One of the markers of poverty is physical health, which is partially determined by a healthy diet. This policy seeks to limit the proliferation, and so health impact of hot food takeaways, which will improve health and so reduce poverty.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Part of healthy living includes a healthy diet. The majority of hot food takeaways sell food cooked in oil and high in fat. Limiting hot food takeaways will offer the opportunity to improve the diets and overall health, particularly of young people. A healthy diet is proven to contribute to positive mental health, which this policy seeks to encourage by limiting hot food takeaways.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	It seeks to target, among other groups, young people at primary and secondary schools who have access to and frequent hot food takeaways during lunch and after the end of the school day. This is because diet is proven to effect concentration and school attainment, and the majority of hot food takeaways supply unhealthy food which should be limited in consumption. Therefore, this policy seeks to impact young people disproportionately, however this impact is considered to be positive and for the benefit of young people and the wider community.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of	N/A	N/A	

	landscape and townscape			
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P48 – Public transport				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	Adequate public transport capacity will enable local, national and international visitors to access the borough's tourist and cultural sites and for people to access employment in these sectors by public transport.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓	✓	Adequate public transport capacity will enable access to health and social facilities and for people to access employment in these sectors by public transport.
			✓	Better public transport will help people access friends and family, support networks and health facilities, improving mental health and reducing the chance of social exclusion.
			✓	Public transport is still largely polluting, however over time this will likely change, as Southwark currently has one hydrogen bus route. Furthermore, public transport is considerably less polluting than private motor vehicles where the energy and fuel required to transport the same number of people is significantly greater. In this respect, this policy promotes non-polluting forms of transport and its implementation will have a positive effect on environmental health. Furthermore, good public transport services will make it more attractive for people to use, helping establish the modal shift away from private motor cars, which contribute significantly to congestion and poor air pollution and so ill health.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Promoting public transport will increase the accessibility for people with mobility issues, such as the elderly and disabled. This will promote social inclusion and community cohesion.
			✓✓	Adequate public transport capacity will enable affordable access to health and social facilities and for people to access employment in these sectors by public transport. It will also allow people to access friends and family and support networks. Access to these things will significantly reduce the risk of social isolation and promote social inclusion and community cohesion. Elderly and disabled groups will

				benefit from good public transport.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	Good public transport services will make it more attractive for people to use, helping establish the modal shift away from private motor cars, which contribute CO <sup>2</sup> and greenhouse gas emissions considerably more than public transport relative to capacity and so help to reduce contributions to climate change.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Good public transport services will make it more attractive for people to use, helping establish the modal shift away from private motor cars, which contribute to the release of considerably more NO <sub>x</sub> and particulate matter pollutants per person travelling than public transport relative to capacity. These pollutants are the main contributors to poor air quality and so this policy will help to reduce this impact and improve air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Its key aim is to promote sustainable travel and minimise car use.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P49 – Highways impacts				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	It requires that development minimises the demand for private car trips. This would have the secondary benefit of making walking and cycling more attractive options for personal transport, which are healthier ways to move around than private cars.
			✓✓	It seeks to minimise private motor vehicle use, which contribute to congestion and poor air quality. This means that air quality will be improved which will have a positive benefit for local people's health and well being.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	It seeks to minimise demand for private car journeys and private motor vehicle trips servicing the development. Minimising these trips will reduce the impact of pollution, congestion and dead spaces created by parked vehicles, improving the public realm and reducing the fear of crime and perception of crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	N/A	N/A	
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	It seeks to minimise demand for private car journeys and private motor vehicle trips servicing the development. Diesel- and petrol-powered vehicles produce carbon emissions. Minimising use of these types of vehicles by providing alternative, sustainable transport options will reduce carbon emissions and the contribution to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	It seeks to minimise demand for private car journeys and private motor vehicle trips servicing the development, which contribute to poor air quality. Minimising these types of journeys will reduce contribution to poor air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of	N/A	N/A	

	land and soils			
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It seeks to ensure servicing and delivery arrangements can minimise their impact on the safe and efficient use of the public realm by other users.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	It requires development to minimise the demand for car journeys
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to provide efficient and appropriate servicing and delivery arrangements in development which can in turn maximise the efficient use of existing and future infrastructure.

P50 – Walking				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Health is a key determining factor in poverty and walking promotes physical health. Promoting walking will enable new and better routes to services and facilities between communities, including deprived communities.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	It will help encourage walking which is a healthy way to move around and opening up improving walking routes will enable new routes to services and facilities between communities, health and social care facilities.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	Improving existing and creating new walking routes will encourage more people to walk, improving street vitality and providing more natural surveillance
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	It specifies that new and improved walking routes will improve access for all, particularly for the elderly and others with mobility issues.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	It will encourage walking which will reduce demand for private vehicle trips and public transport. This will in turn reduce contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	It will encourage walking which will reduce demand for private vehicle trips and public transport. This will in turn reduce air pollution. Walking is an important way to reduce emissions from motorised transport.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Walking is one of the best ways to appreciate and move around the city. Promoting walking will ensure urban design and architecture takes this into account.

<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	More and better walking will increase access to historic and cultural destinations in the borough.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	More and better walking routes along and through the borough will increase access to green space which has previously been less accessible because of a lack of walking routes.
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	It encourages walking and seeks to make walking an attractive way of getting around. This is a form of sustainable travel and the policy will help minimise the need to travel by car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to ensure strategic and local walking infrastructure is supported and delivered.

P51 – Low Line routes				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Opening up low line walking routes will enable new routes to services and facilities, thus opportunities, between communities including deprived communities which will help to reduce poverty.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Low line walking routes will help encourage walking which is a healthy way to move around. It will also enable new routes to services and facilities between communities, health and social care facilities.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	Currently, the accessible routes along arches are generally not well used meaning there is a lack of activity and natural surveillance. The low line walking routes will help to address this as a secondary benefit of the policy proposal.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	The low line walking routes will improve access for all, including the elderly and others with mobility issues. This will help reduce social isolation, promote equality and community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	It will encourage walking which will reduce demand for private vehicle trips and public transport. This will in turn reduce contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	It will encourage walking which will reduce demand for private vehicle trips and public transport. Low Line Routes encourage walking over the use of private vehicles which reduce emissions and mitigate against climate change. This will in turn reduce air pollution.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Walking is one of the best ways to appreciate and move around the city. Railway arches and the adjacent land is generally underutilised for the public benefit. Opening up routes, as this policy requires, along and activating these spaces will enhance the landscape and

				townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	ü	✓	Walking is one of the best ways to appreciate and move around the city. While railway arches and the adjacent land is generally underutilised, opening up routes, as this policy requires, along and activating these spaces will enhance the utility and increase appreciation for the railway arches and viaducts as heritage assets. The railway arches that the low line walking routes would be based upon and designed around are historic assets which have come to define the character of parts of the borough. The viaducts that run from London Bridge to Greenwich are particularly historic, being one of the longest and oldest railway viaducts in the world.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	More and better walking routes along and through the borough's railway viaducts will increase access to green space which has previously been less accessible because of the barrier-like nature of railway viaducts.
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	It encourages walking and seeks to make walking an attractive way of getting around. This is a form of sustainable travel and the policy will help minimise the need to travel by car, particularly where the Low Line walking routes open up routes between previously severed communities for which the railway viaducts acted as barriers.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to ensure strategic and local walking infrastructure is supported and delivered through the Low Line walking routes.

P52 – Cycling				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	A key determinant of poverty is physical health and access to employment. P50's requirement will help to encourage and provide for cycling, and affordable and healthy way to travel, which will improve access to employment. This will help to reduce poverty and encourage wealth creation.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	It will help to improve health by encouraging and providing for cycling, a healthy and active way to get around.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	It requires cycle parking to be safe, secure, convenient and accessible. These high standards for cycle parking and storage will help to reduce the theft of bicycles which are a common problem in London, and so reduce crime and the fear of crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Cycling promotes physical health and is an affordable and therefore inclusive way to get around. This means it will also have positive impacts on mental health and wellbeing in turn helping community cohesion and social inclusion. It should be noted that not everyone, such as those with mobility issues or small children, will find it easy, affordable or possible to undertake cycling. Therefore these groups must be accommodated with other affordable, healthy and inclusive forms of travel promoted through other policies in the plan. Policy P52 confirms with the London Plan cycle parking requirements set out in Tables 9 & 10.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	It will encourage cycling which will reduce demand for private vehicle trips and public transport. Private cars take up much more resources and space per person than many other modes of transport, particularly walking, cycling and public transport. Southwark will grow sustainably without adverse environmental impacts and carbon emissions through car free development in highly accessible areas and reduced reliance on the private car. This will in turn reduce contributions to climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	It will encourage cycling which will reduce demand for private vehicle trips and public transport. This will in turn reduce air pollution by

				reducing carbon emissions and the concentration of NO2 and particulate matters in the borough. Cycling is an alternative mode to reduce emissions from motorised transport.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	It encourages cycling and seeks to make cycling an attractive way of getting around. This is a form of sustainable travel and the policy will help minimise the need to travel by car, particularly where the key pieces of cycling infrastructure are delivered.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to ensure key pieces of cycling infrastructure are delivered including the Southwark Spine, cycle parking, and cycle hire docking stations and storage, shower and changing facilities in places of employment.

P53 – Car Parking				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓	✓	It seeks to minimise car use, which should indirectly make walking, cycling and public transport more attractive, which are all healthier modes of transport.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Car parking within the visible public realm (i.e. on the street or on ground floor or surface level) can have a detrimental impact on the vitality of the public realm by creating visual and physical barriers that do not contribute to the liveliness of cities. This can impact on the perceived safety of a space and increase the fear of crime and the opportunity for criminal activity to go unnoticed. This policy's restrictions on car parking should help to reduce this impact.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Car parking within the visible public realm (i.e. on the street or on ground floor or surface level) can have a detrimental impact on the vitality of the public realm by creating visual and physical barriers that do not contribute to the liveliness of cities. This can impact on the perceived safety of a space and increase the fear of crime and the opportunity for criminal activity to go unnoticed. This can impact on mental and emotional well being for users of spaces, particularly vulnerable groups. This policy's restrictions on car parking should help to reduce this impact.
			✓✓	Restricting car parking in the public realm will reduce physical barriers and help people, particularly children, the elderly and mobility impaired, move around more freely and encourage social interaction.

<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	It seeks to restrict car parking and where implemented, provide spaces as that are shared between developments and occupiers of nearby buildings, are car club bays and have electric vehicle charging points helping to reduce carbon emissions and contributions to climate change. Policy P53 confirms with the London Plan car parking requirements as set out in Table 11.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	It seeks to restrict car parking and where implemented, provide spaces as that are shared between developments and occupiers of nearby buildings, are car club bays and have electric vehicle charging points helping to reduce NO <sub>x</sub> and particulate matter pollutants that cars contribute to.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Street level car parking can have a negative effect on the public realm. Restricting this type of car parking via This policy will have a beneficial effect on the townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	It seeks to restrict car parking and where implemented, provide spaces as that are shared between developments and occupiers of nearby buildings, are car club bays and have electric vehicle charging points helping to reduce car use and, where they are used, make sure they are of a sustainable variety.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	?	?	It seeks to limit the infrastructure to accommodate the demand for car trips, and where it is accommodated for, ensure it is a sustainable version of what has traditionally been accommodated. However, it is

				<p>not clear as to whether the requirements set out in This policy will deliver the necessary infrastructure to support existing and future development, if that means meeting the existing and future demand. However, the sustainability benefits of not meeting this demand (through insufficient infrastructure supply) significantly outweigh the disbenefits of not providing it. The sustainability benefits, listed above in the analysis of this policy against the other IIA objectives, include modal shift towards less polluting, carbon and space intensive modes of transport such as walking, cycling and public transport. Reduction in car use both parked and in transit, will impact the public realm and make our streets and roads more pleasant and accommodating spaces for pedestrians and cyclists, further helping health and emissions. Therefore, even if the outcome of the implementation of this policy does not result in sufficient car parking space (infrastructure) to meet demand (from existing and future development) the council will continue to encourage behavioural change and shift in preferences through encouraging active travel and travel on public transport through the other policies in this plan.</p>
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P54 – Parking standards for disabled people and the physically impaired				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Some groups of users require accessible car parking spaces. Where they are required, they will help the people who need them to be as mobile as possible and access the required services and facilities. This will help improve mental health.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	It will benefit groups who have mobility issues, such as the elderly and disabled people, which will promote social inclusion and community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	It requires that any parking spaces for disabled people or those with mobility issues are, following a lack of allocation to particular persons, not permitted to be returned to the general car parking pool, which will help to reduce (or at least not increase) carbon emissions than if the policy did not have this limitation.
IIAO 7	To improve the air quality	✓	✓	It requires that any parking spaces for disabled people or those with mobility issues are, following a lack of allocation to particular persons, not permitted to be returned to the general car parking pool, which will help to reduce (or at least not increase) pollutants such as NO <sub>x</sub> and particulate matter than if the policy did not have this limitation. This will have a positive impact on air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	N/A	N/A	
IIAO 12	To conserve and enhance the historic	N/A	N/A	

	environment and cultural assets			
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	It requires that any parking spaces for disabled people or those with mobility issues are, following a lack of allocation to particular persons, not permitted to be returned to the general car parking pool, which will help to reduce (or at least not increase) the use of cars.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

**Integrated impact assessment for**

**Strategic policy 6 Climate Emergency**

Including

- P55: Protection of amenity
- P56: Open space
- P57: Open water space
- P58: Green infrastructure
- P59: Biodiversity
- P60: Trees
- P61: Reducing waste
- P62: Land for waste management
- P63: Contaminated land and hazardous substances
- P64: Improving air quality
- P65: Reducing noise pollution and enhancing sound
- P66: Reducing water use
- P67: Reducing flood risk
- P68: Sustainability standards
- P69: Energy

	SP6	P55	P56	P57	P58	P59	P60	P61	P62	P63
IIAO 1	✓✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓✓
IIAO 2	N/A	N/A	N/A	N/A	N/A	✓✓	N/A	N/A	N/A	N/A
IIAO 3	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓	✓✓	✓✓	✓✓
IIAO 4	N/A	N/A	✓✓	✓✓	✓✓	N/A	N/A	✓✓	✓✓	✓✓
IIAO 5	✓✓	N/A	✓✓	✓✓	✓✓	✓	N/A	N/A	N/A	✓✓
IIAO 6	✓✓	N/A	✓✓	?	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 7	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 8	N/A	N/A	N/A	N/A	N/A	N/A	N/A	✓✓	✓✓	N/A
IIAO 9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 10	N/A	✓	N/A	N/A	✓✓	✓✓	✓✓	✓	✓	✓✓
IIAO 11	N/A	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 12	N/A	✓✓	✓✓	✓✓	✓✓	N/A	✓✓	N/A	✓✓	✓✓
IIAO 13	N/A	N/A	✓✓	N/A	✓✓	✓✓	✓✓	N/A	✓✓	✓✓
IIAO 14	N/A	N/A	✓✓	✓✓	✓✓	✓✓	✓✓	N/A	✓✓	✓✓
IIAO 15	✓✓	✓✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 16	✓✓	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 17	✓✓	N/A	✓✓	✓✓	✓✓	✓✓	✓✓	N/A	✓✓	N/A
<b>Avg.</b>	<b>100%</b>	<b>95%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>90%</b>	<b>100%</b>	<b>93%</b>	<b>95%</b>	<b>100%</b>

Cont'd	P64	P65	P66	P67	P68	P69
IIAO 1	✓✓	✓✓	N/A	N/A	✓	✓
IIAO 2	N/A	N/A	N/A	N/A	N/A	N/A
IIAO 3	✓✓	✓✓	N/A	✓✓	✓	✓
IIAO 4	✓✓	N/A	N/A	N/A	N/A	N/A
IIAO 5	✓✓	✓✓	N/A	N/A	N/A	✓
IIAO 6	✓✓	N/A	✓✓	✓✓	✓✓	✓✓
IIAO 7	✓✓	N/A	N/A	N/A	✓	✓✓
IIAO 8	N/A	N/A	✓✓	✓✓	✓	✓✓
IIAO 9	N/A	N/A	✓✓	✓✓	✓	N/A
IIAO 10	✓✓	N/A	N/A	✓✓	✓	N/A
IIAO 11	✓✓	✓✓	N/A	✓✓	N/A	N/A
IIAO 12	✓✓	✓✓	N/A	N/A	N/A	N/A
IIAO 13	✓✓	✓✓	N/A	✓✓	✓	N/A
IIAO 14	✓✓	N/A	✓✓	✓✓	N/A	N/A
IIAO 15	✓✓	✓✓	N/A	N/A	✓✓	✓✓
IIAO 16	✓✓	N/A	N/A	N/A	N/A	N/A
IIAO 17	N/A	N/A	N/A	N/A	N/A	✓✓
<b>Avg.</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>61%</b>	<b>81%</b>

SP6 – Climate Emergency				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Promoting access to green space, improving health and access to services and employment through walkable neighbourhoods and cycling and public transport, as well as energy efficient buildings with reduced bills will help alleviate poverty and increase opportunities amongst Southwark's most deprived communities.
			✓✓	Through prioritising walking, we will make our popular tourist sites and cultural attractions as accessible and successful as they can be, helping them continue to be significant employers in the borough.
			✓✓	We will help to reduce poverty through the retrofitting of existing homes bringing the cost of energy bills down, saving residents money, which will help to reduce poverty, including fuel poverty and encourage wealth creation.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Protecting and enhancing our open and green spaces and biodiversity and habitats will ensure they can be used for recreation, leisure and sport for the existing and future generations, providing access to nature and biodiversity, cleaner air sporting facilities all of which will help enable the borough's population to lead healthy active lifestyles. Green space and infrastructure is known to increase mental and emotional well being which this policy will help to deliver and improve.
			✓✓	Promoting denser, walkable neighbourhoods that foster community cohesion and improving public transport accessibility will help to improve mental and physical health and reduce social exclusion.
			✓✓	It will both directly and indirectly help reduce exposure to poor air quality and seek to improve air quality: directly through requiring new sustainable buildings and retrofitting for existing buildings and indirectly, through the promotion of walking, cycling and public transport, which in turn should reduce private car use and the associated pollutant emissions.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	More people walking and cycling through well designed, legible streets will result in more "natural surveillance," improving security and safety. SP6 also specifies how developments will be made safer with well designed buildings and spaces that discourage crime and anti-social

				behaviour and foster a sense of community.
<b>IIAO 5</b>	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Part of being a greener and more sustainable borough will include well designed public realm and facilities that is built to last, in terms of both quality of materials and design for ease and cost of maintenance, as well as for people across the different stages of their lives, meaning a young family with small children and push chairs and older people or others with potential mobility issues.
			✓✓	It sets out how the council will work with local people to deliver a cleaner, greener safer borough which will help towards creating social inclusion and community cohesion.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	Emissions will be reduced through requiring new and existing buildings to be built to a high environmental standards, as well as promoting walking, cycling and public transport over private cars. SP6 will reduce contributions to climate change through requiring existing buildings to be retrofitted with sustainability measures and protecting and enhancing our green and open spaces for existing and future generations to enjoy. Urban greening will also be used to reduce the risk of flooding that may occur due to climate change.
			✓✓	The NSP will aim to meet the target to be net carbon zero by 2050 as set out in the Climate Change Act. SP6 sets out a strategy of environmental policies that both adapt to and mitigate against Climate Change to address the climate emergency. Modifications have been made to the policy to reflect this target. The 6 <sup>th</sup> Carbon Budget was adopted into law at the end of June, enshrining a reduction target to reduce emissions by 78% by 2035 compared to 1990 levels. An early partial plan review on next steps in response to accelerating targets to meet net zero carbon by 2050, as well as the Council's non-statutory 2030 carbon neutrality ambition to continue to adapt to and mitigate against climate change.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Air quality will be improved by requiring high environmental standards for new and existing buildings and promoting walking cycling and public transport. Protecting and improving the borough's network of green and open spaces will also help to reduce poor air quality concentrations.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water	N/A	N/A	

	resources			
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	☞✓	✓✓	It seeks to protect and improve the borough's network of open spaces including such as parks, trees and biodiverse habitats.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓✓	✓✓	It sets out how the council will deliver a cleaner, greener borough in part by reducing food risk through urban greening.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It will ensure new and existing housing is of a high environmental standard fit for habitation, including energy efficiency which is affected by insulation and the heating and cooling of new and old homes.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	It seeks to prioritise sustainable travel by walking, cycling and public transport over the car.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to ensure green infrastructure, which will have multiple benefits for delivering a cleaner, greener and safer borough will be secured

P55 – Protection of amenity				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Amenity values contributes a sustainable lifestyle and good health. Protection of amenity for present and future occupiers will contribute to good physical and mental health. Visual, auditory and odorous impacts can have a significant impact on amenity value. Protecting this amenity and reducing or mitigating against potential negative impacts will therefore directly influence improved mental health and reduce the risk of social exclusion.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	N/A	N/A	
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	✓✓	✓✓	This policy protects against the degradation of air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	The Protection of Amenity policy will consider amenity to include impacts of smell, noise, vibration, lighting or other nuisances which includes the impact on land and soils. The policy aims to protect the environment in Southwark which includes the quality of land and soils.
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It defines amenity in terms of visual impacts which can include townscapes, streetscapes and landscapes and the visual distinctiveness of places. This policy will protect against the degradation of visual amenity.
IIAO 12	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	It defines amenity in terms of visual impacts which can include historic assets which contribute to the visual distinctiveness of places. This policy will protect against the degradation of visual amenity.

<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It protects from the unacceptable loss of amenity, including existing residents who will rely on the implementation of this policy in assessing application that unacceptably threaten the amenity of their property, and opportunity to live in a decent home. Amenity considerations include: privacy, outlooks sense of overlooking and enclosure, impacts of smell, lighting and noise, vibration and other nuisances to ensure that amenity of those living, working or visiting Southwark are protected.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P56 – Open space				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Open space can provide significant health benefits for the population, providing places to take part in recreational sport, exercise and relaxation which are all important components to achieve and maintain optimum physical and mental wellbeing. Protecting the borough's open spaces, the majority which are green, will help to maintain and improve the health of residents and workers.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	This policy allows for limited development on protected open space providing it is appropriate to the use of the open space as open space. This can have a positive impact in reducing the fear of crime and preventing opportunity for crime as well-designed and maintained open spaces provide natural surveillance thereby preventing the instances of crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Open space can provide significant health benefits for the population, providing places to take part in recreational sport, exercise and relaxation which are important components to feeling a sense of social inclusion, equality and community cohesion. Open spaces are free of charge and accessible to everyone, so can be used by voluntary sector groups and community organisations which will go further to promote social inclusion and community cohesion, particularly for lower income groups.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Open space can provide significant climate change benefits. The majority of protected open space in the borough is green, which can reduce the urban heat island affect, consume excess carbon dioxide and help reduce the risk of flooding that may occur as a result of climate change by reducing the surface water run off and infiltration rates. The protection and improvement of open space plays an important role in climate change adaptation and mitigation.
IIAO 7	To improve the air quality	✓✓	✓✓	Open spaces can provide significant air quality benefits. Open spaces provide areas where pollutants can disperse into the atmosphere. This

				means they are no longer concentrated and pose a less significant health risk. Open spaces which are green can reduce carbon dioxide and increase oxygen, further cleansing air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓✓	✓✓	Open Spaces encourage natural biodiversity which supports healthy soil as well as efficiency of land-uses and densities.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	This policy requires that any development in open spaces should protect the landscape quality by not affecting its openness or detract from its character.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Some protected open spaces are of historic and/or cultural significance. This policy requires that any development in open spaces should protect the landscape quality by not affecting its openness or detract from its character which could derive from the historic or cultural significance of the space.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	Protected open spaces are of significant biodiversity value and contain a rich tapestry of habitats. This policy will ensure that these habitats and areas for different species are protected.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓✓	✓✓	Many protected open spaces are green spaces which provide significant flood risk reduction benefits, by way of providing areas which slow down the rate of surface run off and encourage infiltration to the water table.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to protect the largest and most significant pieces of green infrastructure in the borough to ensure continued use by current and future generations who live, work and visit the borough.

P57 – Open water space				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Open water space can provide significant health benefits for the population, providing places to take part in recreational sport, exercise and relaxation which are all important components to achieve and maintain optimum physical and mental wellbeing. Protecting the borough's open water spaces will help to maintain and improve the health of residents and workers. However open water spaces may be less accessible than, for example, open green space, for groups with mobility limitations. However the visual break from the heavily built up urban environment, combined with the aural tranquillity that often accompanies such spaces, can still provide significant mental health and well being benefits, even if accessibility is reduced relative to open green space or other types of open space.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	It allows for limited development on protected open space providing it is appropriate to the use of the open water space as an open water space. This can have a positive impact on the fear and perception of crime and opportunity for crime as the spaces can host activities which will provide natural surveillance.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Open water space can provide significant health benefits for the population, providing places to take part in recreational sport, exercise and relaxation which are can be important components to feeling a sense of social inclusion, equality and community cohesion. Some of the protected open water spaces can normally be used free of charge so can be used by voluntary sector groups and community organisations which will go further to promote social inclusion and community cohesion, particularly for lower income groups. However open water spaces may be less accessible than, for example, open green space, for groups with mobility limitations.
IIAO 6	To reduce contributions to climate change	?	?	Open water space can provide some climate change benefits such as reducing the urban heat island effect and providing bodies to catch

				surface water run off collected from large amounts of rainfall and can reduce the risk of flooding that may be increased due to climate change. However, bodies of water often tend to release more carbon dioxide into the atmosphere than they absorb, making them net sources of greenhouse gases. Therefore the sustainability climate change and environmental sustainability benefits of the protected open water space is not clear. Despite this, the other (non-climate change related) environmental, social, and economic benefits offered by the protection of open water space are considered to outweigh the uncertain climate change impacts identified by the IIA. The New Southwark Plan does not propose to create any new protected open water spaces as a result of this or other policies.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Open water spaces can provide areas where pollutants can disperse freely into the atmosphere so they are no longer concentrated. This means they pose a less significant health risk.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It requires that any development in open water spaces should protect the landscape quality by not affecting its openness or detract from its character.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Some of P57's protected open water spaces are of historic and/or cultural significance. The policy requires that any development in open water spaces should protect the landscape quality by not affecting its openness or detract from its character which could derive from the historic or cultural significance of the space.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	Its protected open water spaces are of significant biodiversity value and contain a rich tapestry of habitats. P57 will ensure that these habitats and areas for different species are protected above, under and on the edge of the open water space.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓✓	✓✓	Open water space can provide large water bodies to catch surface water run off collected from large amounts of rainfall and can reduce the risk of flooding that may be increased due to climate change.
<b>IIAO 15</b>	To provide everyone with the	N/A	N/A	

	opportunity to live in a decent home			
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to protect the largest and most significant pieces of 'blue' infrastructure in the borough to ensure continued use by current and future generations who live, work and visit the borough.

P58 – Green infrastructure				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Providing green infrastructure will have significant benefits for physical and mental health and well being. Green infrastructure has been shown to improve mental health and often provides the opportunity for recreation and leisure.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	It requires that major development provides green infrastructure with arrangements for long-term stewardship and maintenance funding in place. This will help ensure that green infrastructure continues to remain inviting and is well kept which will result in it being well used. This reduces the chance that the green infrastructure and the surroundings will be associated with the fear and perception of crime, which is often linked to a dilapidated and unkempt environment.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Providing green infrastructure will have significant benefits for reducing social exclusion, promoting equality, diversity and community cohesion. Green infrastructure has been shown to improve mental health and often provides the opportunity for recreation and leisure.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Green infrastructure can provide significant climate change benefits due to plants consuming one of the key greenhouse gases, carbon dioxide and releasing oxygen. Further to this, green infrastructure can provide resilience to the effects of a changing climate, including reducing the effect of the urban heat island where plant material absorbs and releases less heat, and reducing the risk of flooding that is occurring as a result of a changing climate by slowing the surface run off rate and enhancing infiltration rate into the water table. Green infrastructure plays an important role in climate change adaptation and mitigation.
IIAO 7	To improve the air quality	✓✓	✓✓	Green infrastructure can provide significant air quality benefits due to plants being consumers of carbon dioxide and releasing oxygen as a waste product, which in turn cleans our air. Particular species of tree can have significant positive or negative affects on air quality; however these risks are mitigated via the Tree Policy (P60).

<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓✓	✓✓	Green infrastructure has significant potential to maintain and enhance the quality of land and soils and be of high ecological and environmental value
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It will help to protect and enhance the townscape and landscape by requiring green infrastructure to be design to be integrated with it.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	It requires new green infrastructure, open spaces and green links to provide multiple benefits for wildlife and support species migration while supporting native species.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓✓	✓✓	It requires new green infrastructure, open spaces and green links to provide multiple benefits including adapting to climate change. Climate change adaption measures include reducing flood risk that is occurring as a result of a changing climate. Green infrastructure can act as water catchment basins for surface water run-off which would otherwise pool in areas vulnerable to surface water flooding.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	It will provide and encourage the use of new and high quality walking and cycling routes as part of green infrastructure away from main roads. This will encourage walking and cycling and in turn reduce demand for car use.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It requires new green infrastructure, green links and open space to be delivered by development which can integrate with the existing and future green infrastructure networks, townscape and landscape for the benefit of both existing and future residents, workers and wildlife. This policy also requires that major development include arrangements for the long term stewardship and maintenance funding in place to ensure the green infrastructure is available and kept in good condition for future users.

P59 – Biodiversity				
I/A Objective	Description	Averaged grading	Sub grading	Commentary
I/AO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
I/AO 2	To improve the education and skill of the population	✓✓	✓✓	Areas with strong biodiversity can provide the opportunities for schools to engage with and learn about nature, for which there is less opportunity to do in a urbanised environment.
I/AO 3	To improve the health of the population	✓	✓	Areas with strong biodiversity value can comprise extensive fauna, which take carbon dioxide out of the atmosphere and release oxygen, improving air quality. Particular species of plants are also able to actively remove pollutants by natural chemical and biological processes. Conversely, some species are also able to compound air quality problems. The risks of these species establishing themselves in areas of biodiversity in Southwark will need to be carefully monitored, however overall P59 is considered to provide a net benefit to air quality by default. This in turn will have positive impacts on physical health.
I/AO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
I/AO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	Areas with strong biodiversity can provide the opportunities for schools and the community to engage with and learn about nature, for which there is less opportunity to do in a heavily urbanised environment like Southwark than elsewhere. This will promote social inclusion and community cohesion, particularly for young people.
I/AO 6	To reduce contributions to climate change	✓✓	✓✓	Areas of significant biodiversity are normally host to large array of plant life, measured by both density and coverage. The coverage that such plant life provides can reduce the impact of the urban heat island effect, which will help to bring higher temperatures down which occur as a result of climate change, and will mean less resources, which often emit carbon dioxide, will be needed for cooling buildings. In addition to this, flood risk which may be increased due to climate change can be alleviated by the slower run off rates provided by areas rich in plant life. Finally, plants consume carbon dioxide, a key greenhouse gas which contributes to global warming, and releases

				oxygen. Therefore protecting areas rich in biodiversity will reduce contributions to climate change. Biodiversity plays an important role in adapting and mitigating climate change.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	Areas with strong biodiversity value can comprise extensive fauna, which take carbon dioxide out of the atmosphere and release oxygen, improving air quality. Particular species of plants are also able to actively remove pollutants by natural chemical and biological processes. Conversely, some species are also able to compound air quality problems. The risks of these species establishing themselves in areas of biodiversity in Southwark will need to be carefully monitored, however overall P59 is considered to provide a net benefit to air quality by default. This in turn will have positive impacts on physical health.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓✓	✓✓	Areas with strong biodiversity value, including areas with quality soils, will be protected through P59.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Green walls and other components important to biodiversity, such as trees, can have a positive impact on the townscape and landscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	It seeks to protect both designated and undesignated ancient woodland which are important heritage assets.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	Its key aim is the protection and enhancement of biodiversity.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓✓	✓✓	Areas of significant biodiversity are normally host to large array of plant life, measured by both density and coverage. The coverage that such plant life provides can reduce the impact of flood risk which may be increased due to the slower run off rates provided by areas rich in plant life.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future	✓✓	✓✓	Areas of biodiversity can contribute significantly to the wider network of green infrastructure.

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P60 – Trees				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	It requires that trees delivered as part of development must be species which provide air quality benefits. This will improve the health of the population, particularly for those with respiratory problems caused by poor air quality.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	N/A	N/A	
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Protection and the planting of new trees will help reduce climate change by consuming carbon dioxide, a key greenhouse gas which contributes to global warming. The coverage that trees provide can reduce the impact of the urban heat island effect, which will help to bring higher temperatures down which occur as a result of climate change, and will mean less resources, which often emit carbon dioxide, will be needed for cooling buildings. In addition to this, flood risk which may be increased due to climate change can be alleviated by the slower run off rates provided by the canopy cover of trees. The protection of trees, especially mature ones have a high potential for carbon storage and play a crucial role in adapting to and mitigating against climate change.
IIAO 7	To improve the air quality	✓✓	✓✓	It requires that species selection and orientation of new trees should provide air quality benefits. All trees consume carbon dioxide and release oxygen, which will help to improve air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	

<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓✓	✓✓	Trees are beneficial in maintaining and enhancing the quality of soil due to supportive microbes from trees and tree roots. Supporting existing trees also encourages development to support existing green infrastructure, reducing densities of building coverage.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	This policy requires that species selection and orientation of new trees provide air quality benefits. All trees consume carbon dioxide and release oxygen, which will help to improve air quality.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	It requires that trees within a conservation area, the curtilage of a listed building or veteran and ancient trees are protected. P60 recognises the importance of these types of trees as comprising a part of and contributing to the borough's historic environment.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	It requires that new trees are planted and that existing trees are protected, which will contribute significantly to the protection and enhancement of green corridors and biodiversity.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓✓	✓✓	Trees can help reduce flood risk by reducing the rate of surface water run off and ground water infiltration. P60 seeks to ensure new trees are provided as part of development and existing trees are protected. Therefore P60 will help reduce the vulnerability to flooding.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	Trees, which P60 seeks to protect are required to be delivered as part of new development. This is therefore an important component of supporting green infrastructure through development.

P61 – Reducing waste				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Suitable management of waste is a public health issue. Requiring suitable waste management in and for development will ensure public health is not put at risk.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Inadequate waste provision and management can have a negative impact on the public realm and public amenity which can exacerbate the fear or perception of crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	N/A	N/A	
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	The waste management hierarchy's key aim is the sustainable use of resources. Sustainable use of resources, including recycling, reusing waste materials will reduce the need to expend energy (and produce carbon emissions) by creating new materials which could otherwise have been recouped from waste material. Therefore the approach set out in the waste management hierarchy in this policy will help to reduce contributions to climate change.
			✓✓	The requirement for Circular Economy statements from major referable schemes is crucial for the adaptation and mitigation of climate change because it maximises the embodied carbon in existing building materials and waste and ensures their maximisation in their use and management.
IIAO 7	To improve the air quality	✓✓	✓✓	One factor of poor air quality can be odours, which can be effected by inadequate waste management. This policy will ensure this potential impact is suitably managed, reducing exposure to poor air quality.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	The waste management hierarchy set out in this policy is chiefly concerned with avoiding waste and maximise the reuse or recycling of waste. Circular Economy Statements are required for major referable development this is crucial to meet circular

				economy principles which will maximise the use of waste as a resource and ensure a greater reduction in waste.
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓	✓	It seeks to minimise waste going to landfill and ensure adequate waste management is provided in and for new development. This will help ensure land for landfill is minimised due to reduced demand, helping protect soils which may otherwise be contaminated by landfill, and avoiding contamination of soils on or near the site by providing adequate waste management.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It requires adequate onsite waste management and where this is not possible off site arrangements. Consideration of what is adequate will include the impact of the waste management strategy on the amenity (including visual amenity), access and the environment, which comprise constituent parts of the townscape and landscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P62 – Land and waste management				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Depending on the scale, type and location of any new waste management facilities, there is a risk that air quality could be negatively impacted from a new waste facility. This could impact on the health and wellbeing of any nearby population. This policy requires that new facilities must not adversely impact amenity, which can include odorous amenity, however, so this risk is mitigated.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Inadequate waste provision and management can have a negative impact on the public realm and public amenity which can exacerbate the fear or perception of crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	N/A	N/A	
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	There is significant potential for new waste management facilities to reduce CO <sup>2</sup> and greenhouse gas emissions by sustainably processing waste, including re-using waste material, recycling waste material and capturing energy from waste material and being operated on the principles of the 'circular economy' which seeks to integrate sustainably to minimise waste, and by extension carbon emissions. Southwark's currently protected waste management facility has various recycling facilities which contribute to reducing climate change such as recycling and providing waste to the nearby South East London Combined Heat and Power (SELCHP) plant for energy.
IIAO 7	To improve the air quality	✓✓	✓✓	Depending on the scale, type and location of any new waste management facilities, there is a risk that air quality could be negatively impacted from a new waste facility. This policy requires that new facilities must not adversely impact amenity, which can include odorous amenity, however, so this risk is mitigated.

<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	The protection of existing and requirements proscribed for new waste management facilities have a shared key aim of minimising waste going to land fill and maximising the sustainable use of waste, including re-use, recycling and energy capture.
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓	✓	It provides protection for existing and requirements for new waste management facilities, which both seek to minimise waste going into landfill and maximise the sustainable use of waste. Minimising the amount of waste which goes to landfill will indirectly benefit soil quality which might otherwise be used for landfill.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It requires that new waste management facilities avoid unacceptable harm on the environment and residential amenity, which includes visual amenity and impact on the landscape and townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	It requires that new waste management facilities avoid unacceptable harm on the environment and residential amenity, which includes visual amenity and impact on heritage assets.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	It requires that new waste management facilities avoid unacceptable harm on the environment, which includes biodiversity.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓✓	✓✓	It requires that new waste management facilities avoid unacceptable harm on the environment, which includes flood risk.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to ensure the borough has sufficient waste management infrastructure.

**P63 – Contaminated land and hazardous substances**

IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Remediation of derelict sites and removal of hazardous substances will enable new development to come forward which includes employment uses and other non-residential uses such as community facilities and social infrastructure as well as affordable homes. Developments that incorporate these elements will help to tackle poverty and create employment and encourage wealth creation
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Removing hazardous substances and remediating contaminated land will provide a significant public health benefit where by substances and land previously a risk to public health have been de-risked
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	It requires that it will not be permitted when it has an adverse impact on the environment which includes impact on the landscape and townscape. This policy requires remediation of contaminated sites and removal of hazardous substances. Sites with such conditions, by virtue of the heavy industrial nature of the land use which lead to sites and substances having to these conditions, are often an eyesore and not attractive and contribute to the fear of crime and opportunity for crime due to the lack of passive surveillance. The remediation and removal of these sites and substances will help to positively impact this.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	It requires that it will not be permitted when it has an adverse impact on the environment which includes impact on the landscape and townscape. This policy requires remediation of contaminated sites and removal of hazardous substances. Sites with such conditions, by virtue of the heavy industrial nature of the land use which lead to sites and substances having to these conditions, are often an eyesore and not attractive and contribute to the fear of crime and opportunity for crime due to the lack of passive surveillance. The remediation and removal of these sites and substances will help to positively impact this which will help promote community cohesion. These sites are often severed from

				the surrounding communities and act as barriers to movement and therefore social inclusion. The remediation and removal of these sites and substances will enable them to come forward for development which reverses this, connecting communities and providing for greater social inclusion and cohesion.
<b>IIAO 6</b>	To reduce contributions to climate change	✓✓	✓✓	Through the remediation of contaminated land and removal of hazardous substances from sites, land will be able to be re-used for development that was previously not possible. This represents a reuse of resources (land) reducing the need for urban inefficient urban sprawl and will help reduce contributions to climate change.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	It requires that will not be permitted when it has an adverse impact on the environment which includes air quality.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓✓	✓✓	It requires that will not be permitted when it has an adverse impact on the environment which includes impact on land and soils. This policy requires that hazardous substances be handled and removed from any site and remediation programmes improve the condition of the land, which will have a positive impact on soil quality within and around the site.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It requires that will not be permitted when it has an adverse impact on the environment which includes impact on the landscape and townscape. This policy requires remediation of contaminated sites and removal of hazardous substances. Sites with such conditions, by virtue of the heavy industrial nature of the land uses which lead to sites and substances having to these conditions, are often an eyesore and not attractive. The remediation and removal of these sites and substances will allow for new development to come forward that contributes positively to the townscape and character.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	It requires that will not be permitted when it has an adverse impact on the environment which includes impact on heritage assets.
<b>IIAO 13</b>	To protect and enhance open spaces,	ü✓	✓✓	It requires that will not be permitted when it has an adverse

	green corridors and biodiversity			impact on the environment which includes biodiversity. This policy requires that hazardous substances be handled and removed from any site and remediation programmes improve the condition of the land, which will have a positive impact on soil quality within and around the site which will help biodiversity.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓✓	✓✓	It requires that will not be permitted when it has an adverse impact on the environment which includes flood risk.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

**P64 – Improving air quality**

IIA Objective	Description	Averaged grading	Sub grading	
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Poor air quality is a key factor in poor health, particularly respiratory health, in urban populations such as Southwark. Health is a key factor in poverty, therefore improving air quality, as this policy seeks to do, will help to alleviate poverty. Improving air quality will also help make Southwark an attractive place to do business, encouraging employers to locate here and encouraging wealth creation.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Poor air quality is a key factor in poor health, particularly respiratory health, in urban populations such as Southwark. Therefore improving air quality, as this policy seeks to do, will help to improve health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Vulnerable users of streets and buildings such as children and the elderly can be at risk of being impacted disproportionately by poor air quality. This policy will benefit these groups the most and help to promote social inclusion, equality and community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	On site urban greening and offsite measures designed to improve air quality, such as green infrastructure, as prescribed in This policy will help to reduce contributions to climate change adaptation and mitigation.
IIAO 7	To improve the air quality	✓✓	✓✓	On site urban greening and offsite measures designed to improve air quality, such as green infrastructure, as prescribed in this policy, will help to address air pollution issues.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	✓✓	✓✓	
IIAO 11	To protect and enhance quality of	✓✓	✓✓	

	landscape and townscape			
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	On site urban greening and offsite measures designed to improve air quality, such as green infrastructure, are prescribed in this policy, and will help to provide for biodiversity.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓✓	✓✓	On site urban greening and offsite measures designed to improve air quality, such as green infrastructure, as prescribed in this policy, will help to reduce flood risk.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Air quality includes internal air quality, such as that in people's homes, and the pollution experienced by residents from their amenity spaces in their homes. P66 will help to mitigate and reduce poor air quality for residential developments so that healthy, decent homes are provided in the borough.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Improving air quality in the borough will make walking and cycling more attractive ways to move around as currently poor air quality is legitimately cited as a reason that some people avoid partaking in both.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

**P65 – Reducing noise pollution and enhancing soundscapes**

IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Noise can have a significant impact on mental health. Health is a key factor in working to reduce poverty. Therefore reducing noise and promoting appropriate soundscapes will help facilitate positive mental health and help tackle poverty.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	Noise can have a significant impact on mental health. Therefore reducing noise and promoting appropriate soundscapes will help facilitate positive mental health and promoting emotional wellbeing.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Noise can have a significant impact on mental health and wellbeing which can be factors in social isolation and exclusion. Reducing and mitigating noise and promoting appropriate soundscapes will help facilitate positive mental health and promoting emotional wellbeing and in turn social inclusion and community cohesion. The requirement for developments to analyse and enhance positive acoustic environments will help to provide a sense of place and identify to a space, further helping social inclusion, mental well being and community cohesion.
IIAO 6	To reduce contributions to climate change	N/A	N/A	
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
IIAO 9	To encourage sustainable use of water resources	N/A	N/A	
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Noise can have a significant impact on the perception of spaces, including townscapes and landscape. Requiring noise reduction and mitigation and promoting appropriate soundscapes will help facilitate positive interaction and appreciation of landscape and

				townscape
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Noise can have a significant impact on the perception of spaces, including heritage and cultural assets. Requiring noise reduction and mitigation and promoting appropriate soundscapes will help facilitate positive interaction and appreciation of heritage and cultural assets.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	Noise can have a significant impact on the perception of spaces, including animals as part of the biodiversity in the borough. Requiring noise reduction and mitigation and promoting appropriate soundscapes will help facilitate positive relationship between biodiversity and noise and sound.
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Noise can have a significant effect on mental health. Homes can be considered as "noise sensitive development" meaning the application of this policy help provide "healthy homes" which will contribute to positive mental health.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P66 – Reducing water use				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	N/A	N/A	
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	N/A	N/A	
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Re-using water on site will reduce energy, and CO <sup>2</sup> emissions, where water is pumped from large scale water infrastructure. Water usage reduction is crucial to adapting to climate change.
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	It seeks to maximise the opportunity for the re-use of rainwater and grey water captured and used in development, which would otherwise be considered a waste material.
IIAO 9	To encourage sustainable use of water resources	✓✓	✓✓	Its key aim is to encourage the sustainable use of water resources through requiring the stricter “optional” limit on water use allowed by Building Regulations and encouraging rainwater capture re-use and grey water re-use. For major development to ensure its proper management, applicants are encouraged to discuss with water companies to ensure water scarcity is not an issue.
IIAO 10	To maintain and enhance the quality of land and soils	N/A	N/A	
IIAO 11	To protect and enhance quality of landscape and townscape	N/A	N/A	
IIAO 12	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
IIAO 14	To reduce vulnerability to flooding	✓✓	✓✓	This policy seeks to maximise the opportunity for the re-use of rainwater and grey water captured and used in development,

				which would otherwise be discharged into the sewer either indirectly across the urban environment to a drain or directly from the property's plumbing which has the potential to contribute to risk of surface water flooding, particularly in times of high rainfall.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P67 – Reducing flood risk				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	N/A	N/A	
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓✓	✓✓	It requires that developments incorporate sustainable urban drainage measures which often come in the form of green infrastructure. Green infrastructure has a variety of physical and mental health benefits described elsewhere in the IIA. Due to this requirement this policy is considered to have a positive impact on mental and physical health and well being.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	N/A	N/A	
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	It seeks to reduce flood risk including through sustainable urban drainage measures which often includes green infrastructure. Green infrastructure can help reduce the urban heat island effect, which in turn means less resources and energy is needed to cool buildings and so reduces CO <sup>2</sup> emissions. Reducing flood risk is crucial for the adaptation to climate change.
IIAO 7	To improve the air quality	N/A	N/A	It seeks to reduce flood risk including through sustainable urban drainage measures which often includes green infrastructure. Green infrastructure can provide air quality benefits however it is likely that the air quality benefits accrued from the type of green infrastructure to be provided as part of sustainable urban drainage systems will be limited.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	
IIAO 9	To encourage sustainable use of water resources	✓✓	✓✓	It seeks to reduce flood risk including through sustainable urban drainage measures which often includes green infrastructure, which can provide multiple sustainability benefits including improving water quality and efficient use of water resources.
IIAO 10	To maintain and enhance the quality of	✓✓	✓✓	It seeks to reduce flood risk including through sustainable urban

	land and soils			drainage measures which often includes green infrastructure, which can provide multiple sustainability benefits including improving water quality and improving biodiversity value of green infrastructure and spaces, including removing pollutants from water and improving the quality of soils.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	It requires that development along the River Thames be set back by 10m for the purposes of improving the landscape provided by and townscape adjacent to the river, which is due to be obstructed by river walls in the latter part of the 21 <sup>st</sup> century. Development which adheres to this and related requirements in this policy will help to significantly protect and enhance the landscape and townscape of the River Thames.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	It requires that development along the River Thames be set back by 10m for the purposes of improving the heritage and cultural asset value provided by and adjacent to the river, which is due to be obstructed by river walls in the latter part of the 21 <sup>st</sup> century. Development which adheres to this and related requirements in this policy will help to significantly protect and enhance the heritage and cultural asset value of the River Thames.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	Reducing flood risk is likely to have a positive impact, by way of protecting, biodiversity. The implementation of sustainable urban drainage measures as part of this policy will provide opportunities for urban greening which can form habitat for biodiversity.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓✓	✓✓	The key aim of this policy is to reduce flood risk by ensuring development carefully assesses the risk of flooding on the site and incorporating sustainable urban drainage measures.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P68 – Sustainability standards				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	Non-residential buildings with high environmental standards are popular with businesses due to reduced artificial heating and cooling requirements and because of the opportunity to enhance their corporate social and environmental responsibility reputation. Similarly for residential buildings, environmentally friendly buildings often cost less to heat and cool, and therefore reduce the risk of fuel poverty, which can be a particular issue for the elderly.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓	✓	High environmental standards, including BREEAM levels, may include boilers and plant which produce a certain amount CO <sub>2</sub> emissions to improve air quality. Improved air quality will have a positive impact on the health of the population.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	N/A	N/A	
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Its key aim is to reduce contributions to climate change by requiring high environmental standards. Buildings designed and built with high environmental standards will reduce the demand for carbon-intensive resources which contribute to climate change. Ensuring that new development meets the highest sustainability standards is crucial for climate change adaptation and mitigation.
IIAO 7	To improve the air quality	✓	✓	High environmental standards, including BREEAM levels, may include boilers and plant which produce a certain amount CO <sub>2</sub> emissions to improve air quality. Improved air quality will have a positive impact on the health of the population.

<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	✓	High environmental standards for BREEAM levels include how waste is handled in the construction and completed development.
<b>IIAO 9</b>	To encourage sustainable use of water resources	✓	✓	High environmental standards for BREEAM levels include how efficiently water is handled in the construction and completed development.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓	✓	High environmental standards for BREEAM levels includes how ecologically sensitive and beneficial the construction and completed development is.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	High environmental standards for BREEAM levels includes how ecologically sensitive and beneficial the construction and completed development is which will impact positively on biodiversity.
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	It seeks to ensure new and existing homes are designed and built, refurbished or converted are well designed for the benefits of the environment as well as the occupier. This policy's requirement to minimise the risk of overheating will not only have environmental benefits, but also for the comfort, safety and affordability of homes where overheating risks impacting on the cost of energy bills due to burdensome cooling requirements.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

P69 – Energy				
IIA Objective	Description	Averaged grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	Sustainable energy methods can ultimately reduce the cost of fuel for everyone thereby minimising the number of people who experience fuel poverty.
			✓	It requires that development that does not achieve carbon savings targets on site should be offset off site. This could involve retrofitting existing social housing which house of our most deprived residents. This would reduce energy bills, in turn alleviating poverty, including fuel poverty.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	✓	✓	It requires that schemes are designed and constructed using a range of measures which reduce carbon emissions, such as energy efficiency and connecting to heat networks. This will help reduce the energy demand from buildings and improve the NOx emissions from development. Reduction in NOx emissions results in better air quality than would otherwise be achieved. Improved air quality will help to improve health, particularly for those with respiratory problems and will reduce the risk of developing respiratory problems caused by poor air quality.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	Fuel poverty is often experienced by elderly people, young children and vulnerable users with lower incomes. New development that adheres to the energy hierarchy has the potential to positively affect people from a deprived background more so than others. The benefits accrued by these particular groups by the requirements set out in this policy will help to reduce social isolation and promote equality, diversity and community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Its key aim is to reduce contributions to climate change by requiring energy consumption reduction and carbon emissions savings which will reduce the contributions to climate change. The policy ensures that all development is assessed with climate change in mind and that all major development meet 100% net

				carbon zero onsite, this is crucial to mitigate against climate change and meet our climate change targets. Where this is not possible a carbon offset contribution is collected and used to offset the carbon emissions not reduced onsite.
<b>IIAO 7</b>	To improve the air quality	✓✓	✓✓	It requires that schemes are designed and constructed using a range of measures which reduce carbon emissions, such as energy efficiency and connecting to heat networks. This will help reduce the energy demand from buildings and improve the NOx emissions from development. Reduction in NOx emissions results in better air quality than would otherwise be achieved.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	It includes the opportunity to reduce carbon emissions through waste heat capture in combined heat and power (CHP) energy supply systems, which are significantly more efficient, by virtue of utilising waste heat, than conventional systems.
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Minimising the carbon emissions embedded in new housing will future proof them meaning they will not need to be demolished and redeveloped because they are old and inefficient in relation to energy consumption, heating and powering
			✓✓	Requiring adequate waste management as part of residential development will help to contribute to providing decent and healthy homes.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to ensure development provides, connects to or is future proofed to connect to decentralised energy networks, which will

				increasingly form a key piece of energy infrastructure as the energy grid decarbonises and moves to lower carbon, more efficient forms of energy supply such as this.
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## Appendix 7: Assessment of the Implementation Policies

The following tables set out the impacts identified through IIA of the area visions, proposals map and site allocations of the Proposed changes to the Submitted New Southwark Plan and main modifications following examination in public on the sustainability implications. Each implementation policy set out in the plan is appraised against 17 sustainability objectives, encompassing economic, social and environmental aspects. Each objective is measured on a scoring scale (Key 1), with each grade assigned a numeric value, symbol and colour. Alongside the scoring, a detailed commentary on the policy is provided.

### Key 1: Individual scoring against each objective

Symbol and colour	Scoring Value (%)	Score	Description
✓✓	100	Major or direct positive	The proposed option/policy contributes significantly to the achievement of the objective.
✓	50	Minor or indirect positive	The proposed option/policy contributes to the achievement of the objective but not significantly or indirectly.
-	0	Neutral	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
x	-50	Minor or indirect negative	The proposed option/policy detracts from the achievement of the objective but not significantly.
xx	-100	Major or direct negative	The proposed option/policy detracts significantly from the achievement of the objective.
?	N/A	Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.

At the bottom of the table, there is an averaged scoring of the 17 objectives to indicate each strategic policy's and development management policy's overall efficacy in meeting the sustainability objectives. The colour bar below (key 2) divides the overall scoring into three categories from positive, neutral to negative.

### Key 2: Averaged IIA objectives scoring for each policy

Negative

Neutral

Positive



	IP1	IP2	IP3	IP4	IP5	IP6	IP7	IP8
IIAO 1	✓	✓✓	✓✓	✓✓	✓✓	✓	✓	✓✓
IIAO 2	✓✓	✓✓	✓✓	N/A	✓	✓	N/A	✓✓
IIAO 3	✓✓	✓✓	✓✓	N/A	✓	✓	N/A	✓✓
IIAO 4	✓✓	✓✓	✓✓	✓✓	N/A	✓	N/A	N/A
IIAO 5	✓✓	✓✓	✓✓	✓✓	x	✓	✓	✓✓
IIAO 6	N/A	✓✓	✓✓	N/A	?	✓✓	N/A	✓✓
IIAO 7	✓✓	✓✓	✓✓	N/A	?	✓	N/A	N/A
IIAO 8	✓✓	N/A	✓✓	N/A	N/A	✓	N/A	N/A
IIAO 9	?	N/A	✓✓	N/A	N/A	✓	N/A	N/A
IIAO 10	N/A	N/A	✓✓	✓✓	N/A	✓	N/A	N/A
IIAO 11	N/A	N/A	✓✓	✓✓	N/A	✓	N/A	N/A
IIAO 12	N/A	N/A	✓✓	N/A	N/A	✓	N/A	N/A
IIAO 13	✓✓	N/A	✓✓	N/A	N/A	✓	N/A	N/A
IIAO 14	?	N/A	✓✓	N/A	N/A	✓	N/A	N/A
IIAO 15	N/A	N/A	✓✓	✓✓	?	✓	✓✓	N/A
IIAO 16	✓✓	✓✓	✓✓	N/A	N/A	✓	N/A	N/A

IIAO 17	✓✓	✓✓	✓✓	N/A	N/A	✓	N/A	N/A
Avg.	95%	100%	100%	100%	38%	56%	75%	100%

IP1 – Infrastructure				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	Infrastructure networks work to tackle poverty and encourage wealth creation, by providing the utilities and physical or organisational structures and facilities required for the successful operation of a society.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	The improvement to educational infrastructure is supported by this policy, including provision of early year's facilities, schools and facilities for children and young people. This will help accommodate a changing demographic and growing population in line with the development management policies, area visions and site allocations.
IIAO 3	To improve the health of the population	✓✓	✓✓	Health infrastructure is considered in this policy, where the infrastructure for health and emergency services are required to support the needs of existing and future residents.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Police infrastructure and improved transport infrastructure will directly reduce fear of crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Faith premises, leisure facilities and cultural facilities support an overall improvement to social inclusion, equality, diversity and community cohesion.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Improved transport infrastructure works to support reduction in NOx particulates, supporting better air quality. The council's strategy of reducing car usage and moving towards modes of active travel supports this indicator.
IIAO 7	To improve the air quality	✓✓	✓✓	Improved transport infrastructure works to support reduction in NOx particulates, supporting better air quality. The council's strategy of reducing car usage and moving towards modes of active travel supports this indicator.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	Waste infrastructure and partnerships are considered in this policy, which supports overarching waste strategy targets.
IIAO 9	To encourage sustainable use of water resources	?	?	There is a risk that infill development on existing estates will take place (non-formally protected) on open space. However this is considered previously developed land. Protected open space and previously non-

				developed land will not be developed for housing.
			✓✓	Water and sewerage facilities are required to promote existing and future residents as part of this policy.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	Green infrastructure is supported through the implementation of this policy and preservation of green links through the Green Infrastructure Policy. The background paper outlines how this will be achieved and managed.
<b>IIAO 14</b>	To reduce vulnerability to flooding	?	?	Reduced vulnerability to flooding is supported through sufficient water and sewerage infrastructure in this policy. However, a clash in objectives is possible as this policy also supports hard surfacing and highways, which can outdo the benefits achieved from sustainable urban drainage system. For this reason there is potential for clashing objectives from this policy and the overall appraisal in support of reducing flood vulnerability is uncertain.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Sustainable walking and cycling routes are promoted through the transport element of this policy; however the infrastructure to be provided is not specific to walking and cycling and suggests all highways alternatives. Since the NSP needs to be read as a whole, it is clear that the infrastructure supported through this policy is sustainable transport, as clarified by the development management policies under SP5.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	It seeks to ensure infrastructure both social and physical, is in place to support the occupants of current and future developments throughout their lifetime. This will be achieved through hared servicing option, working with a range of infrastructure providers, neighbouring boroughs and utility companies.

IP2 – Transport Infrastructure				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Improved public transport supports the opportunities for all to have greater accessibility around the borough and beyond to London. This has the potential to unlock greater access to socio-economic opportunities.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Improved public transport supports the accessibility of all to education and skills training provisions beyond the borough, more usefully utilising the great array of resources throughout London.
IIAO 3	To improve the health of the population	✓✓	✓✓	Improved public transport infrastructure helps support behavioural change away from privately owned cars, which can lower congestion on roads and thereby improve the health of the population. Secondly, it supports the increase in cycle hire opportunities and walking routes which supports active travel, beneficial to health.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Improved walking and cycling routes would increase the neighbourhood surveillance in areas that may previously has been seen as higher risk of crime, thereby with greater thoroughfare along these routes, reducing the fear of crime.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Public transport opportunity ensures that all have access to the same level of movement infrastructure, which ensures that travel is not directly a luxury good.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Improved transport infrastructure works to support reduction in NOx particulates, supporting better air quality. The council's strategy of reducing car usage and moving towards modes of active travel supports this indicator.
IIAO 7	To improve the air quality	✓✓	✓✓	Improved transport infrastructure works to support reduction in NOx particulates, supporting better air quality. The council's strategy of

				reducing car usage and moving towards modes of active travel supports this indicator.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Sustainable walking and cycling routes are promoted through the transport element of this policy; however the infrastructure to be provided is not specific to walking and cycling and suggests all highways alternatives. Since the NSP needs to be read as a whole, it is clear that the infrastructure supported through this policy is sustainable transport, as clarified by the development management policies under SP5. The Healthy High Streets programme has the opportunity for improvements to promote sustainable transport and improve air quality, as well as the Bakerloo Line extension and other projects to promote improvements to stations, walking, cycling and public transport accessibility.
<b>IIAO 17</b>	To provide the necessary	✓✓	✓✓	It seeks to ensure infrastructure both social and physical, is in place to

	infrastructure to support existing and future development			support the occupants of current and future developments throughout their lifetime. This will be achieved through hared servicing option, working with a range of infrastructure providers, neighbouring boroughs and utility companies.
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IP3 – Community infrastructure levy (CIL) and Section 106 planning obligations				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Mitigating the impacts of development by requiring redistribution of developer funds to areas prioritised by the local community. The policy seeks to ensure development is demonstrated to be viable and deliverable.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	Costs of buildings schools, health and community facilities are included in CIL funding schedule. S106 obligations are required through other policies in the plan for example creation of jobs in the construction and final stages of development (P27).
IIAO 3	To improve the health of the population	✓✓	✓✓	Costs of buildings schools, health and community facilities are included in CIL funding schedule.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Designing out crime is often secured as part of infrastructure spending policy.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	CIL infrastructure spending and funds are spent on projects listed in the Community Infrastructure Project Lists (CIPL) or where relevant on projects listed in an adopted neighbourhood plan. CIPL are revised annually based on priorities changing in order to support the amount of new development planned. It directs funds to the priorities of local communities.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Securing mitigation where schemes do not meet the development plan target for reducing carbon dioxide emissions is evident through this policy. Carbon offsetting projects will be funded by the carbon offset fund.
IIAO 7	To improve the air quality	✓✓	✓✓	CIL Measures to improve and address negative impacts on air quality and noise
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓✓	✓✓	S106 measures can include a waste management plan. These describes in detail the amount and type of waste from a construction project and how it will be reused, recycled or disposed of.

<b>IIAO 9</b>	To encourage sustainable use of water resources	✓✓	✓✓	Sustainable Urban Drainage Systems (SUDS), non-potable water networks can be included in S106 agreements to ensure that sustainable building practices are undertaken.
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	✓✓	✓✓	Infill development and wholesale redevelopment will result in a higher density and a more efficient use of land.
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	A contribution towards works to be carried out by contractors employed by Southwark Council. Where appropriate, works to a development's surrounding area include: footpaths and carriageways, street lighting, tree planting, green chains, urban parks, surrounding footways and streetscape, maintenance payments, community safety initiatives, public art, landscaping, wildlife habitats and others as required.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Conservation, creation and enhancement of areas of plan and wildlife habitat can be required.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓✓	Protected restrictions on the use of land, public access and public rights away supports MOL, BOL and OOS designations. Conservation, creation and enhancement of areas of plan and wildlife habitat can also be required.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓✓	✓✓	Requiring flood risk assessments assure that vulnerability to flood is reduced.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Secures good quality housing by ensuring that Residential Design Standards are achieved throughout the design, development and construction processes. The policy seeks to ensure development is demonstrated to be viable and deliverable, and prioritises the delivery of social rented and intermediate housing if all policy requirements cannot be viably supported by a specific development.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓✓	✓✓	Site specific transport measures can be secured through S106 agreements.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓✓	✓✓	Provide alternative mechanism for funding of strategic infrastructure, which is the Community Infrastructure Levy (CIL). CIL infrastructure spending and funds are spent on projects listed in the Community Infrastructure Project Lists (CIPL) or where relevant on projects listed in an adopted neighbourhood plan. CIPL are revised annually based on priorities changing in order to support the amount of new development

				planned. It directs funds to the priorities of local communities.
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IP4 – Enforcement against unlawful development				
I/A Objective	Description	Averaged Grading	Sub grading	Commentary
I/AO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Enforcement ensures that the development management policies provided in the Local Plan are adhered with during development, which safeguards the wellbeing of existing and future residents and aligns development with Fairer Future Commitments and the Council Plan as part of a grant in planning permission. It ensures that unlawful development does not occur which could jeopardize the wellbeing of existing and future residents in the borough. It ensures that commitments towards equality and protected characteristics are supported to ensure that buildings are satisfactorily managed and safely developed, which supports the usage of all members of the community.
I/AO 2	To improve the education and skill of the population	N/A	N/A	
I/AO 3	To improve the health of the population	N/A	N/A	
I/AO 4	To reduce the incidence of crime and the fear of crime	✓✓	✓✓	Enforcement minimises the instances of crime or breach in planning permission.
I/AO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	Enforcement ensures that certain standards of design are adhered to, which promotes quality of place-making.
I/AO 6	To reduce contributions to climate change	N/A	N/A	
I/AO 7	To improve the air quality	N/A	N/A	
I/AO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
I/AO 9	To encourage sustainable use of water resources	N/A	N/A	
I/AO 10	To maintain and enhance the quality of land and soils	N/A	N/A	

<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	✓✓	✓✓	Enforcement ensures that demolition or unlawful acts on a conservation area or listed building is enforced upon, preserving the landscape or townscape.
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓✓	✓✓	Enforcement ensures that demolition or unlawful acts on a conservation area or listed building is enforced upon.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	.
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	The key objective to enforcement against unlawful development is to improve the supply of housing, particularly quality, affordable housing.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

IP5 – Compulsory Purchase Order (CPO)				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	Compulsory purchase orders are only granted by central government if the regeneration scheme that is proposed meets the economic wellbeing of the area of administrative responsibility (e.g the boundary of a London borough). Whilst this is the intent, it must be closely monitored as to whether short-term socio-economic levels are maintained.
IIAO 2	To improve the education and skill of the population	✓	✓	Regeneration in a strategically located area can indirectly improve the access to education and skill of the local population if the case presented is compelling in the public interest as required by the Compulsory Purchase Order (CPO).
IIAO 3	To improve the health of the population	✓	✓	Regeneration in the public interest, as required by Compulsory Purchase Order (CPO), should indirectly improve health impacts of the population.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	x	x	The Council provides multiple forms of support to property owners and residents who are at risk of being displaced by the CPO process, including the provision of compensation. Most recently, Aylesbury and Heygate have notably been large CPOs approved by Cabinet. CPO remains the last resort for the Council in securing vacant possession of land for regeneration.
IIAO 6	To reduce contributions to climate change	?	?	Whilst new development can be built to deliver net zero carbon performance, the demolition of buildings as a result of a CPO has an inherent carbon cost. Whether the benefits of improved energy performance building standards in the long-term outweighs short-term cost will be monitored.
IIAO 7	To improve the air quality	?	?	In the short-term demolition and construction has harmful impact on air quality; however this can be outweighed by long-term benefit of improved air quality standards in design. These need to be monitored on

				a case-by-case basis.
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	?	?	CPO is a legal tool used as a last resort when other options such as negotiation, have been exhausted. CPO may be necessary in instances to meet planning and regeneration objectives such as building new quality homes including social rented and intermediate homes.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

IP6 – Monitoring Development				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	By monitoring development through annually updated AMR we are able to adjust policies that are not working most effectively to provide desired results. This information can be used to improve planning policies and prepare more effective documents which have indirect effects on achieving desired outcomes of tackling poverty and encouraging wealth creation. Collecting information from applicants and developers and improving digital technology to assist with monitoring will improve proactive monitoring. The addition of the NSP monitoring table sets clear expectations for how the policies will be monitored over the plan period including monitoring for employment and town centre policies.
IIAO 2	To improve the education and skill of the population	✓	✓	We are able to ensure that progress is being made in new educational facilities being delivered to the community through development, which can improve the education and skill of the population. This monitoring indicates that needs, including good quality schools, health facilities and community centres are being created at sufficient pace. The new NSP Monitoring Table includes criteria for monitoring the education, employment, skills and training policies in the NSP.
IIAO 3	To improve the health of the population	✓	✓	Health infrastructure is included in development that is monitored using AMR data. This indirectly ensures that community needs are being met through adequate community infrastructure development. The new NSP Monitoring Table includes criteria for monitoring the health policies in the NSP.
IIAO 4	To reduce the incidence of crime and the fear of crime	✓	✓	The new NSP Monitoring Table includes criteria for how the designing out crime policy will be monitored including - Number of schemes to secured by design principles and certification granted, crime rates and perceptions of safety.
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓	Monitoring development is important to ensure members of the public can access information easily about how the policies are making a difference. The addition of the NSP monitoring table sets clear expectations for how the policies will be monitored over the plan period.

IIAO 6	To reduce contributions to climate change	✓✓	✓✓	The new NSP Monitoring Table includes criteria for how the net zero carbon target will be monitored. This includes the carbon emissions baseline (tons of carbon) and the energy efficiency of major development (%), % of carbon reduction and energy efficiency of small schemes where an energy statement has been submitted, residential 100% reduction on Part L Building regs (major development, %), non-residential 40% reduction on Part L Building regs (major development), number of energy centres (major schemes), projected and annual greenhouse gas emissions (major development), energy storage, total fuel consumption by source, SAP ratings, be lean/be green/be clean/be seen monitoring, Production of GWh of energy from renewable sources, use of PV in Southwark, tonnes of carbon offset and total contributions, whole lifecycle carbon assessment, Energy Consumption by Sector, fuel poverty, carbon reduction made by DHNs, District heat networks and BREEAM standards.
IIAO 7	To improve the air quality	✓	✓	The new NSP Monitoring Table includes criteria as follows, Levels of NO2 and PM10 and PM2.5, Population exposed to levels of NO2 above the annual average objective limits, Development within air quality focus areas or for more vulnerable groups including older people and children, Applications achieving or exceeding air quality neutral Standards, air quality offset contributions total.
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource	✓	✓	The new NSP Monitoring Table includes criteria as follows, Circular Economy statements, tonnes waste reduced, compost and recycling rate for Southwark, % of waste going to landfill, municipal waste diverted from landfill, London Plan waste apportionment target, waste management sites in Southwark.
IIAO 9	To encourage sustainable use of water resources	✓	✓	The new NSP Monitoring Table includes criteria as follows, Domestic Water demand (litres used per day per person), % of applications achieving the safe to drink water use of no more than 105 litres per person per day, excluding an allowance of 5 litres or less per person per day for external water use.
IIAO 10	To maintain and enhance the quality of land and soils	✓	✓	The new NSP Monitoring Table includes criteria as follows, number of potentially contaminated sites and remediation.
IIAO 11	To protect and enhance quality of landscape and townscape	✓	✓	The new NSP Monitoring Table includes criteria for monitoring the townscape and design policies in the NSP.

<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	✓	✓	The new NSP Monitoring Table includes criteria for monitoring the historic environment and cultural policies in the NSP.
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	✓	✓	The new NSP Monitoring Table includes criteria for monitoring the open space, biodiversity and green infrastructure policies in the NSP.
<b>IIAO 14</b>	To reduce vulnerability to flooding	✓	✓	The new NSP Monitoring Table includes criteria for monitoring the flooding policies in the NSP. Monitoring planning permissions on flood or water quality grounds, reflecting the borough's positive approach to protecting the flood plain from inappropriate development.
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓	✓	The new NSP Monitoring Table includes criteria for monitoring the housing policies in the NSP. The Council Stock Condition survey indicates the number of council-owned dwellings that do not meet the Decent Homes Standard. This is introduced in the baseline report for us to make a more informed decision as to whether policy is improving the quality of homes.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	✓	✓	The new NSP Monitoring Table includes criteria for monitoring the housing policies in the NSP, as well as the Southwark Movement Plan and monitoring criteria.
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	✓	✓	The new NSP Monitoring Table includes criteria for monitoring the infrastructure policies in the NSP, including utilities and transport infrastructure.

IP7 – Statement of Community Involvement				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓	✓	By working together and allowing communities to be involved in the development of planning policy and guidance documents, there is a greater likelihood that large strategic issues related to poverty or barriers to wealth creation are tackled.
IIAO 2	To improve the education and skill of the population	N/A	N/A	
IIAO 3	To improve the health of the population	N/A	N/A	
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓	✓✓	By working together and allowing communities to be involved in the development of planning policy and guidance documents, there is a greater likelihood that large strategic issues are tackled in a manner that is beneficial or preferred by the community. We monitor our consultation on our planning documents and review it at each stage of consultation, highlighting the results in our consultation statements to help us improve our consultation techniques to engage more local residents and businesses. This provides meaningful opportunities for everyone to participate fully in our planning decisions.
			✓	We consult many different groups and organisations on our planning documents public consultations and identify 'hard to reach' groups to target our consultation. However, we cannot ensure that every group has been consulted with for every consultation. Therefore there may be some groups that are unintentionally excluded or left out if they are not provided with the information that they are able to comment on our documents. Furthermore, there may be other cultural, language or access barriers preventing them from engaging. The Council will continue collecting information on the demographic profile of people who are engaging with planning documents and work to ensure that these engagements span to stretch and include all members of the

				community. This is described in the Statement of Community Involvement under the heading 'Monitoring and Feedback' which lays out how we feedback and how we monitor on plan-making and development management within the local authority. The Development Consultation Charter also works to improve consultation from the early stages of plan-making or planning applications and setting clear expectations for the levels of engagement.
<b>IIAO 6</b>	To reduce contributions to climate change	N/A	N/A	
<b>IIAO 7</b>	To improve the air quality	N/A	N/A	
<b>IIAO 8</b>	To avoid waste and maximise, reuse or recycle waste arising as a resource	N/A	N/A	
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	Community engagement with planning documents allows the Council to receive feedback from local communities on the quality of housing supply and stock. This way we are able to respond more quickly and identify local need.
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary	N/A	N/A	

	infrastructure to support existing and future development			
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IP8 – Local Development Scheme				
IIA Objective	Description	Averaged Grading	Sub grading	Commentary
IIAO 1	To tackle poverty and encourage wealth creation	✓✓	✓✓	By setting out the schedule to delivering a vision and framework for the future development of an area, it is possible to address future needs and opportunities in relation to housing, the economy, community facilities and infrastructure.
IIAO 2	To improve the education and skill of the population	✓✓	✓✓	By setting out the schedule to delivering a vision and framework for the future development of an area, it is possible to address future needs and opportunities in relation to housing, the economy, community facilities and infrastructure.
IIAO 3	To improve the health of the population	✓✓	✓✓	By setting out the schedule to delivering a vision and framework for the future development of an area, it is possible to address future needs and opportunities in relation to housing, the economy, community facilities and infrastructure.
IIAO 4	To reduce the incidence of crime and the fear of crime	N/A	N/A	
IIAO 5	To promote social inclusion, equality, diversity and community cohesion	✓✓	✓✓	By setting out the schedule to delivering a vision and framework for the future development of an area, it is possible to address future needs and opportunities in relation to housing, the economy, community facilities and infrastructure.
IIAO 6	To reduce contributions to climate change	✓✓	✓✓	Local Development scheme set out a schedule for delivering a vision and a framework for the future development of the area and are a basis for safeguarding the environment, adapting to climate change and securing good design.
IIAO 7	To improve the air quality	N/A	N/A	
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising	N/A	N/A	

	as a resource			
<b>IIAO 9</b>	To encourage sustainable use of water resources	N/A	N/A	
<b>IIAO 10</b>	To maintain and enhance the quality of land and soils	N/A	N/A	
<b>IIAO 11</b>	To protect and enhance quality of landscape and townscape	N/A	N/A	
<b>IIAO 12</b>	To conserve and enhance the historic environment and cultural assets	N/A	N/A	
<b>IIAO 13</b>	To protect and enhance open spaces, green corridors and biodiversity	N/A	N/A	
<b>IIAO 14</b>	To reduce vulnerability to flooding	N/A	N/A	
<b>IIAO 15</b>	To provide everyone with the opportunity to live in a decent home	N/A	N/A	
<b>IIAO 16</b>	To promote sustainable transport and minimise the need to travel by car	N/A	N/A	
<b>IIAO 17</b>	To provide the necessary infrastructure to support existing and future development	N/A	N/A	

## Appendix 8: Monitoring indicators against sustainability objectives

The extent to which each proposed monitoring indicator relates with and reflects the sustainability effects has been examined, to ensure the monitoring regime is robust and effective in identifying any trends in the sustainability effects, both predicted and unforeseen, of the local plan where preventative or mitigation measures can be undertaken. The results are set out in the following table.

Baseline indicators	Sustainability objective(s) which can contribute to effecting the positive change																
	1 To tackle poverty and encourage wealth creation	2 To improve the education and skill of the population	3 To improve the health of the population	4 To reduce the incidence of crime and the fear of crime	5 To promote social inclusion, equality, diversity and community cohesion	6 To mitigate impacts of and adapt to climate change	7 To improve the air quality of Southwark	8 To avoid waste and maximise, reuse or recycle waste arising as a resource	9 To encourage sustainable use of water resources	10 To maintain and enhance the quality of land and soil	11 To protect and enhance quality of landscape and townscape	12 To conserve and enhance the historic environment and cultural assets	13 To protect and enhance open spaces, green corridors and biodiversity	14 To reduce vulnerability to flooding	15 To provide everyone with the opportunity to live in a decent home	16 To promote sustainable transport and minimise the need to travel by car	17 To provide the necessary infrastructure to support existing and future development
<b>Equality</b>																	
Index of multiple deprivation	√	√	√	√	√										√		
The Income Deprivation Affecting Children Index 2019 (IDACI)	√	√	√	√	√										√		
The Income Deprivation Affecting Older People Index 2019 (IDAOP)	√	√	√	√	√										√		
<b>Housing</b>																	
Provision of new homes against the demand set out in Southwark SHMA 2019	√				√										√		√
Provision and percentage of new affordable homes against the demand set out in Southwark SHMA 2019	√		√	√	√										√		√
Provision of new family-sized social housing against the demand set out in Southwark SHMA 2019	√		√	√	√										√		√
<b>Social cohesion</b>																	
The percentage of residents being an active member of their community		√	√	√	√												√
The percentage of residents feeling they contribute to the local economy	√	√	√	√	√										√		√
The percentage of residents volunteering in Southwark Council		√	√		√												√
The percentage of residents who feel wholly or partly positive about change in the borough	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√
The percentage of residents who have personally benefitted from change	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√
Local perceptions of neighbourliness and how well local people get on well together (emerging) <sup>1</sup>	√		√	√	√												
The local perceptions of the ability to have their voice heard and influence decisions (emerging) <sup>2</sup>	√	√			√												
<b>Public health and well-being</b>																	
Life expectancy at birth for males and females	√	√	√	√	√	√	√						√	√	√	√	√
Healthy life expectancy at birth for males and females	√	√	√	√	√	√	√						√	√	√	√	√
The number of excess winter deaths	√	√	√		√	√									√		√
The percentage of adult carers who have as much social contact as they would like	√		√	√	√										√	√	√

<sup>1</sup> Available when social research for Southwark's Social Regeneration Charter is published

<sup>2</sup> Available when social research for Southwark's Social Regeneration Charter is published

The percentage of physically active adults	√	√	√	√							√		√		√	√	√
The number and percentage of reception and Year 6 children who are overweight (including obesity)	√	√	√	√							√		√		√	√	√
<b>Education, skills and training</b>																	
The number and percentage of 16-17 year olds not in education, employment or training (NEET) or whose activity is not known	√	√	√	√							√		√		√	√	√
The number and percentage of people aged 16-64 attaining a NVQ Level Four or higher	√	√	√	√							√		√		√	√	√
The number and percentage of residents with no qualifications	√	√	√	√							√		√		√	√	√
The ranking in Education and Skills deprivation	√	√	√	√							√		√		√	√	√
The number of apprenticeships created within the borough	√	√	√	√							√		√		√	√	√
<b>Safety</b>																	
Crime rate per 1000 of the population for key offences	√	√	√	√	√								√		√		√
The total number of key offences	√	√	√	√	√								√		√		√
The ranking in crime deprivation	√	√	√	√	√								√		√		√
The number of pedestrians' cyclists' casualties	√	√		√	√		√						√		√	√	√
The number of fatal and serious casualties of pedestrians and cyclists	√	√		√	√		√						√		√	√	√
The local perception of safety and crime	√	√		√	√		√						√		√	√	√
<b>Economy and employment</b>																	
Number of employee jobs	√	√			√							√	√		√	√	√
Number of micro and small-to-medium sized enterprises	√	√	√		√										√	√	√
Percentage of unemployed population	√	√	√		√										√	√	√
<b>Retail and town centres</b>																	
Percentage of takeaways outlets within a walking distance (400m) of a secondary school	√	√	√														√
Primary shopping frontage vacancy rates											√						
Secondary shopping frontage vacancy rates											√						
<b>Energy and Climate Change</b>																	
Energy consumption per sector						√	√										
Domestic consumption per capita of natural gas						√	√										
Domestic consumption per capita of electricity						√	√										
Local carbon dioxide emissions (tonnes of CO2)						√	√										
Number of households experiencing fuel Poverty	√	√			√										√		
<b>Air Quality</b>																	
Concentration level of NO2 and PM10 (with PM2.5 to be published)						√	√						√		√	√	√
Percentage population exposed to levels of NO2 above the annual average objective limits						√	√						√		√	√	√
<b>Transport</b>																	
Journey to work by mode		√	√	√	√	√	√						√			√	√
Frequency of Cycling as mode of Transport		√	√	√	√	√	√						√			√	√
Number of people killed or seriously injured in road accidents		√	√	√	√	√	√						√			√	√
<b>Biodiversity</b>																	
Number of SINC Sites											√	√	√	√	√		√
Number of Local Nature Reserves											√	√	√	√	√		√
Number of New Protected Sites											√	√	√	√	√		√
<b>Open Spaces/soil</b>																	
Open Spaces (hectares per 1,000 people)											√	√	√	√	√		√
Park provision (hectares per 1,000 people)											√	√	√	√	√		√

Satisfaction with the quality of open space										√	√	√	√	√			√
Satisfaction with natural greenspace provision										√	√	√	√	√			√
Number of Allotments (Community gardens)										√	√	√	√	√			√
<b>Flood Risk, Water Resources and Quality</b>																	
Domestic Water Demand across the entire borough, as a proxy measure of water consumption (expected)										√							
Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence & water quality grounds										√					√		
Quality of water at consumer's tap (zones) – against National Standards (number of tests failed) Thames Water Aggregated										√					√		
<b>Waste management</b>																	
Recycling and composting rate (%)		√							√								
Amount of municipal waste diverted from landfill (recovery rate %)		√							√								
<b>Noise management</b>																	
The rate of complaints about noise												√				√	
<b>Play facilities</b>																	
Number of open spaces with play facilities							√					√	√	√			
Level of satisfaction with children's play spaces							√					√	√	√			
<b>Quality in Design and Conservation of Historic Environment</b>																	
Number of Historic environment assets												√	√				

## Appendix 9: Baseline Indicators

Summary of baseline indicators as taken from Appendix 3 – Baseline Data. These indicators will be monitored on an ongoing basis as part of the IIA.

### Social Conditions

#### Population

Baseline data	Southwark			Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
% of population demographic	White	Black	Asian	-	-	-	Southwark Profile, Southwark website- source: GLA population projections (ONS mid- year 2010)	2015 (2010)	Annually
	54% (65.9%)	27% (17.4%)	6% (8.4%)						
	Mixed		Chinese / Other						
	6% (3.8%)		8% (4.5%)						
% of population that are:	Religious	Disabled	LGBT	-	-	-	Population by Religion, Borough - ONS 2017 (ONS mid-year 2010)	2017 (2010)	Annually
	<b>Christian</b> 52%(61.6%)	(5% claiming benefits)	(16.464)						
	<b>Muslim</b> 6.8% (6.9%)								
	<b>Buddhist</b> - (1.1%)								
	<b>Hindu</b> - (1.1%)	Residents identifying as disabled							
	<b>Jewish</b> - (0.4%)	(18.2% of working-aged people (16-64))							
	<b>Sikh</b> (0.2%)								

	<b>Other faith</b> (0.4%)							
	<b>No faith</b> 39.2% (18.5%)							

## Equality

Baseline data	Southwark	Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
Index of multiple deprivation	43 <sup>rd</sup> most deprived out of 317 local authorities in England; 8 <sup>th</sup> most deprived among 14 inner London boroughs; 9 <sup>th</sup> out of 33 local boroughs in London	Lower	-	-	English Indices of Deprivation 2019	Sep 2019	Annually
The Income Deprivation Affecting Children Index 2019 (IDACI)	81 out of 166 lower-layer super output areas (LSOAs) fell into the 20% most deprived across the country	Decrease	-	-	English Indices of Deprivation 2019	Sep 2019	Annually
The Income Deprivation Affecting Older People Index 2019 (IDAOP)	113 out of 166 lower-layer super output areas (LSOAs) fell into the 20% most deprived across the country	Decrease	-	-	English Indices of Deprivation 2019	Sep 2019	Annually

## Social cohesion

Baseline data	Southwark	Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
Active member of their community	1 in 4 people	increase	-	-	Southwark Conversation	2018	Annually
Feeling of contributing to the local economy	1 in 5 people	Increase	-	-	Southwark Conversation	2018	Annually
Volunteer in Southwark	1 in 7 people	Increase	-	-	Southwark Conversation	2018	Annually
Work in the borough	1 in 6 people	-	-	-	Southwark Conversation	2018	Annually
Percentage of residents who feel wholly or partly positive about change in the borough	70%	Increase	-	-	Southwark Conversation	2018	Annually

Percentage of residents who have personally benefitted from change in the borough	52%	Increase	-	-	Southwark Conversation	2018	Annually
How positive/happy residents feel about change in Southwark	18% mentioned community	-	-	-	Southwark Conversation	2018	Annually

## Housing

Baseline data	Southwark		Southwark's maintenance target	London		National (England)	Source	Most recent data
Average house price	£476,597 (March 2019)		-	Inner London £642,127	London-wide £517,110	£243,259	Housing in London 2019 Tables	Oct 2019
Household weekly income	Median income 2019		-	£589.4		£482	Earnings by place of residence (NOMIS)	2019 (Provisional)
	£623							
Ratio of median house price in borough to median annual residence based earnings	15.28 (2017)	15.19 (2018)	Decrease	Inner London 17.08	London-wide 13.09	8	ONS – House price to residence-based earnings ratio	2018
Average private house rent (advertised)	April 2019		-	South East		-	Housing Market Trends Bulletin Southwark No.63	Jun 2019
	£2,735 (two-bed unit)	£782 (room rent)		£1,648 (2-bed unit)	£687 (room rent)			
No. of households on housing register	12,597 (March 2015)		Decrease	-		-	Southwark Housing Strategy to 2043	2015
No. and % of council housing in the borough	37,885 units	30%	-	17.1%		-	Southwark Key Housing Data 2015/2016	Oct 2015
Stock of housing	16,918 units		-	-		-	Southwark	Oct 2015

associations	1-bed 36%	2-bed 31%	3-bed 20%				Key Housing Data 2015/2016	
No. and % of private dwellings	2016 figures			-	76.8%	82.7%	Tenure of Households by Borough, Office for National Statistics	Nov 19
	76,500 units	59% of total homes						
% of Owner-occupied and private rent (of all tenure)	2016 figures			-	Owner-occupied 51.2%	Private rent 25.6%	Tenure of Households by Borough, Office for National Statistics	Nov 19
	Owner-occupied 36.6%	Private rent 22.5%						
Housing typology	Majority of private dwellings are flats at 48%			-	37.1%	-	Southwark Key Housing Data 2015/2016	Oct 2015
Age of private dwellings	43% constructed before 1919; 43% after 1964			-	-	-	Southwark Key Housing Data 2015/2016	Oct 2015
Southwark's housing target	<u>Adopted London Plan (2016):</u> 27,362 units between 2015-2025			Increase supply	-	-	Draft New London Plan	Nov 2019
	<u>Draft New London Plan (July 2019):</u> 25,540 units between 2019 and 2029, including 8,000 units on small sites							
	<u>The inspector's report (Oct 2019):</u> 23,550 units, of which 6010 to be completed on small sites							
Net approved C3 dwellings (2004 – 2019)	42,937 units (including conventional housing and non-conventional equivalent units)			Increase supply	-	-	London Development Database (LDD)	Nov 2019
Net completed C3 dwellings (2004 – 2019)	23,521 units (including conventional housing and non-conventional equivalent units)			Increase supply	-	-	London Development Database (LDD)	Nov 2019
Net affordable homes	Approved: 9,924 units (48%)			Increase	-	-	London	Nov 2019

(2004 – 2019)	Completed: 6,416 units (33%)								Development Database (LDD)	
% of Local Authority as the housing provider	23% (2016-2017)					Increase	-	-	London Development Database (LDD)	Nov 2019
Minor developments (2004 – 2019)	Approved: net 5,567 units (2,275 schemes)					-	-	-	London Development Database (LDD)	Nov 2019
	Completed: net 3,711 units (16% of total new homes)									
Student accommodation (2014 – 2017)	Approved: net 8 bedrooms					-	-	-	London Plan Annual Monitoring Report 12-14	Sep 2018
	Completed: 1,221 bedrooms									
Additional general housing needs	South East SHMA (2014): 1,647 units					Increase supply	-	-	South East London Strategic Housing Market Assessment (SHMA, (2014); Southwark's SHMA (2019)	Jul 2019
	Southwark SHMA (2019): 2,932 units									
Net affordable housing needs per year	Backlog needs from 2,934 concealed households					Increase supply	-	-	Southwark's SHMA (2019)	Jul 2019
	Backlog needs from 6,745 overcrowded households									
	Backlog needs from 2,336 homeless households who are currently living in temporary accommodation									
	3,943 newly forming households per annum									
	205 existing households falling into need for affordable homes per year									
	Annual supply of affordable homes: 1,436 units Net additional affordable homes need: 2,077 units									
Bedroom requirement by tenure	<b>(shortage/ demand: -) (oversupply: +)</b>	<b>1 bed</b>	<b>2 beds</b>	<b>3 beds</b>	<b>4 beds</b>	Increase supply	-	-	Southwark's SHMA (2019)	Jul 2019
	<b>Social rent and sub-social rent</b>	+200 units	-659 units							
	<b>Intermediate housing</b>	Undersupply								
	<b>Market housing</b>	-20%	-30%	-34%	-16%					

Older households and those with disabilities and wheelchair requirements	Aged 65: 79% increase by 2039 (13% of Southwark population)	Increase supply	-	-	Southwark's SHMA (2019)	Jul 2019
	Aged 65 with dementia: 2,369 by 2030					
	Older people with mobility disabilities: 7,690 in 2035					
	Additional need for care beds: 867 by 2029					
	Additional specialist elderly accommodation: 780 units by 2029 (72% sheltered and 14% extra care)					
Students	21,000 students aged 20 or over residing in the borough during term time	-	-	-	Southwark's SHMA (2019)	Jul 2019

## Education, skills and training

Baseline data	Southwark		Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
<b>NEETs</b> No and % of 16-17 year olds not in education, employment or training or whose activity is not known	520	9.9%	Decrease	4.8%	5.5%	NEET and participation: local authority figures, Department for Education	Jun 2019	Annually
No. and % of residents who have attained NVQ4 and above	149,200	64.6%	Increase	53.1%	39.3% (Great Britain)	NOMIS, Labour Market Statistics	Dec 2018	Annually
No. and % of residents with no qualification	13,200	5.7%	Decrease	6.6%	7.8 (Great Britain)	NOMIS, Labour Market Statistics	Dec 2018	Annually
No. of apprenticeships created within the borough	842 (41% of all apprenticeships created by London boroughs in 2016-2017)		Create another 2,500 Southwark apprenticeships	-	-	Southwark Skills Strategy	Jun 2018	Annually
Education and skills deprivation (the higher rank the more deprived)	8 <sup>th</sup> out of 14 (Inner London)		Decrease	22 <sup>nd</sup> out of 33 (London Wide)	262 <sup>nd</sup> out of 317 (National)	English indices of deprivation, MHCLG	Sep 2019	Annually
Provision of school places in the borough (Sep 2019)	Primary school	3,760 primary reception place, equivalent to 125 forms of entry	-	-	-	Pupil Place Planning, Southwark Council	Oct 2019	As available
		26,995 year R to 6 primary places, equivalent to 900 primary classes						
	Secondary school	3,476 Year 7 places (116 FE)						

		16,098 for Year 7-11 (537 classes)						
SEND school attendance (Primary, secondary and 16 plus)	Primary schools: 4,100 children	Secondary schools + post-16: 2,800 children	-	-	-	Pupil Place Planning, Southwark Council	Oct 2019	As available
Provision of free early education places (2-4 years old)	8,119 (2017)	7,800 (2018)	-	-	-	Statistics: childcare and early years, Department for Education	Sep 2019	As available
Demand for state-funded school places (2019- 2028)	Primary school: 21,912 per year	Secondary school: 14,641 per year	-	-	-	2018 School place demand projections, Greater London Authority	Jan 2018	As available
Demand for early year places affected by:	Estimated number of 20,954 children under 5 (2019)	Estimated number of 23,178 children under 5 (2039)	-	-	-	Childcare Sufficiency Assessment, Southwark	Sep 2019	As available
No. of libraries in the borough	12		-	-	-	Southwark Library and Heritage Strategy 2019- 2022	2019	As available

## Health and well-being

### Healthy life expectancy

Baseline data	Southwark		Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
Life expectancy at birth	Male life expectancy at birth	78.9 years	Increase	80.5 years	63 years	Public Health Outcomes Framework, Public Health England	2015 - 2017	Annual
	Female life expectancy at birth	84.4 years	Increase	84.3 years	64 years			
Healthy Life expectancy at birth	Male	62.4 years	Increase	63.9 years	63.4 years	Public Health Outcomes Framework, Public Health England	2015 - 2017	Annual
	Female	64.6 years	Increase	64.6 years	63.8 years			
Number of Excess Winter Deaths	45 (10.2%)		Decrease	27.1%	30.1%	Public Health Outcomes Framework, Public Health England	Aug 2017 – Jul 2018	Annually

Health deprivation and Disability (the higher rank the more deprived)	10 <sup>th</sup> out of 14 (inner London boroughs)	Decrease	28 <sup>th</sup> out of 33 (London wide)	211 <sup>th</sup> out of 317 (National)	English Indices of Deprivation	Sep 2019	Annual
Percentage of adult carers who have as much social contact as they would like	39.8%	Increase	35.6%	35.5%	Public Health Outcomes Framework, Public Health England	2016 - 2017	Annual
Percentage of adult social carers who have as much social contact as they would like	38.5%	Increase	41.4%	46%	Public Health Outcomes Framework, Public Health England	2017 – 2018	Annual
Causes of the gap in life expectancy: Cardiovascular Disease, Cancer and Respiratory Disease	Male: 58%	-	-	-	Joint Strategic Needs Assessment Factsheet 2019-2020, Southwark	Sep 2019	As available
	Female: 48%						

Percentage of physically active adults	73.8%	Increase	66.4%	66.3%	Public Health Outcomes Framework, Public Health England	2017 – 2018	Annual
Number and percentage of reception children who are overweight and obese	769 (25.4%)	Decrease	37.7%	34.3%	Public Health Outcomes Framework, Public Health England	2017 – 2018	Annual
Number and percentage of Year 6 children who are overweight and obese	1,145 (39.8%)	Decrease	37.7%	34.3%	Public Health Outcomes Framework, Public Health England	2017 - 2018	Annual
Mental health	Estimate 47,600 in the borough suffer from a common mental disorder	-	1 every 5 adults	1 every 6 adults	Adult Psychiatric Morbidity Survey 2014	2014	As available

Projected ageing population	79% increase in residents aged 65 or more by 2039, reaching 48,000 at 13% of the Southwark population (92% increase in those over 75 and 87% growth in those over 85)	-	-	-	Southwark SHMA 2019	2019	As available
Projected 65 year-old or above residents with dementia	1,772 by 2020; 2,369 by 2030	-	-	-	Southwark SHMA 2019	2019	As available

## Safety

Baseline data	Southwark			Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
Recorded crime per 1000 population for headline offences	120 (2018-2019), 6 <sup>th</sup> highest among 13 inner London boroughs, 6 <sup>th</sup> in London			Decrease	99	84	Recorded crime data by Community Safety Partnership area, ONS	Jul 2018 - Jun 2019	Annual
No. Crimes recorded per annum	38,113 (4th highest rating of London boroughs)			Decrease; Lower rating	-	-	Recorded crime data by Community Safety Partnership area, ONS	Jul 2018 - Jun 2019	Annual
No. of crime types recorded	<b>Theft offences</b>	<b>Violence against the person</b>	<b>Robbery</b>	Decrease	-	-	Recorded crime data by Community Safety Partnership area, ONS	Nov 2018 – Oct 2019	Annual
	16042	8,879	2,119						
	<b>Sexual offences</b>	<b>Drug offences</b>	<b>Criminal damage and arson</b>						
	856	2,156	2,225						
	<b>Public order offences</b>	<b>Possession of weapons offences</b>	<b>Miscellaneous crimes against society</b>						

	1,979	408	360							
Crime deprivation (the higher rank the more deprived)	7 <sup>th</sup> out of 14 inner London boroughs; 9 <sup>th</sup> out of 33 London boroughs; 37 <sup>th</sup> within England; 25 out of 166 Lower-layer Super Output Areas (LSOA) within Southwark are among the 10 <sup>th</sup> most deprived area within England			Lower ranking	-	-	English Indices of Deprivation	Sep 2019	Annual	
Total No. of casualties in Southwark	Pedestrians: 234 (-6% from 2017)	Cyclists: 361 (12% from 2017)	Reduce to zero	175	144	-	Casualties in Greater London - Transport for London	2018	Annual	
Fatal and serious casualties on road	189			Reduce to zero	123		-	Casualties in Greater London - Transport for London	2018	Annual

## Economic conditions

### Economy and employment

Baseline data	Southwark	Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
Number of employee jobs	235,000	Increase	-	-	Nomis Labour Market Statistics, Local Authority Profile	2017	Annually
Number of micro and small-to-medium sized enterprises	99% of the total business in the borough, equating a total of 15,905 micro-SMEs	Increase			Nomis Labour Market Statistics, Local Authority Profile	2018	Annually
Number of economically active and inactive populations	Economically active: 41,700 14,700 Students (35% of economically inactive population)	-	-	-	Nomis Labour Market Statistics, Local Authority Profile	2019	Annually

Gender breakdown of employed population	81% economically active and are in employment: 81% males / 74% females			-	-	-	Nomis Labour Market Statistics, Local Authority Profile	2019	Annually
Percentage of unemployed population	5.4% unemployed	4% claiming out-of-work benefits	3.8% claiming Universal Credit	Decrease	4.9% unemployed	4.1%	Nomis Labour Market Statistics, Local Authority Profile	2019	Annually

## Retail and town centres

Baseline data	Southwark			Southwark's maintenance target	London	National	Source	Most recent data	Frequency of collection
Percentage of takeaways outlets within a walking distance (400m) of a secondary school	86 out of 302 (30%) takeaways (situated in ward areas with the prevalence of excess weight) are within a 400m walking distance of a secondary school			Decrease	-	-	Southwark Public Health, <i>P45 Hot Food Takeaways – Review of the evidence</i> , Southwark Place & Health Improvement Section	2018	As available
Primary shopping frontage vacancy rates	7 out of 15 having 0%			Decrease	-	-	Protected Shopping Frontages, Southwark	2018	As available
Secondary shopping frontage vacancy rates	11 out of 38 having 0%			Decrease	-	-	Protected Shopping Frontages, Southwark	2018	As available
Existing commercial floorspace in town centres, district centres and local centres	208,666 gross retail floorspace (270,500 sqm including food and beverage)			-	-	-	Southwark Retail Study, Nathaniel Lichfield & Partners	2015	As available
Breakdown of commercial uses in town centres	Class A2: 9% of all units in town centres	Betting shops in town centres: 26% of all A2 uses and 2.4% of all A class units	Banks and building societies in town centres: 37	-	-	-	Southwark Retail Study, Nathaniel Lichfield & Partners	2015	As available

## Environment conditions

### Energy and Climate Change

Objective & indicator for assessment	Southwark		Direction of change	London	National	Source	Most recent data	Frequency of collection
Energy Consumption by Sector	Industry and commerce	507.5	Decrease	-	-	UK Local Authority and Regional Carbon Dioxide Emissions National Statistics 2005 to 2017	2017	Annually
	Domestic Sector	312.5						
Domestic consumption per capita of natural gas	11,530 kwh/year		Decrease	-	16,000 kwh/year	Annual Monitoring Report 2010 - 2011	2010-2011	As available
Domestic consumption per capita of electricity	3,300 kwh/year		Decrease	-	4,800 kwh/year	Annual Monitoring Report 2010 - 2011	2010-2011	As available
Total Carbon emissions in borough(tonnes of CO2)	Industry/commercial	789,000	Decrease	-	-	Annual Monitoring Report 2010 - 2011	2010-2011	As available
	Housing	456,000	Decrease	-	-			
	Transport	258,000	Decrease	-	-			
	Total	1,504,000	Decrease	-	-			
	Per capita	5.3	Decrease	-	-			
Fuel Poverty	7,000 households (6.4% of all households)		Decrease	-	-	-	2013/14	As available

## Air Quality

Objective & indicator for assessment	Southwark		Direction of change	London	National	Source	Most recent data	Frequency of collection
Concentration level of NO2, PM2.5 and PM10 (Annual)	PM10 ( $\mu\text{g}/\text{m}^3$ ) (SWK6)	20	Decrease	-	40 $\mu\text{g}/\text{m}^3$	Air Quality Annual Status Report	2019	Annually
	NO2 ratified and bias adjusted monitoring results ( $\mu\text{g}/\text{m}^3$ ) (SWK6)	32		-	40 $\mu\text{g}/\text{m}^3$			
	PM2.5 ratified and bias adjusted monitoring results ( $\mu\text{g}/\text{m}^3$ ) (SWK6)	No published results		-	25 $\mu\text{g}/\text{m}^3$			
Percentage population exposed to levels of NO2 above the annual average objective limits	45%		Decrease	-	-	Air Quality Annual Status Report	2019	As available

## Transport

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Journey to work by mode	Car/motorcycle – 23% Taxi/other public – 1% Walking – 30%. Cycle – 4% Rail – 8% Underground/DLR – 8%	Decrease (Reduce trips made by car/motorbike to 13% by 2041)	-	-	LB Southwark, Annual Monitoring Report 2017/18: Delivering Southwark's Transport Plan	2017/18	As available
	88% of traffic on our streets is cars and taxis 12% is buses, vans and larger vehicles						
Frequency of Cycling as mode of Transport	4.3%	Increase	-	-	Movement Plan 2019	2009/12	As available
Number of Controlled Parking Zones	As of 2018, there are 25 CPZs in Southwark, covering approximately 800 streets and 48% of the borough	Increase (Introducing a borough wide CPZ by 2041)	-	-	Movement Plan 2019	2019	As available

Number of Casualties	A total of 5,325 casualties were recorded in Southwark between 2012 to 2016 including 417 serious casualties and 26 fatalities.	Decrease	Vision Zero (zero road casualties by 2041)	-	Movement Plan 2019	2012 to 2016	As available
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## Biodiversity

Objective & indicator for assessment	Southwark		Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of SINC Sites	Total	66	Increase	-	-	Open Space Strategy (2013)	2013	As available
	MOL	5						
	BOL Grade I	17						
	BOL Grade 2	22						
	Local Importance	28						
Number of Local Nature Reserves	Southwark has 7 Local Nature Reserves (LNR's) totalling 50.93ha, these are listed below.		Increase	-	-	Biodiversity Action Plan 2019	2019	As available
Number New Protected Sites	17 new protected sites		Increase	Habitat creation targets for London (Table 9)	DEFRA 2018 ' A green future' 25 Year Environmental Plan	Biodiversity Action Plan 2019	2019	As available

## Open Spaces

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of Open spaces (hectares per 1,000 people)	215 open spaces in the borough which together comprise some 605.5 hectares of land, around 21% of the total land area in the borough  1.5 hectares per 1,000 population	Increase	-	-	Open Space Strategy (2013)	2026 – with projected increase in population	-
Park provision (hectares per 1,000 people)	0.7 hectares per 1,000 population	Increase	-	-	-	2026 – with projected increase in population	-
Satisfaction with natural greenspace provision	Satisfaction levels for allotments (92%), large open spaces (86%) and the Thames Path (88%).	Higher	-	-	Open Space Strategy (2013)	-	-
Number of Allotments (Community gardens)	15.3 ha of land across the borough is used for allotments and a further 2.9 ha is used as community gardens	Increase	-	-	Open Space Strategy (2013)	-	-

	797 people on the waiting list for allotment spaces in the borough	Decrease					
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## Soil

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of Open spaces (hectares per 1,000 people)	<p>215 open spaces in the borough which together comprise some 605.5 hectares of land, around 21% of the total land area in the borough</p> <p>1.5 hectares per 1,000 population</p>	Increase	-	-	Open Space Strategy (2013)	2026 – with projected increase in population	As available

## Flood Risk, Water Resources and Quality

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Fre c
Domestic Water Demand across the whole borough (as a proxy measure of water consumption)	111.33 litres per person per day (Old Kent Road)	Decrease (105 litres per person per day)	164 litres per person per day (emerging New London Plan consumption levels)	-	Old Kent Road Integrated Water Management Strategy	2018	As
Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence & water quality grounds	None	Decrease	-	-	Annual Monitoring Report 2010/2011	2010/11	As
Quality of water at consumer's tap (zones) – against National Standards (number of tests failed) Thames Water Aggregated	15	Decrease	15		Drinking Water Inspectorate Annual Monitoring Report	2018	

## Waste management

Objective & indicator for assessment	Southwark					Direction of change	London	National	Source	Most recent data	Frequency of collection
	2010/11	2011/12	2012/13	2013/14	2014/15						
Total household waste collected (tonnes)	2010/11	2011/12	2012/13	2013/14	2014/15	Decrease	Decrease	Decrease	Southwark's Waste Management Strategy 2003-2021	2014/2015	Annual
	110,236	106,121	111,081	116,663	118,814						
Recycling and composting rate (%)	25.14	27.43	30.41	34.30	34.58	Increase	Increase	Increase	Southwark's Waste Management Strategy 2003-2021	2014/2015	Annual
Amount of municipal waste diverted from landfill (recovery rate %)	63.34	79.65	69.49	86.40	95.29	Increase	Increase	Increase	Southwark's Waste Management Strategy 2003-2021	2014/2015	Annual

## Noise management

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
The rate of complaints about noise	18.7	Decrease	14.6	6.3	Wider Determinants of Health – Public Health England	2015/16	Annual
The percentage of the population exposed to road, rail and air transport noise of 65dB(A) or more, during the daytime	14.8%	Decrease	12.1%	5.5%	Wider Determinants of Health – Public Health England	2016	Annual
The percentage of the population exposed to road, rail and air transport noise of 55dB(A) or more during the night-time	18.0%	Decrease	15.9%	8.5%	Wider Determinants of Health – Public Health England	2016	Annual

## Play facilities

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of Open spaces with play facilities	78 open spaces that include some form of dedicated children's play provision	Increase	-	-	Open Space Strategy (2013)	2013	As available
Satisfaction level with children's play spaces	80% of respondents consider the quality of children's play space in the borough to be good or very good	Increase	-	-	Open Space Strategy (2013)	2013	As available

## Quality in Design and Conservation of Historic Environment

Objective & indicator for assessment	Southwark	Direction of change	London	National	Source	Most recent data	Frequency of collection
Number of Historic environment assets	45 conservation areas	Retain	-	-	Annual Monitoring Report 7 (April 2010-March 2011)	2010/11	As Available
	2,200 listed buildings						
	Tower of London World Heritage Site						
	6 Archaeological Priority Zones						

## Appendix 10: Options Testing

This appendix sets out the sustainability appraisal of the three options considered for the Main Modifications to the New Southwark Plan. Each option was appraised against the 17 sustainability objectives, encompassing economic, social and environmental aspects. Each objective is measured on a scoring scale (Key 1), with each grade assigned a numeric value, symbol and colour. Alongside the scoring, a detailed commentary on the objectives is provided.

### Key 1: Individual scoring against each objective

Symbol and colour	Scoring Value (%)	Score	Description
✓✓	100	Major or direct positive	The proposed option/policy contributes significantly to the achievement of the objective.
✓	50	Minor or indirect positive	The proposed option/policy contributes to the achievement of the objective but not significantly or indirectly.
-	0	Neutral	The proposed option/policy does not have any effect on the achievement of the objective or there is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.
x	-50	Minor or indirect negative	The proposed option/policy detracts from the achievement of the objective but not significantly.
xx	-100	Major or direct negative	The proposed option/policy detracts significantly from the achievement of the objective.
?	N/A	Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.

The colour bar below (key 2) divides the overall scoring into three categories from positive, neutral to negative.

### Key 2: Averaged IIA objectives scoring for each policy

Negative	Neutral	Positive
< 10 %	10 - 49%	50 - 100%

The Table1 below sets out the averaged scoring of the 17 objectives to indicate each options overall efficacy in meeting the sustainability objectives.

Table 1: Averaged scoring for the three options considered

	Option A: Business as usual	Timescale			Option B: Place shaping and place making	Timescale			Option C: High option	Timescale		
		S	M	L		S	M	L		S	M	L
IIAO 1	✓	✓	-	?	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 2	?	-	?	?	✓✓	✓	✓	✓✓	✓	✓	✓	?
IIAO 3	?	-	?	?	✓✓	✓	✓	✓✓	✓	✓	✓	?
IIAO 4	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 5	?	?	?	?	✓✓	?	✓	✓✓	✓	?	✓	?
IIAO 6	?	-	-	?	✓	-	-	✓	✓	-	-	✓
IIAO 7	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 8	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 9	-	-	-	-	-	-	-	-	-	-	-	-
IIAO 10	✓	✓	✓	-	✓	✓	✓	-	✓	✓	✓	-
IIAO 11	?	-	?	?	✓	✓	✓	✓	?	?	?	?
IIAO 12	?	-	?	?	✓	✓	✓	✓	?	?	?	?
IIAO 13	?	-	?	?	✓✓	✓	✓✓	✓✓	?	?	?	?
IIAO 14	?	-	-	?	?	-	-	?	?	-	-	?
IIAO 15	?	-	?	?	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
IIAO 16	?	-	-	?	✓	-	✓	✓	?	-	?	?
IIAO 17	?	-	?	?	✓✓	✓	✓	✓✓	?	-	?	?
<b>Avg.</b>	<b>17%</b>	<b>6%</b>	<b>6%</b>	<b>0%</b>	<b>59%</b>	<b>34%</b>	<b>41%</b>	<b>56%</b>	<b>41%</b>	<b>27%</b>	<b>33%</b>	<b>31%</b>

IIA Objectives	Business as usual	Timescale			Commentary on Results
		S	M	L	
IIA 1 To tackle poverty and encourage wealth creation	✓	✓	-	?	Identification of strategic sites without influencing the land uses would be unlikely to achieve an uplift in employment floorspace due to the prevailing higher value of residential development across most of Southwark. The associated benefits would not be realised, however NSP development management policies would limit the loss of employment land and secure local employment in construction in the short term. Without guidance, development within areas and sites relating to enhance key economic clusters would not receive increased support.
IIA 2 To improve the education and skill of the population	?	-	?	?	Without the identification of land for new education facilities on suitable development sites, the delivery of new school places would be more challenging and uncertain. Delays to delivery in order to secure school sites outside of the planning system could impact on educational attainment and skills acquired by pupils. Without guidance, development to support the function of higher education facilities would not receive increased support.
IIA 3 To improve the health of the population	?	-	?	?	Without the identification of land for new primary and community healthcare facilities, the provision of sufficient and integrated health services would be more challenging and uncertain. Delays to delivery in order to secure sites could impact the effective diagnosis and treatment of disease and other health problems. Without identifying the opportunity for extra care facilities on certain sites, a shortfall in places to serve some older people and others with care needs could arise in the future. Various NSP development management policies will manage health impacts of development and secure public health gains. In the absence of area and site guidance however, strategic opportunities to support healthy lifestyles and wellbeing might not be included in development proposals.
IIA 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	The identification of sites alone would have no significant effects. NSP policies would ensure development proposals design out crime as this will generally relate to the detailed design of proposals.
IIA 5 To promote social inclusion, equality, diversity and community cohesion	?	?	?	?	Without guidance on sites and areas, opportunities to improve places for community cohesion and support a diversity of lifestyles could be missed. Delayed or insufficient expansion of school places could adversely affect children and young people. Failing to provide new and integrated health and care services could disproportionately affect older people and people with disabilities or other long-term conditions. In regeneration areas, people living in deprivation may have fewer opportunities to benefit from regeneration where uplifts in employment and new facilities are not provided. Acceleration of development in the short term may prove disruptive to social interaction. Broadly, NSP policies would otherwise manage the impacts of development which might adversely impact specific groups.
IIA 6 To reduce contributions to climate change	?	-	-	?	Without guidance strategic transport projects to reduce greenhouse gas emissions might receive less consideration. NSP proposals would otherwise minimise carbon dioxide emissions from development.
IIA 7 To improve the air quality	-	-	-	-	The identification of sites alone would have no significant effects. NSP policies would require air quality neutral minor development and improvements to air quality from major development.
IIA 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	The identification of sites alone would have no significant effects. NSP policies would require adequate management of waste in accordance with the waste management hierarchy.
IIA 9 To encourage sustainable use of water resources	-	-	-	-	The identification of sites alone would have no significant effects. NSP policies would require reductions in water use and water quality improvement from development.
IIA 10 To maintain and enhance the quality of land and soils	✓	✓	✓	-	The identification of the development potential of certain sites, due to their historic use, may encourage the remediation of contaminated land. NSP policies would secure that remediation.
IIA 11 To protect and enhance quality of landscape and townscape	?	-	?	?	Without guidance the full opportunities of sites to respond to their context and area-wide design considerations might not be realised in proposal. NSP policies would otherwise secure a high standard of design.
IIA 12 To conserve and enhance the historic environment and cultural assets	?	-	?	?	Without guidance the full consideration of heritage assets and opportunities for heritage-led regeneration might not be incorporated into development proposals. NSP policies would otherwise secure the protection of heritage assets.
IIA 13 To protect and enhance open spaces, green corridors and biodiversity	?	-	?	?	Without the identification of opportunities for new open space and green links sufficient space might not be provided to serve the needs of a growing population or habitats provided and connected for wildlife. Policies would otherwise protect existing designated open spaces and secure green infrastructure within development landscaping.
IIA 14 To reduce vulnerability to flooding	?	-	-	?	The identification of sites alone could encourage higher levels of development in areas of flood risk without strategic mitigation of cumulative impacts. NSP policies would otherwise ensure that flood risk due to development is managed.
IIA 15 To provide everyone with the opportunity to live in a decent home	?	-	?	?	Without the identification of land for new homes on suitable development sites, the delivery of new homes would be more challenging and uncertain. A less coordinated approach to infrastructure could result in unexpected costs on some sites putting the delivery of affordable housing at risk if development became unviable.
IIA 16 To promote sustainable transport and minimise the need to travel by car	?	-	-	?	Without guidance strategic transport projects to promote more sustainable modes of transport might receive less consideration. NSP proposals would otherwise minimise car use and prioritise other modes of travel.
IIA 17 To provide the necessary infrastructure to support existing and future development	?	-	?	?	Without the identification of land to provide infrastructure including new education and health facilities and open space and the identification of area-wide improvements the delivery of infrastructure would be less coordinated. This could lead to delays in bringing forward necessary projects and slow down development depending on them. NSP policies would otherwise require development to deliver supporting infrastructure.

	Option B: Place shaping and place making	S	M	L	Commentary on Results
IIA 1 To tackle poverty and encourage wealth creation	✓✓	✓✓	✓✓	✓✓	Requiring an uplift in employment generating land uses on suitable sites would increase employment opportunities and the NSP development management policies include the requirements for training and jobs to be secured for local people, as well as requiring local opportunities in construction. The increase in business space and support for economic clusters within vision areas would more broadly strengthen the local and regional economy along to provide long-term opportunities for poverty reduction and wealth creation.
IIA 2 To improve the education and skill of the population	✓✓	✓	✓	✓✓	By securing land for the expansion of school places on development sites the continued improvement in educational attainment and skills for young people would be supported. The identification of opportunities to expand higher education within vision areas and securing supportive land uses would allow universities to increase the range of educational opportunities on offer within Southwark.
IIA 3 To improve the health of the population	✓✓	✓	✓	✓✓	By securing land for primary and community health care facilities, sufficient accessible services would be available for a growing population. Delivery of health hubs would allow the integration of services to improve their performance. There is a projected need for new extra care facilities in the future and suitable sites have been identified where this model of housing and care would be encouraged. There is an anticipated need for nursing home care, for which sites have not yet been identified that should be kept under review. Site, area and borough wide opportunities are identified to support healthy lifestyles and wellbeing, through increasing the range of local town centre facilities, providing open space and green links and extending the cycle network. Various NSP development management policies will manage health impacts of development and secure public health gains.
IIA 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	The identification of sites would have no significant effects. NSP policies would ensure development proposals design out crime as this will generally relate to the detailed design of proposals.
IIA 5 To promote social inclusion, equality, diversity and community cohesion	✓✓	?	✓	✓✓	Through securing land for local amenities including town centre uses and public open space, providing pleasant walking and cycling routes across areas and enhancing place-specific character opportunities would be created for social interaction and community cohesion as well as a diversity of places for different lifestyles. In regeneration areas there will be more employment opportunities for people living in deprived areas as well as improvements to area living environments, affordable housing offer, education and services. Acceleration of development in the short term may prove disruptive to social interaction. Broadly, NSP policies would also manage the impacts of development which might adversely impact specific groups.
IIA 6 To reduce contributions to climate change	✓	-	-	✓	Visions and allocations would support strategic transport improvements to control and reduce greenhouse emissions, such as improving railway access and expanding the cycle network. There may be opportunities for strategic decentralised energy networks beyond the Old Kent Road area which could be further explored. NSP proposals would otherwise minimise carbon dioxide emissions from development.
IIA 7 To improve the air quality	-	-	-	-	The identification of sites would have no significant effects. NSP policies would require air quality neutral minor development and improvements to air quality from major development.
IIA 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	The identification of sites would have no significant effects. NSP policies would require adequate management of waste in accordance with the waste management hierarchy.
IIA 9 To encourage sustainable use of water resources	-	-	-	-	The identification of sites would have no significant effects. NSP policies would require reductions in water use and water quality improvement from development.
IIA 10 To maintain and enhance the quality of land and soils	✓	✓	✓	-	The identification of the development potential of certain sites, due to their historic use, may encourage the remediation of contaminated land. NSP policies would secure that remediation.
IIA 11 To protect and enhance quality of landscape and townscape	✓	✓	✓	✓	Guidance on vision area character and key landscape or townscape features and site specific design guidance on how development opportunities can complement them are provided. This would ensure that key design considerations are understood at an early stage for development proposals. NSP policies would otherwise secure a high standard of design.
IIA 12 To conserve and enhance the historic environment and cultural assets	✓	✓	✓	✓	Signposting the presence of heritage assets and their contribution to vision area character would ensure that they are considered early in the design process. NSP policies would otherwise secure the protection of heritage assets.
IIA 13 To protect and enhance open spaces, green corridors and biodiversity	✓✓	✓	✓✓	✓✓	By securing new open spaces on development sites and encouraging green links across vision areas the aims of the council's Open Space Strategy will be served to help meet the needs of a growing population. This will also provide opportunities for habitat creation for wildlife, including along strategic habitat corridors and in habitat restoration areas to strengthen the borough-wide green infrastructure network. NSP policies would otherwise protect existing designated open spaces and secure green infrastructure within development landscaping.
IIA 14 To reduce vulnerability to flooding	?	-	-	?	The identification of sites could encourage higher levels of development in areas of flood risk without strategic mitigation of cumulative impacts. With further investigation there may be opportunities to identify and support the delivery strategic sustainable drainage systems. NSP policies would otherwise ensure that flood risk due to development is managed.
IIA 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓✓	✓✓	✓✓	By identifying development capacity for residential development housing delivery would be supported and accelerated. By increasing certainty around infrastructure requirements housing growth should be sustained including affordable housing.
IIA 16 To promote sustainable transport and minimise the need to travel by car	✓	-	✓	✓	Visions and allocations would support strategic transport improvements to promote sustainable transport, such as improving railway access and expanding the cycle network. NSP proposals would otherwise minimise car use and prioritise other modes of travel.
IIA 17 To provide the necessary infrastructure to support existing and future development	✓✓	✓	✓	✓✓	By securing land for infrastructure there would be greater assurance of its timely delivery, preventing delays to development. By giving greater guidance on the aims of area-wide improvements infrastructure may better help shape those places. NSP policies would otherwise require development to deliver supporting infrastructure.

	Option C: High option	S	M	L	Commentary on Results
IIA 1 To tackle poverty and encourage wealth creation	✓✓	✓	✓✓	✓✓	Requiring an uplift in employment generating land uses on suitable sites would increase employment opportunities and the NSP development management policies include the requirements for training and jobs to be secured for local people, as well as requiring local opportunities in construction. The increase in business space and support for economic clusters within vision areas would more broadly strengthen the local and regional economy along to provide long-term opportunities for poverty reduction and wealth creation.
IIA 2 To improve the education and skill of the population	✓	✓	✓	?	By securing land for the expansion of school places on development sites the continued improvement in educational attainment and skills for young people would be supported. The identification of opportunities to expand higher education within vision areas and securing supportive land uses would allow universities to increase the range of educational opportunities on offer within Southwark.  A higher residential capacity option on site allocations would lead to an increase in the number of residents occupying the proposed development. To improve the education and skill of the population, and to sustain the housing growth it needs to be ensured, that the necessary social infrastructure, capacity for this and funding is in place; and the need for infrastructure is identified and planned for.
IIA 3 To improve the health of the population	✓	✓	✓	?	By securing land for primary and community health care facilities, sufficient accessible services would be available for a growing population. Delivery in the form of health hubs would allow the integration of services to improve their performance. There is a projected need for new extra care facilities in the future and suitable sites have been identified where this model of housing and care would be encouraged. There is an anticipated need for nursing home care, for which sites have not yet been identified that should be kept under review. Site, area and borough wide opportunities are identified to support healthy lifestyles and wellbeing, through increasing the range of local town centre facilities, providing open space and green links and extending the cycle network. Various NSP development management policies will manage health impacts of development and secure public health gains.  A higher residential capacity on site allocations, would lead to an increased demand for services and infrastructure, as such it would need to be assessed if the provisions are adequate to support the growth and existing communities. Where it is not this would need to be identified and planned for, ensuring there is sufficient capacity and funding to meet needs.
IIA 4 To reduce the incidence of crime and the fear of crime	-	-	-	-	The identification of sites including those with a higher residential capacity would have no significant effects. NSP policies would ensure development proposals design out crime as this will generally relate to the detailed design of proposals.
IIA 5 To promote social inclusion, equality, diversity and community cohesion	✓	?	✓	?	Through securing land for local amenities including town centre uses and public open space, providing pleasant walking and cycling routes across areas and enhancing place-specific character opportunities would be created for social interaction and community cohesion as well as a diversity of places for different lifestyles. In regeneration areas there will be more employment opportunities for people living in deprived areas as well as improvements to area living environments, affordable housing offer, education and services. Acceleration of development in the short term may prove disruptive to social interaction. A higher residential capacity on site allocations, would lead to an increased demand for services and infrastructure, as such it would need to be assessed if the provisions are adequate to support the growth and existing communities. Where there are not this would need to be identified and planned for, ensuring there is sufficient capacity and funding to meet needs.  Broadly, NSP policies would also manage the impacts of development which might adversely impact specific groups.
IIA 6 To reduce contributions to climate change	✓	-	-	✓	Climate change is attributed to the use of fossil fuel and resultant release of greenhouse gases in the fabrics of our daily living. Any development coming forward with a higher capacity will be expected to minimise the carbon dioxide emissions from the development to help reduce the impact on climate change. The NSP policies will also ensure the development achieves carbon neutral through thoughtful design and offset contributions.
IIA 7 To improve the air quality	-	-	-	-	The identification of sites including those with a higher residential capacity would have no significant effects. NSP policies would require air quality neutral minor development and improvements to air quality from major development.
IIA 8 To avoid waste and maximise, reuse or recycle waste arising as a resource	-	-	-	-	The identification of sites including those with a higher residential capacity would have no significant effects. A higher residential capacity would result in an uplift of residential floorspace and therefore it would create increased waste demands to be managed. NSP policies would require adequate management of waste in accordance with the waste management hierarchy.
IIA 9 To encourage sustainable use of water resources	-	-	-	-	The identification of sites including those with a higher residential capacity would have no significant effects. NSP policies would require reductions in water use and water quality improvement from development. Higher residential capacity would result in an uplift in residential floorspace which could place additional pressures on the water network. Development comes with the potential for water-recycling and sustainable water measures when development is in operation and it would need to be assessed whether this impact of an uplift in higher residential capacity is offset. NSP policies require reductions in water use and water quality improvement from development to manage and offset its impact.
IIA 10 To maintain and enhance the quality of land and soils	✓	✓	✓	-	The identification of the development potential of certain sites, due to their historic use, may encourage the remediation of contaminated land. NSP policies would secure that remediation.
IIA 11 To protect and enhance quality of landscape and townscape	?	?	?	?	Guidance on vision area character and key landscape or townscape features and site specific design guidance on how development opportunities can complement them are provided. This would ensure that key design considerations are understood at an early stage for development proposals. NSP policies would otherwise secure a high standard of design. A higher residential capacity on site allocations would be achieved through an increased development footprint and/or an increased number of storeys.  Higher residential proposals would need to consider the impacts of the development on existing character, heritage and site surroundings to ensure that the quality of the landscape and townscape is protected and enhanced. It is uncertain that as a result of a higher density

					proposal the quality of the landscape and townscape would be protected and enhanced.
IIA 12 To conserve and enhance the historic environment and cultural assets	?	?	?	?	A higher residential capacity on site allocations would be achieved through an increased development footprint and/or an increased number of storeys. Given the higher density proposed it is uncertain if the historic environment and cultural assets would be conserved and enhanced, and if heritage assets would be protected from harm.
IIA 13 To protect and enhance open spaces, green corridors and biodiversity	?	?	?	?	By securing new open spaces on development sites and encouraging green links across vision areas the aims of the council's Open Space Strategy will be served to help meet the needs of a growing population. This will also provide opportunities for habitat creation for wildlife, including along strategic habitat corridors and in habitat restoration areas to strengthen the borough-wide green infrastructure network. NSP policies would otherwise protect existing designated open spaces and secure green infrastructure within development landscaping.  Any development coming forward with a higher capacity other than set out in the Proposed changes to the Submitted New Southwark Plan will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy. A higher capacity option on site allocations can be achieved through an increased numbers of storeys or by a larger development footprint. As a result of the latter it is uncertain if there is adequate space remaining on site to provide the necessary amount of open space and green infrastructure for the growing population to enjoy and to support the wildlife. Although proposals will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy, it would need to be assessed if the contributions would offset the impacts of the development.
IIA 14 To reduce vulnerability to flooding	?	-	-	?	Site allocations with higher development capacity could encourage higher levels of development in areas of flood risk without strategic mitigation of cumulative impacts. With further investigation there may be opportunities to identify and support the delivery of strategic sustainable drainage systems. NSP policies would otherwise ensure that flood risk due to development is managed.
IIA 15 To provide everyone with the opportunity to live in a decent home	✓✓	✓	✓✓	✓✓	By identifying development capacity for residential development housing delivery would be supported and accelerated. Higher residential provision on site allocations would increase the provision of much needed homes, including affordable housing. To sustain the housing growth necessary infrastructure needs to be in place, or the need for infrastructure to be planned and necessary funding is identified for it to be delivered and accommodate the increased demand.
IIA 16 To promote sustainable transport and minimise the need to travel by car	?	-	?	?	A higher capacity option on site allocations, would lead to an increase in the number of residents occupying the proposed development. Although the visions and allocations would support strategic transport improvements to promote sustainable transport, as a result of the higher density it is uncertain if the existing infrastructure is capable of supporting the additional demand in the future. Infrastructure needs to be in place, or the identified need for infrastructure to be planned and necessary funding identified for it to be delivered and to accommodate the increased demand.
IIA 17 To provide the necessary infrastructure to support existing and future development	?	-	?	?	Any development coming forward with a higher capacity other than set out in the New Southwark Plan will be expected to provide the necessary Section 106 contributions and the Community Infrastructure Levy. Given the higher density proposed, it would need to be assessed if the contributions would offset the impacts of the development.

# **New Southwark Plan**

## **INTEGRATED IMPACT ASSESSMENT: SCOPING REPORT**

**February 2015**

<b>CONSULTATION</b>	<b>TIMETABLE</b>
<b>Consultation on Integrated Impact Assessment Scoping Report (this document)</b>	<b>February – March 2015 (five weeks)</b>
Consideration of responses and further evidence gathering and refinement of the IIA framework	<b>April – May 2015</b>
Developing and refining options and assessing effects and preparing the Integrated Impact Assessment Report	<b>June – September 2015</b>
Consultation on the draft New Southwark Plan Preferred Options paper and Integrated Impact Assessment	<b>Autumn 2015</b>
Consideration of responses and developing the draft New Southwark Plan and Integrated Impact Assessment Report	<b>2015/2016</b>
Consultation on the draft New Southwark Plan and Integrated Impact Assessment Report	<b>Autumn 2016</b>
Submission of the draft New Southwark Plan and Integrated Impact Assessment Report to the Planning Inspectorate	<b>2017</b>
Examination in Public	<b>2017</b>
Adoption of the New Southwark Plan	<b>2017</b>

## **HOW TO COMMENT ON THIS REPORT**

If you have any queries regarding this document please contact Southwark council's planning policy team. Comments can be returned by post or email to:

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Consultation on this document begins on 20 February – 27 March 2015

All comments must be received by **5pm on 27 March 2015**

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# 1. INTRODUCTION AND SUMMARY

## 1.1. Summary

- 1.1.1. This scoping report has been produced as part of the Integrated Impact Assessment (IIA) of the New Southwark Plan (NSP). IIA is a method of assessing the possible implications, intended and unintended, of the emerging NSP policies. It will examine how a proposal may affect the communities in Southwark and how these effects may be distributed amongst different groups within the community. The aim of IIA is to make recommendations to enhance potential positive outcomes and minimise negative impacts of a policy. IIA is most effective when used as early as possible in the development of policies.
- 1.1.2. Sustainability Appraisals (SA) are a requirement of the Planning and Compulsory Purchase Act (2004) and Strategic Environmental Assessments (SEA) are required by European Directive EC/2001/42, which was transposed into UK law by the Environmental Assessment Regulations for Plans and Programmes (July 2004). The council has chosen to integrate the Health Impact Assessment (HIA) and Equalities Analysis (EqA) processes with the overarching SA/SEA process to allow for a single joint appraisal to be carried out. Requirements of the Habitats Assessment Regulations (Habitats Regulation Assessment HRA) will be provided separately.
- 1.1.3. The scoping report contains baseline information regarding key environmental, social and economic matters relevant in the borough and likely to be effected by the NSP. It also includes a review of the relevant plans, strategies and legislation, set out in accordance with their spatial significance and grouped accordingly as International, National, Regional and Local. The baseline information and the relevant information contained within the relevant documents will be taken into account in the preparation of the next stage of the NSP, the Preferred Options, and its IIA.
- 1.1.4. The scoping report also establishes a framework for undertaking the IIA, and sets out the sustainability, health and equalities objectives, decision making criteria and indicators that will be used to measure the impacts of the NSP. The IIA will use a check-list approach which will allow stakeholders to quickly identify positive and negative impacts which otherwise might not come to the attention of those involved with preparation of the policy. This process will also be able to highlight any areas of the proposal which may require further exploration, more in depth screening or full impact assessment. IIA recognises that specific impact assessments still have their place, but has been devised to enable a wide range of stakeholders within and across different organisations and communities to consider various potential impacts of the policy at the same time.
- 1.1.5. Under the Environmental Assessment of Plans and Programmes Regulations (2004), three statutory consultation bodies with environmental responsibilities must be consulted on the scope and level of detail of the information included in the report:
1. English Heritage;
  2. Environment Agency;
  3. Natural England.

- 1.1.6. However as this is an IIA with a broader scope than purely environmental issues the council also will consult additional interest groups and bodies with an interest in the issues covered.
- 1.1.7. The results of the consultation on this scoping report will be used to shape the IIA process, including:
- The selection of environmental, social, economic, health and equality aspects to be fully assessed;
  - The identification of IIA objectives;
  - The choice of preferred options to be considered within the New Southwark Plan.
- 1.1.8. This scoping report has been published on the council's website on Friday 20 February 2015 for a five-week consultation period. During the consultation period, we strongly encourage comments to be submitted, where you can suggest improvements or point out if there is anything we have missed. We will respond, and publish responses, to the comments received and make amendments to the information if necessary to inform the IIA of the Preferred Options paper for the draft New Southwark Plan.

## **1.2. Southwark's Local Plan**

- 1.2.1. The "Local Plan" refers to all the relevant documents that are prepared by a local planning authority in planning for the future and in assessing and making decisions on planning applications. There are several layers and sub-sets to a local plan. Numbers 1-7, listed below, together make up Southwark's current Local Plan.
- 1) The National Planning Policy Framework (NPPF) – the NPPF was introduced by the government in 2012 and condensed thousands of pages of national planning policy into 52 pages. To aid understanding and interpretation of the NPPF, the government has also produced topic-based national planning practice guidance (NPPG). However, the guidance does not constitute formal policy, and so does not hold significant weight in the determination of planning applications. The NPPF seeks to establish planning policies applicable to the UK as a whole. Unless otherwise justifiable, all regional and local planning policy must be in general conformity with the NPPF.
  - 2) The London Plan (2011) – The London Plan contains the regional planning policy for Greater London as a whole. The London Plan considers long-term, large scale, strategic issues as well as more detailed policy suited specifically to London, for example prescribing acceptable levels of density in a London context. The Mayor of London also produces more detailed Supplementary Planning Guidance to aid understanding and interpretation of the planning policies in the London Plan. Unless otherwise justifiable, all London borough local planning policy must be in general conformity with the London Plan.
  - 3) The "saved" Southwark Plan policies (adopted in 2007): The saved Southwark Plan policies contain detailed development management policies which are used in assessing planning applications.
  - 4) The Core Strategy (adopted in 2011) is the overarching spatial plan for the borough, and the adopted policies map (2012). This was produced

in response to a new system of local plans introduced by national government. The Core Strategy takes a longer-term, more broad and strategic overview than the 2007 Southwark Plan.

- 5) Area Action Plans (AAPs) - adopted for Aylesbury, Peckham and Nunhead and Canada Water. These documents contain area-specific planning policy fine-tuned for that specific area.
- 6) Other area-based and topic-based Supplementary Planning Documents (SPDs). These do not constitute planning policy and their purpose is to aid understanding and provide a more detailed interpretation of and guidance to local Southwark planning policy.
- 7) Southwark has several neighbourhood forums either established or currently in the process of establishing with the objective of designating a neighbourhood area, for which a group of people can come together and write their own development plan for. Again, this must be in general conformity with the local, regional and national planning policy. So far no neighbourhood plans have been produced or adopted in Southwark.
- 8) Local Development Scheme: This sets out a timetable for the preparation and adoption of the Local Planning Authorities various planning policy documents (such as those listed above). This schedule takes into account the different stages of plan preparation including evidence base gathering or background studies, various consultation phases and, where relevant, any public hearings that the council will need to go through before getting the policies adopted. This is updated every year.

### **New Southwark Plan**

- 1.2.2. The New Southwark Plan (NSP) will replace the saved Southwark Plan and the Core Strategy and it will contain strategic and detailed policies in one whole document. The planning policies, as proposed in the New Southwark Plan, will have significant implications for the social, economic and environmental well-being and resilience of the borough and its residents.
- 1.2.3. The NSP will emerge as a result of a series of consultations which will be carried out over the next few years to meet the requirements of the Town and Country Planning (Local planning) (England) Regulations 2012 (The Regulations) as well as the guidance set out in Southwark's Statement of Community Involvement (SCI).
- 1.2.4. An informal first stage of the preparation of the NSP, the Issues and Options paper, has been out to public consultation since 31 October 2014 and will run until 6 March 2015. These issues and options set out an emerging strategy for regeneration in Southwark and the Council's approach to planning to deliver the Council's Fairer Future promises, updating the strategy and area visions in the Core Strategy (2011).

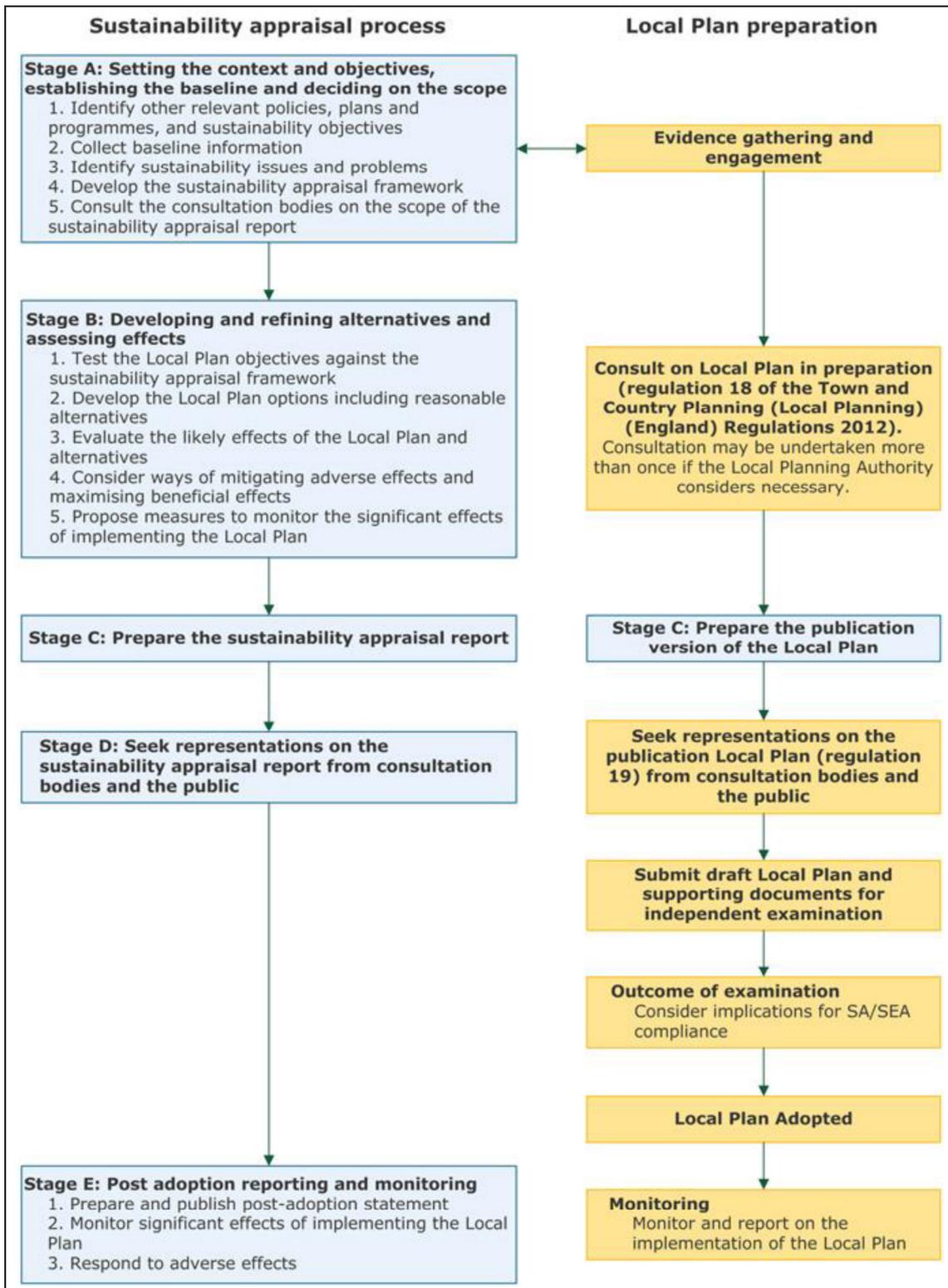
### **1.3. The move towards Integrated Impact Assessment**

- 1.3.1. During the preparation of local plans, the council is required by UK law to assess the sustainability impacts of its planning policies through a Sustainability Appraisal (SA). This is a requirement under section 19 (5) of the Planning and Compulsory Purchase Act ('the Act'). SA is an integral part of good plan making and should not be seen as a separate activity. Its purpose is to promote sustainable development by integrating sustainability considerations into plans. By testing each plan policy against sustainability objectives, the SA process assesses and reports the likely significant effects of the plan policies and the opportunities for improving social, environmental and economic conditions by implementing the plan.
- 1.3.2. SAs are also required to satisfy the European Directive 2001/42/EC. The Directive requires a formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. SEA is transposed into UK legislation through the Environment Assessment of Plans and Programmes Regulations 2004. SEA is focused primarily on environmental effects, whereas SA goes further by examining all the sustainability related effects of plans, whether they are social, environmental or economic. The process for undertaking a SA is conducted in accordance with the requirements of the SEA Directive.
- 1.3.3. The council is also required by UK law to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics, as set out in the Public Sector Equalities Duty (2011) (under section 149 of the Equalities Act 2010). The council carries out Equalities Analysis (EqA) of its plans, decisions and programmes to consider the potential impact (positive and negative) of proposals on the key 'protected characteristics' in the Equality Act 2010 and on Human Rights.
- 1.3.4. Health Impact Assessment (HIA) is a combination of procedures, methods and tools by which a policy, program or project may be judged as to its potential effects on the health of a population, and the distribution of these effects within the population. In this context health can be defined as both physical and mental health and well-being. HIA also considers the potential effects on the determinants of health such as life circumstances and lifestyles. HIA is still a relatively new concept and as yet there is no one standard method for conducting HIAs. However it should involve all relevant stakeholders and use a range of methods to gather data as evidence. While a HIA is not required by law it is considered good practice, particularly since responsibility in managing the health of populations was transferred from national government to local authorities following the Health and Social Care Act 2012.
- 1.3.5. Crucially, assessing policies from these different perspectives - that is 1) a sustainability perspective (including environmental, social and economic sustainability), 2) an equalities perspective and 3) a health perspective - will enable a considered and holistic approach to assessing the proposed policies in the NSP in an integrated way.

- 1.3.6. There are overlaps in the methods and outputs of the above documents and therefore an approach which fuses the statutory requirements of the SA, SEA, EqA and HIA into a single integrated impact assessment will be used to assess the impact of the NSP.

#### **1.4. Process**

- 1.4.1. National Planning Practice Guidance (2014) sets out the key stages and tasks for the SA process and their relationship with the Local Plan process, which are illustrated in Figure 1.1. These key stages and tasks are applicable to the IIA process for the New Southwark Plan. It is important to note that IIA is an iterative and on-going process. Stages and tasks in the IIA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.
- 1.4.2. This document reports the scoping stage of the IIA process for the NSP. Following this introductory Section 1, this report is structured into six further sections:
- Section 2 and Appendix 1 provides a summary of the key plans, strategies and programmes of relevance to the IIA of the NSP;
  - Section 3 describes the characteristics of the borough, setting out a summary of the collated baseline information;
  - Section 4 sets out the key sustainability, health and equality issues and IIA Framework of Objectives;
  - Section 5 sets out proposed approach and method for the IIA; and
  - Section 6 provides the structure of the IIA report and next steps for the process.



**Figure 1**

Source: National Planning Practice Guidance 2014

## **2. IDENTIFYING OTHER RELEVANT PLANS, STRATEGIES AND PROGRAMMES**

### **2.1. Introduction**

- 2.1.1. In order to establish a clear and concise scope for the IIA it is necessary to identify and review the relevant policies, plans and programmes that may influence the content of the AAP. This process enables potential relationships to be identified that will allow potential synergies to be exploited and any inconsistencies and constraints to be addressed. It will also identify additional objectives and indicators, which will assist in analysing and comparing economic, environmental and social impacts throughout the SA and help in identifying key sustainability issues.
- 2.1.2. It is important to identify this policy framework at an early stage as a wide range of guidance and initiatives influence the United Kingdom's planning system and the development of planning policy in Southwark
- 2.1.3. The policy framework is constantly evolving: at a national level, the National Planning Policy Framework and National Planning Practice Guidance are now in place (replacing and simplifying a suite of former national policy and guidance documents); at a regional level, the London Plan and associated Supplementary Planning Guidance are subject to on-going review - for example through REMA (Revised Early Minor Alterations) and the forthcoming FALP (Further Alterations to the London Plan).
- 2.1.4. At a local level, planning decisions in Southwark are influenced by a number of statutory plan-making authorities and policy is developed with regard to corporate Council-wide strategies. In addition the evidence base continues to evolve as the NSP is prepared framework documents are prepared.
- 2.1.5. Appendix 1 provides an overview of the key international, national, regional and local policies, plans and programmes that will inform the NSP and accompanying IIA.

### **3. BASELINE INFORMATION**

#### **3.1. Introduction**

- 3.1.1. The SEA Directive requires the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the borough and providing the basis for predicting and monitoring effects of the NSP. To make judgements about how the emerging content of the NSP will progress or hinder sustainable development, it is essential to understand the economic, environmental and social circumstances in the borough today and their likely evolution in the future. The aim is to collect only relevant and sufficient data on the present and future state of the borough to allow the potential effects of the NSP to be adequately predicted.
- 3.1.2. The SA/ SEA Guidance provided by Government proposes a practical approach to data collection, recognising that information may not yet be available and that information gaps for future improvements should be reported as well as the need to consider uncertainties in data. Collection of baseline information should be continuous as the IIA process guides plan making and as new information becomes available.
- 3.1.3. A summary of the collated baseline information is provided below.

#### **3.2. SOCIAL CONDITIONS**

##### **Population**

- 3.2.1. Before January 2015, the largest London's population has ever been was in 1939. Then it was around 8.6 million people. However, on the 6<sup>th</sup> of January 2015, for the first time, London's population grew beyond its previous record, now estimated to be above the 1939 8.6m figure.<sup>1</sup> London is growing at a significant pace, and Southwark is part of this growth.
- 3.2.2. At the time of the 2011 census, Southwark's total population was 288,283.<sup>2</sup> The total population at the time of the 2001 census was 244,866.<sup>3</sup> This is an increase of 43,417 (18% increase).
- 3.2.3. The GLA projected Southwark's population in 2014 to be around 304,100.<sup>4</sup> In 2018, when the NSP will be adopted, the GLA projects this to be 326,400 and in 2033, the period up to which the New Southwark Plan will cover, the population of Southwark is estimated to be 370,400.<sup>5</sup> This represents a 28% increase on the 2011 population figure, and a 21% increase on the 2014 estimate.

##### **Age groups of Southwark**

- 3.2.4. The proportion of residents in each age group is as follows:

## Proportion of population by broad age band

mid-2012

	0–15 years	16–64 years	65+ years
	%	%	%
<b>Southwark</b>	18.6	73.6	7.8
<b>London</b>	20.1	68.7	11.3
<b>England</b>	18.9	64.1	16.9

Source: Office for National Statistics <sup>6</sup>

- 3.2.5. In Southwark, the proportion of the population aged between 16-64 years is 73.6% making it the largest age group in Southwark at 212,176 people. This is 4.9% higher than the London region as a whole, and 8.8% higher than the UK as a whole. Southwark has a smaller proportion of people in the 0-15 (at 53,620 people) and 65+ (at 22,486 people) age groups than the London region and the UK as a whole. Between mid-2003 to mid-2012, the proportion of people in the 65+ age group decreased by 9.6%. This is the only age group to see a decrease. The 0-15 age group saw a 7.7% increase and 16-64 age group saw a 20.6% increase. The average age of a Southwark resident is 33.8 years.
- 3.2.6. In the coming years, it is anticipated that the proportion of the population aged 65+ will increase. In 2012, 27.6% of people in Southwark were aged 45 or more. By 2031 this is projected to increase to 31.2%. For the 65+ age bracket the projected increase is from 7.8% to 10.1%.<sup>7</sup>

### Diversity

- 3.2.7. 54.2% of Southwark's population can be categorised in the broad ethnic group of "white." This is largely on par with the London region, however this is significantly lower (31.2% lower) than England as a whole. 45.8% of Southwark's population are part of an ethnic minority (sometimes referred to as BME or BaME – Black and Ethnic Minority Background). The largest broad ethnic group is Black/African/Caribbean/Black British at 26.9%. This is more than double the London region (13.3%) and is between 7 and 8 times higher than England, at 3.5%. The next largest ethnic group in Southwark is Asian/Asian British, at 9.4% of the total population of Southwark. This is almost half the London region, and only 1.6% higher than England. "Mixed/multiple ethnic groups" and "other ethnic groups" are roughly in line with London-wide figures, (at only 1.2% and 0.1% more than London as whole, respectively). However, these figures are between 2 and 3 times higher for London and Southwark compared with England.

Percentage of population by broad ethnic group

2011

	White %	Mixed/ multiple ethnic groups %	Asian/ Asian British %	Black/ African/ Caribbean/ Black British %	Other ethnic group %
<b>Southwark</b>	54.2	6.2	9.4	26.9	3.3
<b>London</b>	59.8	5.0	18.5	13.3	3.4
<b>England</b>	85.4	2.3	7.8	3.5	1.0

Source: 2011 Census, Office for National Statistics <sup>8</sup>

3.2.8. 36.5% of Southwark's residents were born outside the UK. This is 2.9% lower than inner London as a whole, and 0.7% higher than London as a whole. The largest migrant population in Southwark is Nigerian, representing 4.7% of the population. The second largest is immigrant population is Jamaican, at 2.0%. Third are Irish, at 1.7%.

3.2.9. The main language for 19.6% of people age 3 years and over is something other than English. This is below the inner London rate of 25.2% and the London-wide figure of 22.1%<sup>9</sup>. This translates into 10.9% of households not having a member whose main language is English.<sup>10</sup>

### Density

3.2.10. Southwark has an average of 10,173 people per sq. km<sup>11</sup>. This is roughly in line with the inner London average of just below 10,410 people per sq. km. This is a slight increase (of 1.8%) on the 2001 figure of 9,990 people per sq. km. Southwark's population density is almost double that of the London average. Southwark and inner London's population density is roughly 25 times that of England as a whole.<sup>12</sup>

3.2.11. The boundaries of Southwark cover 2,886 hectares. The number of people per hectare is 105.5 (the inner London figure being 106.4). London as a whole is 54.3 people per hectare.<sup>13</sup>

### Faith

3.2.12. The majority of residents in Southwark who stated their religion in the 2011 Census were of Christian faith (52.5%) with the second highest category being 'No religion' (26.7%). By comparison 48% were of Christian faith in London and 59% nationally, with 21% of London residents expressing no religion and 24.7% nationally.<sup>14</sup>

## Deprivation

3.2.13. The Indices of Multiple Deprivation (IMD) 2010 combines a number of indicators, chosen to cover a range of economic, social and housing issues, into a single deprivation score for each small area of roughly 1,500 residents (called Lower Super Output Areas - LSOAs) in England. This allows each area to be ranked relative to one another according to their level of deprivation. Released in January 2010 by the Department of Communities and Local Government, the 2010 IMD is currently the most recent version available.

3.2.14. Overall, Southwark ranked as 41<sup>st</sup> most deprived borough out of the 326 local authorities in England. This is a relative improvement from previous rankings when Southwark was ranked 26<sup>th</sup> in 2007. Southwark moved from 6<sup>th</sup> most deprived borough in London in 2004, to 9<sup>th</sup> in 2007, to 10<sup>th</sup> in 2010. 16 LSOAs (10%) in 2007 in Southwark fell within the 10% most deprived in England compared with 4 LSOAs (2%) in 2010. These are in East Walworth, South Bermondsey, Nunhead and the northern part of Livesey. The number of 20% most deprived LSOAs in Southwark fell from 79 (48%) in 2007 to 54 LSOAs (33%) in 2010. In terms of smaller pockets (LSOAs) our most deprived is only 148<sup>th</sup> lowest ranked in London and 1,853<sup>rd</sup> nationally. Amongst the 10% most deprived nationally, 12 LSOAs in Southwark improved their deprivation ranking, whilst only one worsened between 2007 and 2010. Figure 2 represents the IMD for Southwark.

### IMD Indicators

3.2.15. The 2010 IMD is grouped into broad indicators, or domains, each of which is compiled from a number of sub-domains, some of which are described below, along with a summary of Southwark's ranking.

- ***Income deprivation (including numbers of adults and children on a range of benefits):***

Southwark is ranked as 25<sup>th</sup> most deprived borough in England compared to 18<sup>th</sup> in 2007.

- ***Employment deprivation (including numbers on a range of out of work benefits):***

Southwark is ranked 33<sup>rd</sup> in England compared with 22<sup>nd</sup> in 2007. In London it was ranked 4<sup>th</sup> most deprived borough compared with 2<sup>nd</sup> in London in 2007.

- ***Health and disability (including figures on standardised measures of morbidity, disability and premature death):***

Although the percentage of Super Output Areas (SOA) in the 10% most deprived increased from 2.42% in 2007 to 4.24% in 2010, the percentage of SOAs in the 20-30% most deprived fell by 20.61% (from 56.36% in 2007 to 35.76% in 2010). Four of Southwark's SOAs were in the 80-100% least deprived in 2007, which increased to 10 SOAs in 2010.

- ***Education, skills and training (including a range of school attainment figures for children and young people and those for adults with few/no qualifications):***

There was a general improvement in Southwark's education, skills and training ranking between 2007 and 2010, with all LSOAs in Brunswick Park and Rotherhithe wards improving between the two IMD periods. Livesey, Newington and Peckham wards also had more than three quarters of its LSOAs improving their ranking over this period.

Whilst College ward had improvements in more than half of its LSOAs, it also saw an increase in relative deprivation in three of its LSOAs. One LSOA in Camberwell Green ward became three deciles more deprived in this domain.

Over one third of LSOAs in South Bermondsey ward were in the bottom 30% nationally, followed by Grange ward which had one quarter of LSOAs falling into the bottom 30% nationally. Nearly all LSOAs in Village ward and over half the LSOAs in both Peckham Rye and Surrey Docks were in the 80-100% deciles.

- ***Barriers to housing and other services (including the accessibility of housing and proximity of key local services):***

Housing is a poorly performing category for Southwark with only six LSOAs not falling into the 20% most deprived nationally. Southwark now ranks 25<sup>th</sup> most deprived borough, moving from 19<sup>th</sup> in 2007. Most LSOAs remain in the most deprived 20% in England, although 32 LSOAs moved from the most deprived 20% to the second most deprived.

- ***Crime levels (including figures for recorded crime in four key areas: violence, burglary, theft and criminal damage):***

In 2007, 29 (17.6%) of Southwark's 165 LSOAs were in the 5% most deprived nationally, ranking Southwark at 15<sup>th</sup> on the crime ranking. This compares with only 14 (8.5%) of Southwark's LSOAs being in the 5% most deprived in 2010. Southwark's ranking has improved from 15<sup>th</sup> in 2007 to 50<sup>th</sup> in 2010. Within London, it is now the eighth highest ranked.

Overall, 92 of Southwark's LSOAs (55.8%) improved their crime rankings. These improvements were most notably in Camberwell, Dulwich and Rotherhithe. The areas with worse rankings than in 2007 are to the north of the borough, in Bermondsey and Walworth.

- ***Living Environment (includes separate scores for the quality of indoor living environment and outside living environment):***

Overall, Southwark is the 9<sup>th</sup> worst ranked borough in terms of living environment. Southwark's indoor living environment (housing quality) score is generally in the 10-50% most deprived. However, the majority of the borough's outdoor environment is in the 5% most deprived in England.

### **Indices of Deprivation Affecting Older People Index (IDAOP) 2010**

3.2.16. About a quarter (45) of Southwark's 165 LSOAs fall within the 10% most deprived nationally. When considering the 30% most deprived nationally, 129 or four fifths of Southwark's LSOAs fall within this category. There is significant deprivation in all wards other than the most southerly wards College, Village, East Dulwich and Peckham Rye.

## Indices of Deprivation Affecting Children Index (IDACI) 2010 Analysis

3.2.17. The IDACI is a subset of the Income Deprivation Domain and shows the proportion of children in each LSOA that live in families that are income deprived (i.e. in receipt of Income Support, income-based Jobseeker's Allowance, Pension Credit (Guarantee) or Child Tax Credit below a given threshold).

- Between 2007 and 2010, Southwark's proportion of children under 16 years living in deprivation decreased from 43% to 37%. Despite this improvement, two thirds of LSOAs were in the bottom 20% decile in London, and almost one quarter of all LSOAs were in the bottom 10% nationally.
- Eight Southwark wards had all LSOAs falling into the bottom 30% nationally, with only East Dulwich and Village wards having no LSOAs in the bottom 30%. The pockets of greatest deprivation were in the middle/north-east of the borough. Livesey ward had the largest proportion of most deprived LSOAs (88%), with Rotherhithe and South Bermondsey wards both having half of LSOAs in the bottom 30% in Southwark.
- Bermondsey and Rotherhithe Community Council had the highest number of the 10% deprived deciles but Peckham and Nunhead Community Council had the overall highest proportion of LSOAs in the bottom 30% for Southwark.
- Around 40% of LSOAs decreased in their deprivation between 2007 and 2010, with eight LSOAs improving by 2 deciles.
- East Dulwich and Riverside wards improved the most between the two time periods, with five LSOAs in each improving by at least one decile. The Lane ward had two LSOAs which improved by two deciles and two LSOAs in The Lane ward improved by two deciles.
- Dulwich Community Council had the largest overall improvement, with nearly three quarters of LSOAs becoming less deprived by at least one decile. Despite these improvements however, Dulwich Community Council also had the highest proportion of LSOAs which became more deprived (10%, 2 LSOAs).

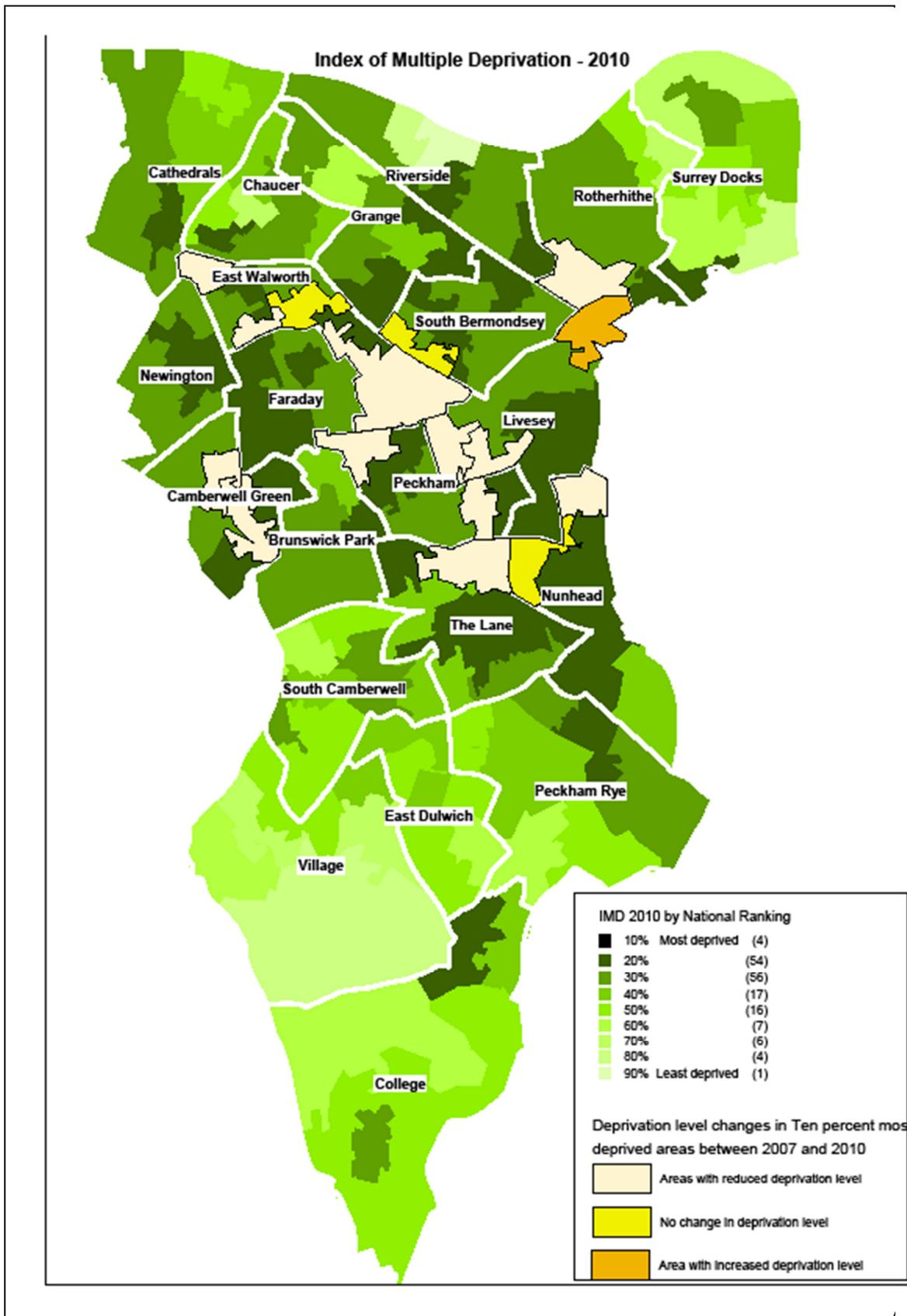


Figure 2

## **Housing**

### **House Prices**

3.2.18. London and Southwark's growing population has serious implications for housing. The increased demand for housing means effects on affordability and overcrowding. In 2013 the average house price in Southwark was £347,500<sup>16</sup>. This compares favourably with the inner London average of £400,000, however Southwark's average house price is more expensive than the London average of £321,000. Across England as a whole, the average house price was £187,000. This makes the cost of buying a house in Southwark around 1.85 times more expensive than in the rest of the UK.

### **Southwark's housing stock and tenure**

3.2.19. Southwark Council is one of the largest landlords in the UK, being responsible for 39,780 dwellings within its boundaries. This equates to 32% of the total number of homes in the borough. This is a significantly higher proportion than Greater London as a whole, where 12.2% of the total housing stock is owned and managed by local authorities.<sup>17</sup>

3.2.20. In 2011, 30.6% of the 39,780 council homes in Southwark fell below the government's "decent homes standard." This equates to 12,173 dwellings. Again this is significantly higher than the London-wide figure of 22.4% of council homes falling below the "decent homes standard."<sup>18</sup>

3.2.21. Housing provided by registered social landlords (RSLs), such as Housing Associations, make up 12.5% of the borough's housing stock, at 15,530 dwellings. This is roughly in line with the London-wide figure of 11.4% of the city's housing stock<sup>19</sup>.

3.2.22. The largest proportion of housing in Southwark is taken up by private dwellings, including owner-occupied and private rented housing, with 69,010 homes making up 55.5% of the total number of homes in the borough. This is significantly less than the London-wide figure of 76%, and England as a whole where 82.2% of housing is privately owned.<sup>20</sup>

3.2.23. 32% of private dwellings are owner-occupied, while 23.5% are rented to private tenants. This compares with a much higher 51% owner occupied and similar 24% private rented for London as a whole.<sup>21</sup>

3.2.24. Flats are the dominant housing typology in Southwark, comprising over 75% of the borough's stock, with one and two-bed units make up two thirds of the stock. More than 30% of dwellings were built after 1972.<sup>22</sup>

### **New build homes (Use Class C3) in Southwark**

- 3.2.25. Since 2011, the Mayor of London has expected Southwark to meet a target of 2005 net new homes every year up to 2021 to make a total of 20,050<sup>23</sup>. This includes new-build, conventional, self contained homes as well as non-conventional, non-self contained homes such as hostels, HMOs, care homes and student housing. For some boroughs, the Mayor expects empty homes bought back into use to count towards meeting their target. In prescribing his targets, the Mayor did not expect Southwark to deliver any new homes from bringing empty units back into use. However Southwark has consistently delivered new homes this way each year regardless. During each year since 2004/05, Southwark has bought an average of 157 empty homes back into use<sup>24</sup>.
- 3.2.26. To meet the housing target an average of 1875 (or 94%) of the 2005 are expected to be conventional, self contained homes. The remaining 130 homes (or 6%), according to the Mayor of London, are expected to be non-conventional, non-self contained homes, such as student housing<sup>25</sup>.
- 3.2.27. In the past three years, Southwark has only met its target of 2005 once, in 2012/13, with 2008 new homes completed in the borough. However, this was not split by the expected 94% conventional/ 6% non-conventional. Not only were there 138 empty homes bought back (which are not included in the Mayor's target for Southwark) but only 1,069 self contained homes were completed, alongside 801 non-conventional homes<sup>26</sup>. This represents a proportional split of 7% for empty homes bought back into use, 53% for conventional homes completed and 40% of non-conventional (student housing). It is acknowledged that 2012/13 was an unusually high year for the completion of non-conventional (student) homes. Since 2011/12 the average amount of student housing delivered each year has been over half the 2012/13 amount, at 356 student rooms a year.
- 3.2.28. Last year Southwark saw 1,651 new conventional homes completed in the borough, which was the highest of all the London boroughs. 156 empty homes were bought back into use, and 7 non-conventional homes were completed. This gave an overall number of 1814<sup>27</sup>.
- 3.2.29. However, looking at the past three financial years as a whole, (2011/12, 2012/13 and 2013/14) Southwark has delivered the highest number of total conventional homes, the highest number of affordable homes (including shared-ownership, affordable rent and social rent) and the highest number of social rented homes out of all the London boroughs<sup>28</sup>.
- 3.2.30. The draft Further Alterations to the London Plan (FALP) has prescribed Southwark with an increased target of 2,736 new homes per year<sup>29</sup>.

### **Affordable housing and family-sized housing**

- 3.2.31. Southwark's housing needs were most recently assessed in the South East London Strategic Housing Market Assessment (SHMA) 2014, which looked at the South East London sub-region as a whole. The SHMA 2014 recognised that the largest demand for housing in Southwark is for family and affordable housing, particularly social rented housing. In 2013, average house price in Southwark was 12.8 times the average full-time worker's earnings. This is higher than the London average of 11.8 times earnings.

- 3.2.32. Southwark has over 18,400 overcrowded households, representing over 15% of the borough's households. Almost 3% of these households fell into the "severely over crowded" capacity, being two or more bedrooms short of need. In 2013 there were 761 households classed as homeless and in temporary accommodation. The SHMA estimates an additional 2,232 households will have affordable housing need in the future. This is from newly formed households unable to buy on the open market as well as existing household falling into need due to changing circumstances. Southwark also has a backlog of over 19,000 households with an unmet need for affordable housing, with over 16,000 of these being overcrowded households. Overcrowding is known to have a negative effect, particularly with children, on physical health and mental well-being.<sup>30</sup>
- 3.2.33. The SHMA surmises that to meet the existing and future affordable housing need Southwark need to deliver around 800 affordable units per year. 67% of this figure would meet needs through being intermediate housing. According to the SHMA, the largest demand is for three and four bed units in the social and affordable rented sector. There is no additional requirement for one-bed units in the social and affordable rented sector. In the intermediate sector the greatest demand is for two-bedroom units.
- 3.2.34. Since 2011/12, the yearly average number of affordable homes completed in Southwark was 496. This is 62% of the estimated need as identified in the SHMA. 496 new build affordable conventional homes equates to 39% of all new conventional homes built each year. Of this 39%, 26% have been for social rent. Since 2011/12, 35% of all new build affordable units in Southwark were family sized (three-bedrooms or more), at 515 family-sized affordable units of 1488 affordable units. 897 family sized units (market and affordable) have been delivered as part of the total 3808 units delivered since 2011/12, representing 24%.<sup>31</sup>

### **Housing to meet specific-needs**

- 3.2.35. Southwark is projected to have a 63% increase in the number of people aged 65+ between 2012 and 2032. There is also a 73% projected increase in the number of people aged 85+. Southwark has a below average supply of specialised elderly accommodation (compared with the average for South East London). 33% of elderly households in the borough are owner-occupied while 61% are in the social rented sector. Southwark has fewer elderly people with mobility issues than other South East London boroughs (with around 4,200) however this group is expected to increase by 17% between 2012 and 2020.<sup>32</sup>
- 3.2.36. Over the same period, the number of working age people with serious physical disability is expected to increase by 23% from 3,600 to almost 4,450. Current unmet need for wheelchair housing stands at close to 550 households.<sup>33</sup>
- 3.2.37. Of the 4,300 students living in halls of residence in South East London, more than half were in Southwark.<sup>34</sup> Over the past 10 years, close to 1,800 student rooms have been delivered in Southwark each year, with over 1000 of these completed since 2011/12.<sup>35</sup>

3.2.38. Together with Lewisham, Southwark has the most ethnically diverse population in the South East London sub-region. The borough has a significant number of African households. Compared to the population as a whole, a very high proportion of Black households (70%) are housed in the social/affordable rented sector and a small proportion of this group (17%) is in owner-occupation. A greater proportion of White households in Southwark are in the 64+ age group compared to the other ethnic groups in the borough.<sup>36</sup>

## **Social Infrastructure**

### **Education, Skills and Training**

3.2.39. There are significant disparities in educational attainment and skills in Southwark. In 2012, 9.4% of people aged between 16 and 64 had no qualifications. This was a higher percentage than in London as a whole. However, the trend was downwards and Southwark's percentage had dropped 1.4% since 2009 (data source: Office for National Statistics/Nomis).

3.2.40. During the school year Sep 2011–Aug 2012 in Southwark, 60% of pupils at the end of KS4 were achieving 5+ A\*-C grades including English and Mathematics. This proportion was less than in London as a whole (62.5%). The proportion of boys achieving these standards (55%) was significantly lower than girls (65%) (data source: Department for Education).

3.2.41. However, it was also the case that in 2012 a higher percentage of people aged 16 to 64 in Southwark had achieved a Level 3 NVQ qualification (66.4%) than in London as a whole (63.2%). The disparity was greater at NVQ Level 4 with 55.5% of Southwark's population aged 16 to 64 attaining that standard, compared to only 47.6% in London and 34.2% in England (data source: Department for Business, Innovation and Skills).

3.2.42. In 2012, the proportion of 16 to 18 year-olds NEET (not in education, employment or training) in Southwark was 7.7% compared to 4.7% in London (data source: Department for Education).

3.2.43. The New Southwark Plan will need to support Southwark's aims of improving educational attainment, skills and aspirations of residents

### **School Redevelopment and Expansion**

3.2.44. A school places strategy update to Southwark's cabinet in July 2014 reported that an additional 1,080 extra primary school reception places were created between 2009 and 2013 and that further places will be in place by September 2015 and 2016. Demand for primary places, particularly in the north of the borough, continues to rise. Further work is being undertaken by the council to ensure that additional places are available as demand rises.

3.2.45. The same cabinet report noted that whilst there is currently an overall surplus of secondary school places, a further 11 forms of entry (FE) for Year 7 pupils is forecast to be required across the borough by September 2018 with this rising to a further 19 FE by September 2019. Work is already underway across our existing secondary schools to assist and facilitate expansion so that many of our oversubscribed schools will be able to accommodate more students in the years ahead. In addition, the council is committed to opening a new secondary school in East Dulwich. Furthermore, the need for another new secondary school from September 2019 will be actively kept under review to enable delivery in an appropriate timescale.

### **Health Baseline**

3.2.46. Southwark's Joint Health and Wellbeing Strategy 2013-14 reported that in general, health and wellbeing outcomes are improving for Southwark's residents, although significant inequalities remain. There are significant contrasts of poverty and wealth, with deprivation concentrated in the areas between the more affluent strip close to the river and Dulwich in the south. The majority of wards in Southwark, for example, appear in the bottom quarter in England for wellbeing scores, with only three ranking better than the national average for wellbeing.

3.2.47. Major health indicators such as mortality and life expectancy have improved (life expectancy at birth for males is 77.8 years compared to 78.6 years in London and 82.9 years for females compared to 83.1 years in London, January 2007-December 2009, ONS), although significant inequalities are evident across the population. The difference in life expectancy, for example, between the worst off and best off is 9.5 years for men and 6.9 years for women.

3.2.48. The number of deaths every year is falling, with the borough's rate now broadly in line with London's average. Despite overall numbers falling, deaths from lung cancer are rising, and the incidence and mortality for cervical cancer, although improving, remains worse than the national average. Major risk factors in early deaths include smoking, obesity, sedentary lifestyles and poor management of long term conditions such as hypertension or diabetes, all of which are impacted by ethnic and socio-economic factors.

3.2.49. Nearly half of local adults, however, say they do no sport or active recreational pursuits, and these increasingly sedentary lifestyles are contributing to growing numbers of people with diabetes – there are estimated to be around 19,500 people with diabetes locally. In addition, the rates of obesity in childhood remain among the worst in London (the prevalence of obese children in year 6 in Southwark is 26.5% compared to 21.9% in London and 19% in England, September 2010-August 2011, ONS).

3.2.50. Poor mental health also has a significant impact on physical health. There is a greater concentration of mental health need in the centre of the borough than in the north or the south, corresponding both to higher levels of deprivation, and lower levels of employment (overall the ONS reports 8,751 accessing NHS specialist mental health services in the year April 2010-March 2011).

3.2.51. Southwark's children and young people are in the main in good health. There are, however, high levels of child poverty, Southwark scores poorly on the index of wellbeing for children, and infant and child mortality are worse than the national average (infant mortality rates in Southwark are 5.3 per 1,000 live births compared to 4.4 per 1,000 in London and England, January 2008 to December 2010, ONS). In addition, although rates for key immunisations, such as diphtheria, tetanus, MMR and whooping cough, have improved in Southwark, they are still lower than for the rest of the country.

3.2.52. Southwark has fewer numbers of older people than the rest of London, although this is predicted to rise – with an extra 900 people aged 85 or over expected by 2020, which is an increase of nearly 30% on current levels. The number of people with disabilities and learning difficulties is also rising steadily, with those under 65 years predicted to increase to around 20,000 by 2025.

3.2.53. An ageing population brings health challenges, with the estimated 12,500 over-65s in Southwark living with a long term illness rising to over 17,000 by 2025. The borough has a higher prevalence of long term conditions for older people than national or London figures, which may reflect ethnic diversity and higher levels of deprivation. In addition, there are estimated to be around 1,800 people living with dementia, a figure that is predicted to rise by around 300 by 2020.

#### **Health floor space delivered**

3.2.54. Between 2004-14, there was a net gain of over 1,900 sqm of health (D1) floor space delivered in Southwark. Significant gains included Southwark's child development centre, Sunshine House, SE5, which delivered over 3,300 sqm of health-D1 floor space on completion in 2007-08. More recently, a new health facility of 1,500 sqm opened in August 2014 on the Downtown site, Rotherhithe.

#### **Community Uses**

3.2.55. Growth in homes and jobs also generates a need for other community facilities including nursery and childcare space, premises for faith groups, libraries, museums and cultural spaces etc.

3.2.56. In the last 10 years a number of these types of facilities have been approved or are under construction, including:

- Over 3,800sqm of nursery and child care space, including the 1,000sqm South Bermondsey Children's centre, on Tendra Road, SE1.
- Nearly 2,000sqm of floorspace for faith groups, including a facility of 2050sqm in Ruby Street completed in 2005/06, a facility of 1,114sqm on Congreve Street completed in 2010-11 and 846sqm of space on Spa Road, SE1 also completed in 2010-2011.
- A net total of over 6,800sqm of space which has been used for a variety of purposes including the new Canada Water Library, which also provides a café and performance space and the White Cube Gallery in an old warehouse on Bermondsey Street. There are also several projects in the pipeline including a new library in Camberwell due to open in 2015 and the renovation of the Walworth Town Hall, following the fire in 2013. The vision for the town hall building includes

provision of an enhanced Newington Library space, a space for the display of the Cuming collection and Southwark museum, a flexible space that could be used for a variety of purposes including community and civic events, exhibitions and performances and facilities for marriage, civil partnership and citizenship ceremonies undertaken by the Southwark registrar's service.

### **3.3. ECONOMIC CONDITIONS**

#### **Jobs and Businesses**

- 3.3.1. In 2013, Southwark held over 197,000 “employee jobs” within its boundaries. This is an increase of 14% from the 2009 figure of 172,900. These figures however exclude self-employed people, government supported trainees and HM Forces. The total amount of jobs in Southwark came to 270,000 in 2012. This is up by 9% on the previous year in 2011, with 247,000 jobs in the borough.<sup>37</sup>
- 3.3.2. Over 99% of the businesses in Southwark are micro and small-to-medium sized enterprises. This equated to a total of 12,575 micro-SMEs in 2014, having grown by 8% since 2011 from 11,670 businesses. The largest increase was in small-sized businesses (employing 10-49 people), which grew by 20% from 1,150 to 1,380. Medium sized-businesses (employing 50-249 people) grew by 15%, from 270 to 310, while micro-businesses (1 to 9 people) grew by 6% from 10,250 in 2011 to 10,885. Large businesses (employing 250 people or more) account for 0.7% of the borough’s total, at 85. The total number of businesses in Southwark is 12,660.<sup>38</sup>

#### **Economic Activity/Inactivity**

- 3.3.3. Nearly two thirds (74%) of people in Southwark are aged 16-64 i.e. the age where they can be economically active. Of this percentage, 78% of 16-64 year olds are economically active. Of this 78%, 8% are unemployed, which is 1% higher than the London average. 71% of Southwark’s working age population are employed, and of this 11% were self employed.<sup>39</sup>
- 3.3.4. The comparison of employment statistics between genders reveals that the proportion of females in employment is consistently less than males, either as employees or self employed. For example, 75% of economically active males in Southwark are in employment, compared with 66% of females. The difference between genders in the proportion of people that are employees (as opposed to self-employed) isn’t so stark, with 60% of males, compared to 58% of females. However, 14% of economically active males are self employed, which is double the proportion of economically active females that are self employed, at 7%.<sup>40</sup>
- 3.3.5. This is in contrast to the London-wide figures, where there is a higher proportion of economically active males employed than in Southwark, while there is a lower proportion of economically active females employed in London than in Southwark. The proportion of economically active females that are unemployed is less than males, at 9% vs. 10%.<sup>41</sup>
- 3.3.6. The largest sector of employment in Southwark is “professional occupations.” This amounts to 30% of all jobs in the borough. This is 6% higher than London as a whole and 10% higher than Great Britain as a whole. This is followed by “associate technical and professional”, at 21%.The third largest is “managers, directors and senior official,” making up 11% of employment in the borough.<sup>42</sup>

- 3.3.7. The proportion of people with NVQ level qualifications has consistently increased in Southwark in recent years. 56% of people aged 16-64 have an NVQ level qualification at level 4 or above. 69% of people have achieved level 3 or above, 80% at level 2 and above, and 86% at level 1 and above. Since 2004, each of these levels has increased by between 18-19%. The proportion of people aged 16-64 with no qualifications dropped by almost half from 15% to 8% between 2004 and 2013.<sup>43</sup>
- 3.3.8. Several other occupation groups, namely “elementary occupations”, “caring leisure and other service occupations” and “administrative and secretarial” are all around 8-9%, making up the next largest sectors of employment in Southwark.<sup>44</sup>
- 3.3.9. In 2012 almost 79% of people in employment in Southwark were employed in the private sector, leaving 21% working in the public sector.<sup>45</sup> This is higher than the London-wide rate of 17% and the England-wide rate of 19%.
- 3.3.10. Of the 8% of unemployed people 3% were claiming job seekers allowance (JSA), compared with 2% for London and UK as a whole. This compares favourably with 6% in 2011. A third of the 3% claiming JSA had been doing so for more than one year.<sup>46</sup>
- 3.3.11. 22% of people aged 16-64 are economically inactive, accounting for 46,700 people. This compares closely with the London rate of also around 22%. The largest sections of the borough’s population that are economically inactive are 16,700 students, making up 36%. 24% are homebound with domestic and family duties (at 11,300 people) while over 19% are long term sick (9,100 people).<sup>47</sup>
- 3.3.12. In total, 13% of 16-64 year olds are claiming key out-of-work benefits, amounting to 28,810 people. As well as JSA, this includes disabled, lone parents, carers and the bereaved. Employment and Support Allowance and Incapacity Benefit make up the largest share of out of work benefits claimed in Southwark, at 6%. Compared with the London-wide figures, Southwark is higher by at most 2%. The figures for UK as a whole are generally higher than London and in some cases Southwark also.<sup>48</sup>

### **Supply and demand for office space (Use Class B1) in Southwark**

- 3.3.13. The Southwark Employment Land Review (2010) (ELR) distinguishes Southwark’s office supply into two distinct markets: SE1 and local. The SE1 market, extending within the Central Activities Zone (CAZ) within Borough, Bankside and London Bridge and the northern area of Elephant and Castle is considered the prime office location in the borough. This is due in part to the proximity to other large corporations and high accessibility by public transport. This section of central London, outside of the wider West End, in the City of Westminster and the London Borough of Camden, combined with the financial centre of the City of London, is often known as the City Fringe.
- 3.3.14. The second, “local” market attracts small-to-medium sized businesses generally seeking more affordable office stock. The businesses that require such space typically provide services to other local businesses such as information technology companies, creative industries, public sector organisations and professional services.

- 3.3.15. The analysis of the local market showed that, although there is a supply of premises that could accommodate some of this demand for B1 office floor space, the quality of these premises does not meet the needs of potential occupiers. SMEs generally require flexible space and incubator units capable of possible expansion with premises with good visibility from the road, DDA compliance and good accessibility. The ELR identifies that the majority of SMEs are searching for premises between 200m and 500m<sup>49</sup>. There is currently a mismatch between supply and demand in the local office market, whereby the relatively low quality/older supply is not suited to the characteristics of demand i.e. good-quality modern units. This mismatch is set to continue owing to the lack of suitable developments in the pipeline and problems converting existing stock to higher grade provision.
- 3.3.16. The London Office Policy Review 2012 (LOPR) is the most recent in a series of independent reviews of office market trends commissioned by the GLA. It includes a review of office-based employment projections and office floor space need estimates to inform future alterations to the London Plan. The LOPR estimates future demand of between 430,000sqm and 599,000sqm of office space between 2011 and 2036<sup>50</sup> in Southwark. This is partly based on Southwark's total employee numbers increasing from 197,000 in 2013 to 227,000 in 2036, representing an increase of 15%.<sup>51</sup>
- 3.3.17. Between 2011/12 and 2013/14 a gross amount of 23,405 sqm of B1 floor space was delivered in the borough. Over 163,500 sqm is currently under construction, while 77,150sqm has planning permission.<sup>52</sup> Combined, this gives a pipeline figure of close to 241,000sqm. This equates to roughly half of the estimated demand as projected in the LOPR 2012 (2014 update). However, it is important to note that these figures are gross rather than net and only take into account planning permissions that add a gross amount of B1 floor space of 1,000 sqm or more.
- 3.3.18. Net figures for B1 office floorspace show an overall loss in the past three years. There has been an overall loss of over 15,000 sqm of B1 office floorspace in Southwark between 2011/12 to 2013/14.<sup>53</sup>
- 3.3.19. The ELR suggests that there are a considerable and growing number of Small and Medium Enterprises (SMEs) that create 'localised' demand for B1 floor space in Southwark. The ELR projects a demand for an additional 25,000sqm to 30,000sqm of B1 office floor space in the borough from 2009 to 2026, purely to cater for the local office market in areas with good transport accessibility and supporting shops and services. Since 2010/11, over 16,000 sqm (gross) of B1a office floorspace has been delivered outside the CAZ. This translates to over 3,600sqm net.<sup>54</sup> This equates to an average of 5,400 sqm per year (gross) and over 1,200sqm (net) per year. Counting the net figure only, if this level of B1a floor space provision to continues, up to 2026, Southwark would have met only 58% of estimated minimum demand.

3.3.20. With SMEs making up over 99% of businesses in Southwark, the council is conscious that a steady supply of flexible, modern office space under 500 sqm is required to meet demand. A recent success story, that has the potential to be replicated elsewhere in the borough, is the completion of the Clarence Centre for Enterprise and Innovation. Part of the London South Bank University campus in Elephant and Castle, this development offers flexible, “incubator” small business units while also housing the universities business and enterprise research teams, producing a symbiotic relationship between the two. The facility also includes retail, café and gallery space as well as landscaped open space.<sup>55</sup>

### **Industrial/Warehouse and Distribution (Use Class B2 and B8)**

3.3.21. Clusters of industrial and warehousing areas are focused around the major transport infrastructure in the borough. This includes the Old Kent Road (A2) in the north of the borough, leading from New Cross to Elephant and Castle, and the North Kent rail freight line (South East Bermondsey). Other established industrial areas include the Rotherhithe Road and Lovegrove Estates, Glengall Road and Mandela Way distribution/warehousing centre. There are also older self-contained clusters in the south of the borough such as Parkhouse Street.

3.3.22. The ELR confirms that the local market supply of industrial and warehouse property in the borough has been declining in recent years as land has been lost to other uses. This has occurred where there has been a lack of demand for sites/premises, mostly for B2 (industry), where they are outside the main employment areas. Despite the supply of industrial and manufacturing premises declining, there is still demand for new high specification B8 (warehousing and distribution) premises. The decline in B2 premises is linked to economic change and the trend of disappearing manufacturing companies from inner London. The increase in demand for B8 stock can be partly linked to the increase in the central London office market and its supply needs.

3.3.23. The 2014 Southwark Industrial and Warehousing Land Study acknowledges that there are structural changes to Southwark’s industrial employment and use of industrial land. For example, the study found that the use of industrial sites in Southwark is diversifying, with a decline in the traditional manufacturing sector and (relatively) higher-value activities, which have a higher employment density and are focused on serving central London, are moving in their place. Businesses, primarily smaller, productive businesses are moving from other parts of London into Southwark, with certain clusters forming in certain areas. Technology, such as computer aided design and manufacturing is having a “democratising” effect, supporting a new generation of “makers.” The study concludes that the presence of industrial land capacity should be seen as a significant positive in attracting this sector, which is seen to be a key component of London’s future knowledge based economy. However, it is also acknowledged that the right type of industrial/employment floor space to meet the needs of this sector is in short supply in London, especially in locations with good accessibility.<sup>56</sup>

3.3.24. In 2006 the borough had approximately 389,000sqm of B2 floor space, with the majority located in the Old Kent Road and South East Bermondsey “preferred industrial locations” (PILs). In the same year Southwark contained approximately 602,000sqm of B8 floor space. In 2008 this reduced to 357,000sqm of B2 and 594,000sqm of B8.<sup>57</sup> The ELR estimates that Southwark can afford to release between 16.7ha and 23.7ha of industrial and warehousing land between 2011 and 2026. Between 2006 and 2010, the borough had already experienced a net loss of 24.9 hectares of B2/B8 land. The 2011-2031 quantum of industrial land release recommended for Southwark set out in the Mayor’s Land for Industry and Transport SPG (2012) amounts to a further 25 ha over this period.<sup>58</sup>

### **Industrial/Warehouse and Distribution development**

3.3.25. Between 2011/12 and 2013/14 Southwark saw a net increase of 190 sqm of B2 floor space. Between 2004/05 and 2013/14 only one year (2006-07) saw a net loss of B2 floor space of close to 2000 sqm. 2009/10 and 2012/13 both saw net increases of over 1,400sqm and 190 sqm, respectively. No other years since 2004/05 saw a net change in B2 floor space provision.<sup>59</sup>

3.3.26. B8 (warehousing and distribution) floor space has seen significant losses over the past three financial years, with close to 29,000 sqm lost through redevelopment. This equates to 2.9ha and is below the suggested guideline release rate of between 1.1 ha and 1.5 ha per year. Southwark still protects this type of employment space through planning policy in the PILs. The majority of developments resulting in a B8 loss were outside of PILs. These developments included the creation of a mix of uses. This has included new provision of retail, offices, gallery space and/or homes. 15 of the 30 of the developments with a loss of B8 floor space completed in the past three financial years have been in the SE1 area. This includes development around Long Lane and Bermondsey Street, and change of use in some of the many railway arches and industrial estates.<sup>60</sup>

### **Retail and commercial floorspace**

3.3.27. Southwark has a total of close to 270,500 sqm of commercial floor space within its town centres and other undesignated clusters. 44% of the actual sales floor space in the borough is for food and convenience goods (essential every day items) shops, while 56% of retail floor space is for non-essential, comparison goods.<sup>61</sup> Southwark’s town centres are partially defined by the existing amount of commercial floor space. These include:

- Mayor town centres: Peckham (50,000 sqm), Elephant and Castle/Walworth Road (69,000sqm) and Canada Water (37,000 sqm) or;
- District centres: Borough/Bankside/London Bridge (25,000 sqm), Camberwell (18,000 sqm) and Lordship Lane (in Dulwich) with 15,000 sqm) or;
- Local centres: Nunhead Green/Evelina Road, Dulwich Village or the Blue, Bermondsey

3.3.28. Excluding food stores, Southwark has around 60,000 sqm net of convenience sales floor space in its town centres, relatively evenly spread between them. Southwark is well served by convenience food “superstore” supermarkets (of over 2,500 sqm net), having five within its boundaries as well as having 10 large supermarkets over 1,000 sqm net, and three between 500 sqm net and 1,000 sqm net.<sup>62</sup>

3.3.29. Comparison goods floor space (items such as clothes, shoes, music and books) is estimated to be approximately 93,100 sqm net across the borough. Peckham is the main centre for comparison goods floor space, taking 21% of the share. 18% lies in Elephant and Castle/Walworth Road, and 15% in Canada Water. Outside of the town centres Old Kent Road accounts for under 19% of comparison sales floor space.<sup>63</sup>

3.3.30. Peckham, Elephant and Castle/Walworth Road and Canada Water all have a similar proportion of comparison goods shops when compared with the national average. Borough/Bankside and London Bridge both have less than half the national average.<sup>64</sup>

### **Retail spending patterns and forecasts**

#### Convenience shopping

3.3.31. Across the borough, retention of convenience shopping expenditure is above 80%. This comparatively high figure means that 80% of the population’s expenditure available for convenience goods is spent in Southwark, meaning Southwark successfully caters for every day needs, particularly considering the presence of large food stores just outside of Southwark’s boundary in Lambeth and Lewisham.<sup>65</sup>

#### Comparison shopping:

3.3.32. The retention of comparison goods expenditure is lower than the convenience goods shopping expenditure because residents are willing to travel further to get a better deal on items. For example Southwark residents are drawn to the West End (defined in the London Plan as an “International Centre”) and the “metropolitan centres” of Bromley and Croydon (with a significantly larger catchment area than any major centre in Southwark). In the south of the borough, 38% of resident’s capacity for comparison goods expenditure is retained in the borough, compared with 61% in the north of the borough.<sup>66</sup>

### **Future retail expenditure and floor space demand**

3.3.33. Forecasts for spending on convenience goods in Southwark is set to increase by 22% from £1,185m in 2014 to £1,443m in 2031. Comparison goods spending is forecast to increase by 91% in the same period from £1,962m to £3,741m\*. Taking into account existing planning permissions and developments currently under construction, it is estimated that to meet demand up to 2031, an additional 310 sqm net of convenience floor space will need to be delivered in the borough each year. By 2031 this would total 5,280 sqm of net convenience goods floor space. To meet estimated demand for comparison goods floor space in the borough, it is proposed that an additional 25,422 sqm of net comparison goods floor space is delivered in the borough by 2031, equating to 1,500sqm each year.<sup>67</sup>

3.3.34. The Old Kent Road has been designated as an “opportunity area” by the Mayor of London in the Further Alterations to the London Plan (2015). This means the Mayor expects the area to accommodate a minimum of 2,500 new homes and 1,000 new jobs. Depending on the area’s population in 2031, the area could potentially accommodate both convenience and comparison goods space.

\*It should be noted that comparison goods spending is forecast to increase more than convenience spending as the amount spent on food and beverage does not increase proportionately with disposable income, whereas spending on non-food goods is more closely linked to income.

### **Food/Beverage and Other Town Centre Uses**

3.3.35. Nationally, the proportion of units that are non-retail (i.e. including some A1 uses, as well as A3 - restaurants and cafes, A4 – drinking establishments, and A5 – hot food takeaways) has increased significantly in recent years, with a high demand for such services in town centres. The current national average for the proportional split between A1 (retail and non-retail) and other commercial A-Class uses is 77% versus 18%.<sup>69</sup>

3.3.36. In Southwark, there is currently a more balanced mix of commercial uses within the designated town centres. Peckham has the highest proportion of A1 retail (71%) and A1 non-retail but a low proportion of drinking establishments (1%). 66% of units in Elephant and Castle/Walworth Road are A1 (with 51% retail and 15% non-retail). There is a smaller proportion of A1 units in Canada Water town centre (at 57%). The district town centres have a higher proportion of units in A3/A4/A5 units, totalling 34.4% versus the major town centres’ average of 19% and local centres’ 23%. The current retention rate for food and beverage expenditure varies across the borough from 52% to 60% in different areas. While this is reasonably high, there is scope to increase the retention rate through new development.<sup>70</sup>

3.3.37. It is estimated that Southwark will need an additional 9,300 sqm (gross) of food and beverage floor space by 2031 to meet demand. Depending on the future population of the area and its potential designation within the town centre hierarchy, the Old Kent Road also has the potential to increase its food and beverage offering.

3.3.38. Use Class A2 equates to “financial and professional services.” This includes banks, building societies, estate agents and employment agencies as well as betting shops and pay day loan shops. They account for 9% of all units in Southwark’s town centres. They make up a slightly higher proportion of units in district and local centres, at 10%, than in major centres where they occupy 8% of units.<sup>72</sup>

3.3.39. Southwark’s 43 betting shops which are located within town centres account for 26% of all A2 uses and 2.4% of all A Class units. This is significantly higher than the national average of 1.5%. Peckham, Walworth Road, Camberwell and the Blue together have 28 betting shops between them, taking up the majority share of the borough’s stock. 11 of Southwark’s 15 payday loan shops are also concentrated in Peckham, Walworth and Camberwell.<sup>73</sup>

3.3.40. Southwark's 37 banks/building societies are concentrated in Peckham, Borough/Bankside and Camberwell, together having 18 of the 37 units in those town centres. Estate agents are also concentrated in Borough/Bankside and Camberwell, however the highest concentrations are in Canada Water and Lordship Lane. Together, these estate agents account for 36% of all A2 units in the borough's town centres, and 3.2% of all A Class units.<sup>74</sup>

### **Development of Commercial (Use Class A1, A2, A3, A4, A5) Floor Space**

3.3.41. Between 2011/12 and 2013/14 a net total of over 5,100 sqm of A1 floor space was delivered in the borough, giving an average of close to 1,600 sqm each year. During the same period, there was only 169 sqm of new build A2 floor space added in the borough in the same years. There was close to 1,200 sqm of new A3 floor space created, giving an average of close to 400sqm per year. There was a significant net loss of A4 floor space, with over 6,900 sqm lost between 2011/12 and 2013/14, equating to over 2,300 sqm per year.<sup>75</sup>

### **Hotels and Serviced Apartments**

3.3.42. With London being one of the most visited cities in the world, a significant part of its economy and employment capacity is defined by the tourism sector. To maintain this important part of the city's economy, it is essential that there are enough hotel rooms to meet demand. It is estimated that there were 112,300 serviced rooms in London in 2010<sup>76</sup>. The GLA's Hotel Demand Study (2006) showed that Southwark could expect to deliver 2,500 new hotel rooms between 2007 and 2026<sup>77</sup>. Between 2007/08 and 2013/14, 1,956 new hotel rooms (including serviced apartments) were delivered in the borough<sup>78</sup>, accounting for 78% of the estimated 20 year requirement in 7 years. An updated review on the supply and demand for hotel rooms has revised potential demand in Southwark's down to 1,800 rooms between 2013 and 2036<sup>79</sup>. This equates to an average of 138 rooms per year.

3.3.43. During 2013/14, two new hotels/serviced apartment complexes and two hotel expansions were completed, delivering a total of 172 rooms. Between 2011/12 and 2013/14, 7 new hotels/serviced apartment complexes were completed, and three existing hotels were expanded, bringing the total amount of rooms to 1,162. The overwhelming majority of these have been in the SE1 area, with large examples including Novotel on Blackfriars Road, the (Tate Modern) Premier Inn on Great Suffolk Street, and Citizen M on Lavington Street/Southwark Street. There are currently 1,281 hotel/serviced apartment rooms under construction in the borough, all in SE1.<sup>80</sup>

### **Commercial Leisure Uses**

3.3.44. Commercial leisure uses (also known as Use Class D2 – “assembly and leisure”) includes cinemas, theatres, bowling, bingo halls, health and fitness clubs. There is a high concentration of such uses in the north of the borough, particularly in a larger scale in Canada Water as part of the Surrey Quays Leisure Park. These types of uses and facilities can greatly enhance the liveability of a place and are an important part of the borough's cultural and entertainment and leisure offering.

3.3.45. Southwark's three cinemas are located at Surrey Quays Leisure Park, Peckham Multiplex and Short Wave in Bermondsey Square. There are currently two cinemas with planning permission in the borough in Dulwich in the south and as part of the redevelopment of the former Castle Industrial Estate on New Kent Road.

3.3.46. Southwark has a rich history of theatre. Theatres in Southwark include Shakespeare's Globe, The Rose, The Union, The Unicorn, Coronet, Southwark Playhouse, Theatre Peckham and Menier Chocolate Factory. Southwark currently has two bowling facilities, the Hollywood Bowl in Surrey Quays and Palace Superbowl in Elephant and Castle, totalling 54 lanes. Southwark also has two bingo halls, in Elephant and Castle and Surrey Quays.

3.3.47. Health and fitness clubs have expanded rapidly as public awareness about personal fitness has increased. The provision of health and fitness facilities can be, amongst other factors, a key determinate in increasing the opportunity to improve health and well-being through regular exercise. Southwark is well served by health and fitness facilities evenly throughout the whole of the borough. In total there are 11 private health clubs alongside 8 Southwark Council operated leisure centres. The new Castle leisure centre at Elephant and Castle is currently being redeveloped and will open in spring 2015. Camberwell leisure centre was recently refurbished to provide improved facilities including a youth centre area.

3.3.48. Between 2011/12 and 2013/14 a net total of over 5,500 sqm of D2 floor space was provided in Southwark, equating to over 1,800 sqm per year. This includes four new gyms/health and fitness clubs which were delivered.<sup>81</sup>

### 3.4. ENVIRONMENT CONDITIONS

#### Climate change and Carbon Dioxide

3.4.1. Available scientific evidence supports the current understanding that global warming causes climate change. If global emissions of greenhouse gases due to human activity continue at today's levels, then average global temperatures could rise by 4°C by as early as 2060 and up to 6°C by the end of this century<sup>1</sup>. This has an adverse impact on weather patterns (including rainfall intensities and frequencies), and effort needs to be made to address this.

3.4.2. Carbon is emitted when fossil fuels are burnt. The table below gives a breakdown of where Carbon emissions come from in the borough.

<b>Built Environment</b>	<b>84%</b>	<b>Transport</b>	<b>16%</b>
Work places	54%	Cars and motorcycles	8%
Homes	30%	Freight	4%
		Public transport	3%
		Taxis	1%

Source: Southwark Energy and Carbon Reduction Strategy 2011

3.4.3. In 2006, Southwark adopted a climate change strategy that aimed to reduce CO<sub>2</sub> emissions across the borough by 80% by 2050 and to pursue a decentralised energy strategy for the borough. Since then, climate change has risen considerably up the political agenda. In 2008, the government set legally binding reduction targets (34% by 2020 and 80% by 2050 on 1990 levels) and a new set of policies and financial mechanisms have been developed to effect the change required. However, since 2006 the economic downturn occurred and little movement has been recorded in the level of borough emissions. The council target set in 2006 was highly ambitious and based on optimistic assessments of the various energy reductions scenarios in existence at the time, and the capacity of the council and partners to deliver. Whilst the 2006 target remains the Council's long term goal, a set of interim targets were agreed by the Council in 2011, which reflect the current financial climate and give a clearer view of the energy reduction measures that are implementable in the medium term.

3.4.4. The proposed new targets are set out in the right hand column of the table below;

#### CO<sub>2</sub> Baseline data

	Baseline (tCO <sub>2</sub> )	Current (tCO <sub>2</sub> )	Original target	Percentage Reduction to date	New proposed target
<b>Council operational estate and schools</b> (2008/9 baseline)	41,036	37,441	N/a	8.4%	<b>26.6% reduction by 2016</b>
<b>Council Housing</b> (2005 baseline)	202,800	187,850	N/a	6.7%	<b>15% by 2022</b>
<b>Borough</b> (2003 baseline)	1,690,000	1,671,020	80% reduction by 2050	1.1%	<b>22.4% reduction by 2020</b>

Source: Southwark Energy and Carbon Reduction Strategy 2011

3.4.5. The NPPF states that local planning authorities should support the move to a low carbon future and increase the use and supply of renewable and low carbon energy. This includes through a combination of energy efficiency, onsite energy supply and/or (where relevant) directly connected low carbon or renewable heat.

3.4.6. Overall, the most substantial emissions savings London can make will come from initiatives to decarbonise its energy supply and to reduce the emissions from the existing building stock.

3.4.7. The Mayor supports the greater use of renewable and low carbon generation technologies, and has set a target for London to generate 25 per cent of its heat and power requirements through the use of local, decentralised energy (DE) systems by 2025. DE generates power at point of use, making more efficient use of primary energy by utilising generated heat that would otherwise be wasted in large-scale thermal power generation plants. The scale of opportunity can vary from Combining Heat and Power (CHP) systems on specific development sites, through town centre wide district energy projects.

3.4.8. A number of new heat networks or district heating schemes are being actively explored in the borough, in particular where there are large scale regenerations schemes – Elephant and Castle zero carbon growth/ the Aylesbury regeneration, north Southwark (SBEG) and a heat pipe to utilise waste heat from the SELCHP incinerator and displace the gas currently used to heat five Council estates. As part of a project to develop a heat map for the capital, the London Development Agency/ GLA identified the following areas as being particularly suited for new district heating schemes: Canada Water; North Southwark; Bermondsey; Southhampton Way Spa; Camberwell; Surrey Gardens; Peckham.

3.4.9. All new major developments are expected to meet the targets set out below. These targets are expressed as minimum improvements over the Target Emission Rate (TER) outlined in the national Building Regulations leading to zero carbon residential buildings from 2016 and zero carbon non-domestic buildings from 2019.

<b>Residential buildings:</b>	
Year	Improvement on 2010 Building Regulations
2013 – 2016	40 per cent
2016 – 2031	Zero carbon
<b>Non-domestic buildings:</b>	
Year	Improvement on 2010 Building Regulations
2013 – 2016	40 per cent
2016 – 2019	As per building regulations requirements
2019 – 2031	Zero carbon

3.4.10. The Mayor has outlined in the Climate Change Mitigation and Energy Strategy projections for the installation of different renewable energy technologies to increase London’s generation of both electricity and heat from such sources up to 2031. The Government has adopted a UK wide target for 15 per cent of total energy to be generated by renewable sources by 2020, and these projections represent London’s contribution to this 2020 target and beyond. In Southwark, there is a presumption that all major development proposals will seek to reduce carbon dioxide emissions by at least 20 per cent through the use of on-site renewable energy generation wherever feasible. Development proposals should seek to utilise renewable energy technologies such as: biomass heating; cooling and electricity; renewable energy from waste; photovoltaics; solar water heating; wind and heat pumps.

3.4.11. National Grid’s high voltage electricity overhead transmission lines / underground cables within Southwark’s administrative area form an essential part of the electricity transmission network in England and Wales including a 275kV underground cable from Newcross substation (on the Old Kent Road) in Southwark to Wimbledon substation in Wandsworth as well as existing gas holders on the same site on the Old Kent Road.

- 3.4.12. London's transport-related CO<sub>2</sub> emissions are predicted to fall by 16% by 2025, despite projected population and employment growth in excess of 10%. Drivers of this reduction include the on-going long-term trend of vehicle fuel efficiency improvements driven by EU legislation, regional measures to drive modal shift, the decarbonisation of grid electricity and related incentives for electric vehicles and UK policy to increase the share of bio-fuel in transport fuel from 5 to 10% in the lead up to the 2020 renewables target. The council already has a comprehensive focus on encouraging modal shift. This includes managing demand via car clubs, investing in cycling and walking infrastructure, cycle parking and working with public transport providers; encouraging sustainable travel choices through school and workplace travel plans and encouraging smarter driving to reduce emissions and improve air quality.
- 3.4.13. With 86.5% of the borough's carbon emissions not directly controlled by the Council, meeting CO<sub>2</sub> reduction targets will only be fully achieved by influencing the borough's businesses, residents, landlords and building owners.
- 3.4.14. The scale of regeneration and estate renewal planned across the borough means that housing and commercial uses in particular will need to make a very large contribution to achieving our climate change targets. The Core Strategy requires new housing to meet Code level 4 and commercial development to meet BREEAM 'excellent'. Meeting these targets will help achieve Government targets to reduce CO<sub>2</sub> emissions from new development in accordance with the building regulations.

#### **Water resources and quality**

- 3.4.15. London's consumption of water already outstrips available supplies in dry years and ensuring a sustainable and secure water supply has to be an urgent priority. Some steps have already been taken. To remain sustainable London needs to reduce the level of water consumption per person. Currently the average Londoner consumes 164 litres/day (l/d) around 20 l/d, above the national average of 150 l/d. Projections for population growth in London and in the wider south-east will mean that new strategic water resources will be required. The need for this is exacerbated by the climate change predictions of more sporadic and intense rainfall and a higher likelihood of droughts, as well as the need to protect the water environment following Water Framework Directive requirements.
- 3.4.16. Thames Water currently supplies water to Southwark. Thirty-five per cent of the water Thames water supplies is pumped from natural underground reservoirs called aquifers. The other 65 per cent is pumped from rivers. However, the vast majority of river water is supplied from aquifers, making groundwater the most important source of water.
- 3.4.17. Currently, all mains water is treated to drinking standard. This is an expensive and energy intensive process, particularly considering that at least 40% of water consumed in homes and workplaces does not need to be of drinkable quality (for example water used for flushing toilets, washing laundry and watering parks and gardens). The current policy target for major housing development is to achieve a potable water use target of 105 litres per person per day.

3.4.18. The council is committed to implementing initiatives to reduce water demand which would include implementing methods for efficiently using local groundwater resources where possible for non-potable uses across the borough.

3.4.19. Influencing consumer behaviour is recognised as being vital to the success of an integrated water management programme and in this regard the Council are working closely with the GLA, the Environment Agency, Thames Water and its community to promote water saving schemes and education programmes. In addition, initiatives to eliminate leakage associated with aged pipe work are planned. There will also need to be significant investment in new potable and non-potable water distribution mains.

### **Waste management**

3.4.20. Government has set targets for local authorities to increase recycling rates and reduce the amount of waste going to landfill. The Mayor has also set waste targets for boroughs through the London Plan including the need to allocate enough land to process at least 243,000 tonnes (municipal as well as commercial) of waste by 2016, at least 275,000 tonnes by 2021 and at least 343,000 tonnes of waste by 2031. This will help meet the London-wide target of processing at least 85% of the city's waste within London by 2020.

3.4.21. Southwark's Waste Management Strategy, 2003-2021 sets out the council's proposals for moving Southwark towards more sustainable waste management. The key features include:

- A reduction in the amount of municipal solid waste generated in Southwark to below 3% by 2005, and below 2% by 2010. In real terms, due to population growth the absolute amount of waste will rise but the strategy aims to deliver a decrease in the actual rate of growth.
- Achievement of 30% recycling and composting standards for household waste by 2010-11 and 40% by 2015-16 and 50% standards by 2020-21
- Recovery of value from 45% of municipal solid waste by 2010-11, 67% by 2015-16 and 75% by 2020-21.

#### Current performance

	2010/11	2011/12	2012/13
Total household waste collected (tonnes)	110,236	106,121	111,081
Recycling and composting rate (%)	25.14%	27.43%	30.41%
Amount of municipal waste diverted from landfill (recovery rate %)	63.34%	79.65%	69.49%

- 3.4.22. To help deliver the council's strategic goals, a 25 year PFI contract was entered into in 2008 between the council and Veolia Environmental Services. Under the terms of the integrated contract, Veolia undertake all our waste and recycling collection, treatment and disposal operations.
- 3.4.23. In addition, a state of the art integrated waste management facility is now in operation on the Old Kent Road, and is being operated by Veolia. It is providing the required improvement in waste infrastructure identified by the council in its strategy. The new facility is playing a central role in helping to reduce the impact that Southwark's waste has on the environment. It is made up of several different facilities, including: Mechanical Biological Treatment Plant to treat residual waste; Materials Recovery Facility to sort commingled recyclables; Reuse and Recycling Centre for residents to deposit a wide range of items of household waste and recycling; Waste transfer station; Recycling Discovery Centre (Education Centre).
- 3.4.24. It is expected to facilitate a significant improvement in the borough's recycling levels as well as diverting most of the waste that would previously have gone to landfill. The new facility will help to meet Southwark's waste apportionment targets by processing 88,350 tonnes of waste per annum with the potential to treat further waste by converting it into biomass fuel. Using the GLA's generic standard, the residual part of the Old Kent Road gasworks site (5.4ha), may be capable of processing 286,200 tonnes of waste per annum.

### **Flood Risk**

- 3.4.25. The primary sources of flood risk in the borough are surface water, groundwater, tidal, failure of water mains and sewers. Historically, there have been some recorded tidal flooding incidents from the River Thames dating as far back as 1828 to vulnerable communities. Tidal flooding also occurred in 2005, when the Thames Barrier was not shut in time, and sufficient warning was not provided to local residents close to the floodgates prior to the onset of flooding, causing flooding along the Southwark frontage and into some basements to a depth of between 4 and 6 inches.
- 3.4.26. The northern half of the borough is within the Thames flood plain, which contains over two thirds of Southwark's properties in well established communities. A large part of the borough is located within the indicative flood zone 3, which has the highest level of risk. The flood plain area also contains major regeneration and growth areas of importance to Southwark and London. However, it should be noted that all of the land in the borough is defended by the Thames Barrier and defences so that the risk from tidal flooding is a residual risk.
- 3.4.27. The Government (and the Environment Agency) would like to see all development located in areas of low flood risk (zone 1). This is not always going to be possible and so new development will need to be directed to sites where the risk of flooding is appropriate to the "vulnerability" of the land use proposed. The Environment Agency has produced Flood Risk Maps. This map designates land in the borough in one of three zones:
- Zone 1 – land at low risk of flooding from the Thames (land south of Camberwell and Peckham)
  - Zone 2 - land at medium risk of flooding from the Thames (not much of this land in the borough)

- Zone 3 – land at high risk of flooding from the Thames (this is in the north of the borough and includes the Central Activity Zone, Elephant and Castle Opportunity Area and Bermondsey and Canada Water)

3.4.28. The Thames Catchment Flood Management Plan and Thames Estuary 2100 Project will help manage flood risk from the Thames over then next 50 to 100 years. Whilst the Thames Barrier and flood walls along the riverside provide a degree of protection, consideration needs to be given to their potential failure or inability to contain very high floods as a result of climate change.

3.4.29. The existing Strategic Flood Risk Assessment (SFRA) for the borough was prepared in 2008, and in line with the Flood Risk Regulations (Clause 17.4). A subsequent review is now required and will be prepared in 2015. This will be used to inform the flood risk policies in the emerging Local Plan (the New Southwark Plan). The primary objective of the SFRA is to inform the revision of flood risk policies, including the allocation of land for future development, within the emerging NSP. The SFRA has a broader purpose however, and in providing a robust depiction of flood risk across the borough, it can:

- Inform the development of Council policy that will underpin decision making within the borough, particularly within areas that are affected by (and/or may adversely impact upon) flooding;
- Assist the development management process by providing a more informed response to development proposals affected by flooding, influencing the design of future development within the borough;
- Help to identify and implement strategic solutions to flood risk, providing the basis for possible future flood attenuation works;
- Support and inform the Council's emergency planning response to flooding.

3.4.30. Two thirds of the potential development sites identified in Issues and Options NSP paper (October 2014) are located in flood zone 3. These sites have been identified to potentially deliver more homes to meet housing needs in the borough. In the southern parts of the borough, where flood risk from the Thames is low, there are limited sites available for development. It is important that new buildings are designed to be safe in the event of a flood and easily repairable afterwards.

### **Local Flood Risk**

3.4.31. Climate change can affect local flood risk in several ways. Impacts will depend on local conditions and vulnerability. More intense rainfall causes more surface runoff, increasing localised flooding and erosion. In turn, this may increase pressure on drains, sewers and water quality. As London has become densely populated, green spaces such as gardens and parks act as big sponges for rainwater but in very heavy rain these can quickly become saturated creating a 'run off' of excess water.

- 3.4.32. Within Southwark the greatest number of residential and non-residential uses are at risk from significant surface water flooding (>0.5m) along the route of the 'hidden' River Effra and the River Peck and tributaries which run south to north through the borough. Significant ponding of surface water is also apparent along the central belt of the borough in the Camberwell and Peckham areas. Historic surface water flooding records indicate sewer flooding risk in the Dulwich area. Surface water also flows from Southwark and impacts downstream surface water flooding in the Lambeth in the south Brixton area it will therefore be important that the flood risk is managed at a catchment scale by both Councils.
- 3.4.33. The Council has undertaken a Surface Water Management Plan for the whole borough which includes consideration of flooding from sewers, drains, groundwater and runoff from land, small watercourses and ditches that occurs as a result of heavy rainfall. Analysis of the number of properties at risk of flooding has been undertaken for the rainfall event with a 1 in 100 probability of occurrence in any given year (1% Annual Exceedance Probability, AEP). A review of the results demonstrate that 33,220 residential properties and 2,870 non-residential properties could be at risk of surface water flooding of greater than 0.03m depth during a rainfall event with a 1 in 200 annual chance of occurring. Of those, approximately 560 residential properties and 80 non-residential properties are estimated to be at risk of flooding to a depth of greater than 0.5m during the same modelled rainfall event.
- 3.4.34. The output of the modelling exercise has been used to identify Local Flood Risk Zones (LFRZs) which represents an area of predicted flooding. The LFRZs identified in the borough include; Herne Hill; Kings College Hospital (Lambeth); Dulwich; Rail Cutting West of Denmark Hill Station; London Bridge Station and Guy's Hospital; Coleman Road / Newent; Comber Grove; South Old Kent Road Area and Brunswick Park.
- 3.4.35. Those areas identified to be at more significant risk, which require mitigation measures, have been labelled as Critical Drainage Areas (CDAs) which represent one or more LFRZs, their contributing catchment areas, and any features that may influence flooding within the CDAs. Within Southwark, 5 CDAs have been identified. These are Herne Hill, Central Southwark, Eastern Southwark, Camberwell and London Bridge, The assessment identified the southern part of the borough is at a higher risk than the northern part with 4 of the CDAs in the central to southern part of the borough and 1 in the north.
- 3.4.36. The council is already investing in flood alleviation measures, which will take place in Dulwich Park, Belair Park and Dulwich Sports Ground. These measures include:
- Building barriers or earth bunds which can temporarily contain or redirect surface water into existing water sources, for example lakes and ponds.
  - Increasing storage capacity of existing water bodies.
  - Constructing below-ground storage areas to provide further capacity to store flood water and provide an efficient outflow route from the park for storm water; the stored water is then released gradually back into the sewer network reducing the risk of sewer flooding.
  - Planting wetland wildflower meadows to attract wildlife, enhancing local habitats and biodiversity.

- 3.4.37. Southwark Council is responsible for managing the risk of flooding from surface and ground water in the borough. Thames Water is responsible for maintaining the sewer network across London. Together the Council and Thames Water are working in partnership, with the support of the Environment Agency.
- 3.4.38. A draft Local Flood Risk management strategy was published for consultation in October 2014. The strategy details how the council will manage the risk of flooding arising from surface water, groundwater and ordinary water courses across the borough consistent with the Flood and Water Management Act 2010 (“the Act”) and the National Flood Risk Management Strategy. It will ensure that flooding risks are well managed in a coordinated way to balance the needs of communities, the economy and the environment.

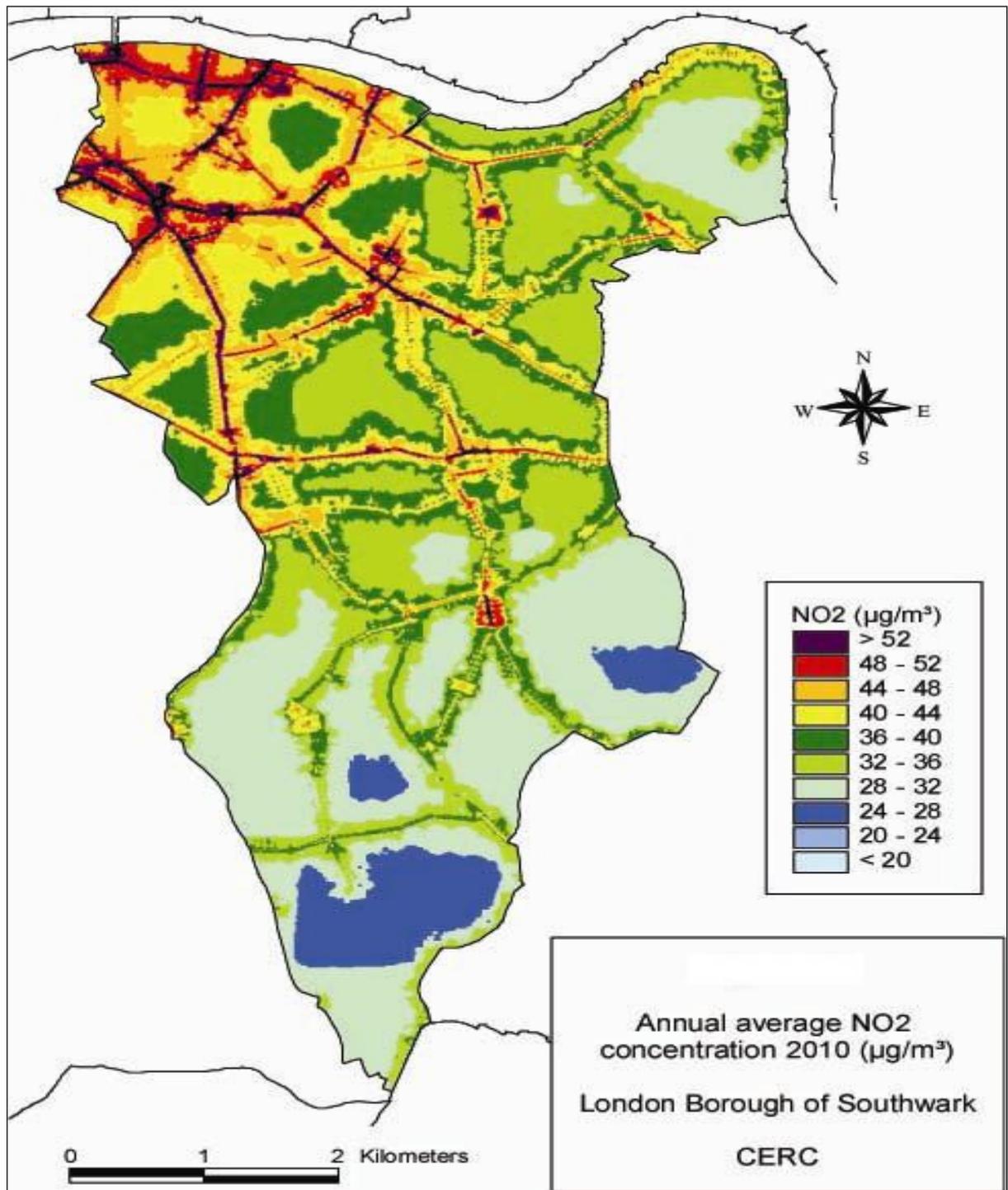
### **Sewerage**

- 3.4.39. The volume and frequency of untreated sewage overflowing into the River Thames is unacceptable and contravenes the European Urban Wastewater Treatment Directive. Thames Water has a programme to replace old Victorian Water mains and they are planning to build the Thames Tideway Tunnel, a 25 km tunnel which would run underneath London which will help to reduce the amount of sewerage overflowing into the river. The proposed route for the main tunnel will follow the route of the River Thames from Acton to Limehouse, where it then continues north-east to Abbey Mills Pumping Station near Stratford. There it will be connected to the Lee Tunnel, which will transfer the sewage to Beckton Sewage Treatment Works. A total of 24 sites in London are required to construct and operate the project.
- 3.4.40. The tunnel would be connected to approximately 34 'combined sewer overflows' (CSOs) which currently release raw sewage into the Thames after heavy rain fall. The proposed tunnel would intercept these sewage discharges and transfer them to the Beckton Sewage Treatment Works. The aim is to improve water quality in the Thames. The CSOs will still be needed after the Thames Tideway Tunnel has been built to direct flows to the River Thames in exceptional circumstances when the new tunnel system is full. This is only expected to occur very occasionally. Chambers Wharf is identified as a construction site for the Thames Tunnel project in Southwark.

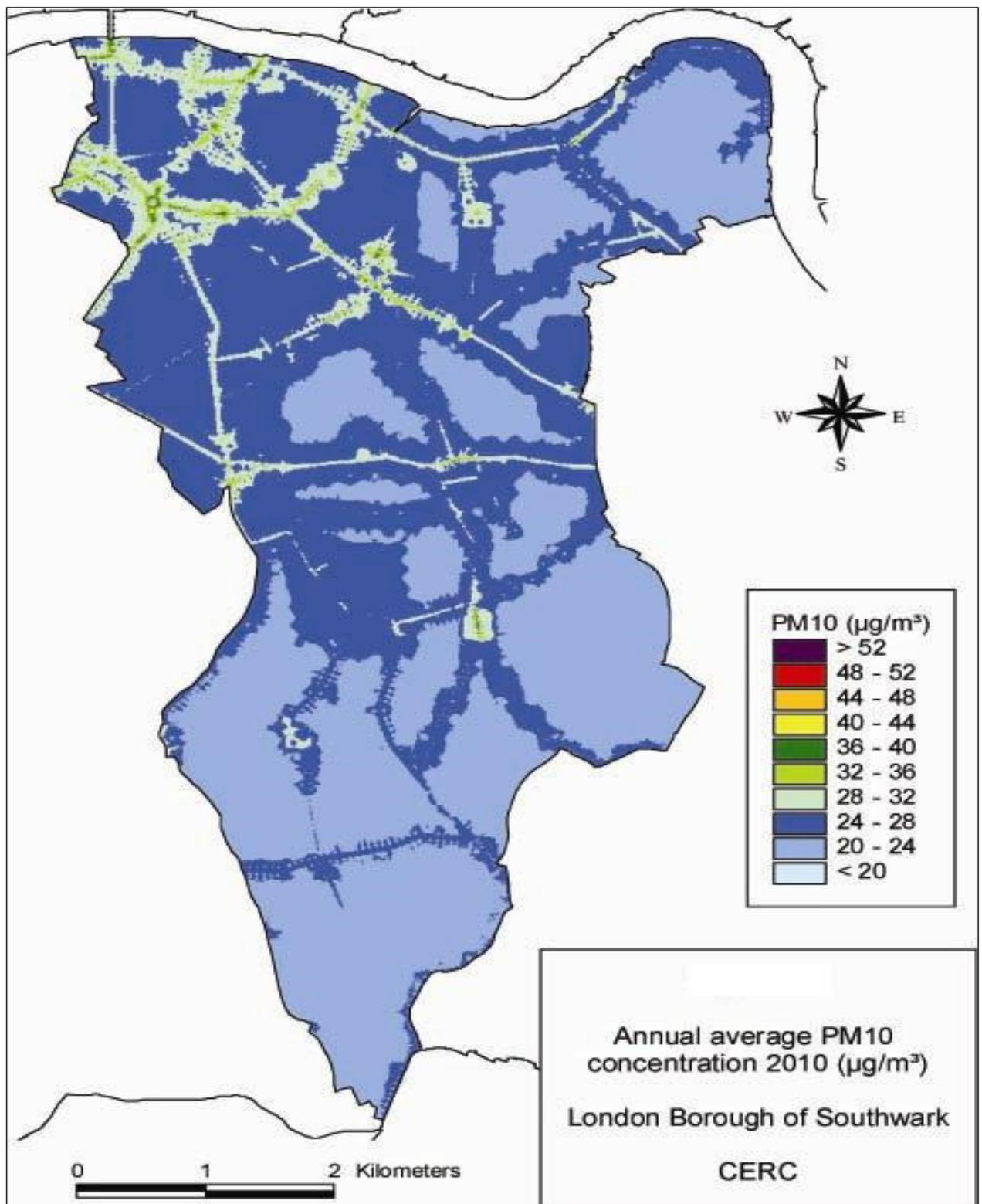
### **Pollution**

- 3.4.41. Vehicle emissions are the cause of 50% of air pollution and estimated to cause 24,000 deaths per year in the UK<sup>83</sup>. Southwark has particularly high levels of air pollution, mainly caused by traffic. As a result, the entire borough north of the A205 has been declared an Air Quality Management Area and the establishment of an Air Quality Strategy and Improvement Plan (AQSIP) has been undertaken.
- 3.4.42. Southwark is required to periodically review and assess the effectiveness of the AQSIP and do this through regular Update and Screening Assessments (USA). The last Southwark USA was undertaken in 2006 and this identified that only two of the set targets, those for particulate matter less than 10 microns in diameter (PM<sub>10</sub>) and nitrogen dioxide (NO<sub>2</sub>), would be exceeded<sup>84</sup>. NO<sub>x</sub> emissions are primarily nitric oxide (NO) but this is converted into NO<sub>2</sub> in the atmosphere through chemical reactions with ozone (O<sub>3</sub>). The figures overleaf show the modeled NO<sub>2</sub> and PM<sub>10</sub> concentrations in Southwark for 2010<sup>85</sup>.

- 3.4.43. The most significant local pollutants, NO<sub>x</sub> and PM<sub>10</sub>, are mainly associated with vehicular emissions, especially those of buses, lorries, coaches and taxis. It is envisaged that these pollutants will reduce significantly over the next 15 years, through initiatives such as the London Low Emission Zone which covers all of Southwark, limiting access to heavy vehicles that can demonstrate compliance with strict emissions criteria and technological advances in reducing exhaust emissions.
- 3.4.44. As part of the work to deliver the Mayor's Air Quality Strategy, Transport for London have identified 187 air quality focus areas where high concentrations of NO<sub>2</sub> coincide with high levels of human exposure, e.g. along high streets, near schools and at hospitals. Six of these air quality focus areas are in Southwark. These are:
- Walworth Road/Camberwell Road/Camberwell Green.
  - A2 Old Kent Road from East Street to Trafalgar Avenue.
  - Peckham High St and Clayton Road.
  - Tower Bridge Road A100.
  - London Bridge at Borough High Street.
  - Lower Road A200 Surrey Quays.
- 3.4.45. Concentrations are not simply a function of the level of traffic but determined to a significant degree by congestion. The greatest traffic flows are on the A2 towards Walworth Road east and south of the Elephant and Castle respectively. Although concentrations are high the along these roads, concentrations along roads with fewer vehicles are comparable, due to increased congestion<sup>86</sup>.
- 3.4.46. The council has installed two air quality monitoring stations in 2010 in the borough. These monitoring stations will collect information on NO<sub>x</sub> and PM<sub>10</sub> and are located at:
- Old Kent Road, by the gasworks
  - Elephant and Castle, at St Mary's Newington Church Yard
- 3.4.47. These two air quality monitoring stations, however, only provide details for those specific locations. To complement the stations, it is proposed to use the outputs from the council's traffic count programme to look at trends in road borne traffic. Although traffic counts do not directly measure air quality, they can be used as a proxy measurement if we assume that as traffic volume increases, air quality will decrease<sup>87</sup>.
- 3.4.48. The Mayor has also recently published a Transport Emissions road map which focuses on how to reduce emissions from ground based transport in London. The Mayor is developing a proposal for an Ultra Low Emission Zone (ULEZ) in Central London. The ULEZ would cover the Congestion Charging Zone and come into effect from 2020. Subject to public consultation, ULEZ would set an emissions requirement for all types of vehicles entering central London with charges for noncompliance, discouraging all but the cleanest vehicles. The Mayor's Transport Emissions road map has identified an opportunity to apply the principles of the ULEZ in other areas of London. This could be in the form of Low Emission Neighbourhoods (LENs), which would be targeted in local hotspot areas of poor air quality.



Source: Southwark Air Quality Strategy and Action Plan 2012



Source: Southwark Air Quality Strategy and Action Plan 2012

## Noise

- 3.4.49. Environmental Noise arising from transport and industry is an inevitable consequence of a vibrant urban society. Noise is subjective and different people react to it in different ways and what can cause annoyance to some people maybe barely noticeable for others. As the noise level increases it can interrupt conversation and disturb sleep. In general, noise can be classified into fairly broad categories; occupational noise, which is experienced at work, neighbour and neighbourhood noise, and environmental (ambient) noise.
- 3.4.50. The government published Noise Action Plans for agglomerations (large urban areas), major roads, and major railways in England in 2014, to meet the terms of the Environmental Noise (England) Regulations 2006, as amended, which transpose the Environmental Noise Directive (END). The purpose of Noise Action Plans is to assist in the management of environmental noise and its effects, including noise reduction if necessary, in the context of government policy on sustainable development. Noise Action Plans are based on the results of the strategic noise maps published in 2008. These Action Plans include details of the process for identifying important areas (noise 'hotspots') and an approach for identifying and managing quiet areas in agglomerations.
- 3.4.51. Managing noise includes improving and enhancing the acoustic environment and promoting appropriate soundscapes. Noise management includes promoting good acoustic design of buildings whenever opportunities arise. It will include traditional and innovative noise reduction measures in otherwise unacceptable situations.

## Soil and contaminated land

- 3.4.52. Contamination of land may threaten public health and safety, the natural environment, the built environment and economic activities, through its impacts on the users of the land, and on neighbouring users. The presence of contamination can affect or restrict the beneficial use of land, although development presents an opportunity to deal with it. Land contamination, or the possibility of it, is therefore a material planning consideration in the preparation of development plan documents and in taking decisions on individual planning applications.
- 3.4.53. "Contaminated Land" is defined in the Environmental Protection Act (1990) (with amendments made in the Environment Act 1995 (Part 2A) and the Radioactive Contaminated Land (Modification of Enactments)(England) Regulations 2006) as: *"Any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in on or under the land, that: Significant harm is being caused or there is a significant possibility of such harm being caused; or Pollution of controlled waters is being, or is likely to be caused"*
- 3.4.54. The real or perceived costs of treatment/remediation can act as significant barriers to successful development, particularly if the contamination issues and their solutions are not identified early and integrated into the scheme for development of the site. Where land is affected by contamination, development can provide an opportunity to address the problem for the benefit of the wider community and bring the land back into beneficial use.

3.4.55. In practice, most sites with a previous potentially contaminating history are remediated to a condition suitable for use under the planning regime rather than the Part 2A legislation. Part 2A legislation would not normally be applied to sites remediated as suitable for use under the planning process.

3.4.56. The redevelopment of previously developed sites is central to the achievement of the Government's objective of ensuring sustainable development. Such development minimises the need to develop 'greenfield' land.

### **Open Space and Biodiversity**

3.4.57. Southwark is a borough that has a wealth of open space of different types including woodland, parks, community farms, Thames-side paths, and sports pitches. The survey of open spaces we prepared for our Open Space Strategy (2013) identified 215 open spaces in the borough which together comprise some 605.5 hectares of land, around 21% of the total land area in the borough. Around 58% are publically accessible.

3.4.58. There are significant variations in the amount of open space available in each area of the borough. There are around 252 hectares of open space in Dulwich, compared to 10 hectares in Borough, Bankside and London Bridge. This is reflected in the amount of publically accessible open space per 1,000 population:

- Aylesbury and Walworth: 2.35 ha per 1,000 people
- Bankside, Borough and London Bridge: 0.36 ha
- Bermondsey and Old Kent Road: 0.18 ha
- Camberwell: 0.27 ha per 1,000 people
- Canada Water and Rotherhithe: 1.69 ha
- Dulwich: 2.73 ha
- Elephant and Castle: 0.7 ha
- Peckham and Nunhead: 1.93 ha

3.4.59. Public parks are scattered reasonably well around the borough and with the exception of a small area in the north west of the borough and an area in the south, most residents live within a five minute walk of a public park.

3.4.60. A telephone survey carried out with the Open Space Strategy suggested that most people consider the quality of open spaces to be either good or very good, with highest satisfaction levels for allotments (92%), large open spaces (86%) and the Thames Path (88%).

3.4.61. With a projected population increase of 19% over the next fifteen years, and limited opportunities for the creation of new space, the challenge will be to maintain and improve the existing network of high quality open spaces to ensure that those that live and work in the borough experience the wide range of positive benefits associated with health and well-being, quality of life and cohesive communities that open space provides.

## **Play facilities**

- 3.4.62. Open space provides an important role in serving children's play needs. It is widely acknowledged that the importance of children's play extends far beyond the activity itself. Play contributes towards child development through the development of a wide range of physical, social and emotional skills and abilities as well as having a positive impact on children's health.
- 3.4.63. The telephone survey carried out with the Open Space Strategy suggested that over 80% of respondents consider the quality of children's play space in the borough to be good or very good. The increase in population expected over the coming years will put pressure on the supply of children's playspace and it will be important to ensure that adequate provision for playspace is made with new developments.

## **Biodiversity**

- 3.4.64. Southwark has many natural greenspaces and sites of importance for nature conservation. As with public parks, levels of greenspace vary in different areas of the borough:
- Aylesbury and Walworth: 2.01 ha per 1,000 people
  - Bankside, Borough and London Bridge: 0.97 ha
  - Bermondsey and Old Kent Road: 0.29 ha
  - Camberwell: 0.42 ha per 1,000 people
  - Canada Water and Rotherhithe: 3.55 ha
  - Dulwich: 3.84 ha
  - Elephant and Castle: 0.31 ha
  - Peckham and Nunhead: 1.67 ha
- 3.4.65. Population increases over the next 15 years will make it important that the network and quality of natural greenspaces is enhanced where possible. Habitat loss is a major concern in the borough, with the constant demand for new homes and other buildings resulting in sites being lost to development. In addition, local wildlife is still under threat.
- 3.4.66. Southwark's Biodiversity Action Plan (2012) aims to provide a comprehensive overview of the biodiversity in Southwark and a clear direction in ensuring it is conserved, managed and enhanced. Birds, stag beetles, bats and amphibians are particularly at risk in Southwark. Many species of plants and animals are protected under European and national laws, including the Habitats Regulations 1994 and The Wildlife and Countryside Act 1981. The action plan is designed to be a valuable toolkit that provides a unified strategic framework for managing the borough's natural resources.

## **Allotments**

- 3.4.67. Our site surveys have shown that about 15.3 ha of land across the borough is used for allotments and a further 2.9 ha is used as community gardens. The vast majority of allotment provision is located in the south of the borough, with 8.5ha located in Dulwich and 5.9ha located in Peckham and Nunhead. By contrast, the majority of community gardens are located in the north of the borough. Canada water and Rotherhithe is the only area with no provision.

3.4.68. The Open Space Strategy identified at least 797 people on the waiting list for allotment spaces in the borough. At most sites, the waiting list is up to 10 years, although there may be a limited number of sites where waiting lists are around 1-2 years.

3.4.69. There is a clear need for additional allotment space to meet unmet demand. However, allotments in their traditional sense represent space for food growing which are essentially restricted to single ownership. To meet the significant levels of unmet demand in the borough there will be a need to identify alternative methods to allotment provision, including shared community gardens.

### **Quality in Design and Conservation of Historic Environment**

3.4.70. Southwark has many places with their own unique character. The north west of the borough is a setting for activity and large scale development including tall buildings which give Southwark and London a distinct skyline. There are fewer and smaller open spaces and fewer trees and gardens, but there is a close relationship with the River Thames. Areas such as London Bridge and Elephant and Castle will be transformed by regeneration programmes and major new development.

3.4.71. Areas in the middle of the borough around Bermondsey, Walworth, Camberwell and Peckham are characterised by lower scale development, with a mixture of Victorian and Edwardian terraces, broken up by post-war estates, town centres and some newer housing development. The southern part of Southwark around Nunhead, Peckham Rye and Dulwich has very leafy and green residential neighbourhoods with large open spaces, gardens and tree-lined streets of houses and terraces rather than flats. Rotherhithe combines larger scale development located around Canada Water, with more suburban forms of development around the periphery of the Rotherhithe peninsula.

3.4.72. Throughout the borough there are many attractive and historic buildings, monuments and sites that reflect Southwark's rich history and add to the unique character and identity of places. We currently have 45 conservation areas and around 2,500 listed buildings and monuments. The Tower of London, a World Heritage Site, is located across the river from London Bridge. There are also archaeological remains that cannot be seen that provide important evidence of our past. We have identified 9 Archaeological Priority Zones (APZs) covering 679ha (23% of the borough).

3.4.73. Protecting and enhancing the character and historic value of places are important issues to be considered in the future growth and regeneration of the borough. Well designed buildings and spaces will help improve people's quality of life and make places more attractive. This can also help attract businesses to the area. It is important that the design of a development is carefully thought through and takes into account how the development is part of a wider place and how a place's uniqueness and historic value can be used to stimulate regeneration and improvements.

## Transport

3.4.74. In 2011 Southwark adopted its Transport Plan. The most recent monitoring of the transport plan in 2012/13 shows that around 582,000 trips are made every day in the borough. Of people living in the borough, the main method of transport is walking. The mode share of trips for Southwark residents is:

- Rail – 8%
- Underground/DLR – 8%
- Bus/tram – 24%
- Taxi/other public – 1%
- Car/motorcycle – 23%
- Cycle – 4%
- Walking – 30%

3.4.75. Since 2006 private motor vehicle trips have been decreasing as a percentage of the total trips and the percentage of trips on rail and the underground/DLR has increased. Percentage trips on foot and by bus have remained fairly stable. Cycling levels in the borough have increased from 3.3% (2008/11 average) to 4.3% (2009/12 average) which equates to an additional 10,200 trips by bike per day.

3.4.76. The number of casualties in which people are killed or seriously injured (KSI) appears to be decreasing and number of slight and all casualties has been stationary in recent years. Casualties are higher than the inner and greater London borough averages. The number of cyclist casualties is increasing in line with the growth in cycling.

3.4.77. The objectives of the Southwark Transport Plan include encouraging sustainable travel choices and promoting active lifestyles, increasing the share of walking and cycling trips, reducing the number of casualties and reducing CO2 emissions from road transport. With an increasing population and workforce in Southwark, it will be important that development contributes towards shaping sustainable travel choices, reducing pollution and improving safety in the future.

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- <sup>58</sup> Land for Industry and Transport SPG  
<https://www.london.gov.uk/priorities/planning/publications/land-for-industry-and-transport-spg>
- <sup>59</sup> London Development Database
- <sup>60</sup> London Development Database
- <sup>61</sup> Draft Retail Capacity Study 2015
- <sup>62</sup> Draft Retail Capacity Study 2015
- <sup>63</sup> Draft Retail Capacity Study 2015

- <sup>64</sup> Draft Retail Capacity Study 2015
- <sup>65</sup> Draft Retail Capacity Study 2015
- <sup>66</sup> Draft Retail Capacity Study 2015
- <sup>67</sup> Draft Retail Capacity Study 2015
- <sup>68</sup> Draft Retail Capacity Study 2015
- <sup>69</sup> Draft Retail Capacity Study 2015
- <sup>70</sup> Draft Retail Capacity Study 2015
- <sup>71</sup> Draft Retail Capacity Study 2015
- <sup>72</sup> Draft Retail Capacity Study 2015
- <sup>73</sup> Draft Retail Capacity Study 2015
- <sup>74</sup> Draft Retail Capacity Study 2015
- <sup>75</sup> London Development Database
- <sup>76</sup> Understanding the Demand for and Supply of Visitor Accommodation in London to 2036, Greater London Authority <https://www.london.gov.uk/priorities/business-economy/publications/gla-economics/understanding-the-demand-for-and-supply-of-visitor-accommodation>
- <sup>77</sup> Hotel Demand Study, Greater London Authority <http://legacy.london.gov.uk/mayor/planning/docs/hotel-demand-study.pdf>
- <sup>78</sup> London Development Database
- <sup>79</sup> Understanding the Demand for and Supply of Visitor Accommodation in London to 2036, Greater London Authority <https://www.london.gov.uk/priorities/business-economy/publications/gla-economics/understanding-the-demand-for-and-supply-of-visitor-accommodation>
- <sup>80</sup> London Development Database
- <sup>81</sup> London Development Database
- <sup>82</sup> Southwark Air Quality Strategy and Action Plan 2012
- <sup>83</sup> Southwark Air Quality Strategy and Action Plan 2012
- <sup>84</sup> Southwark Air Quality Strategy and Action Plan 2012
- <sup>85</sup> Southwark Air Quality Strategy and Action Plan 2012
- <sup>86</sup> Southwark Air Quality Strategy and Action Plan 2012
- <sup>87</sup> Southwark Transport Plan 2011

## 4. SUSTAINABILITY, HEALTH AND EQUALITY ISSUES AND OBJECTIVES

### 4.1. Key issues

- 4.1.1. Table 6 identifies key sustainability issues that have been identified for Southwark which the New Southwark Plan and the IIA should aim to address. These have been identified through monitoring, engagement with stakeholders, a review of relevant policies, strategies and programmes and existing council evidence base documents, and a survey of baseline data and information about the borough.
- 4.1.2. The sustainability issues are set out in the context of a number of themes, in recognition of the over-arching status of the spatial plan and the likely format of the emerging NSP. Setting the sustainability issues out in this context will also enable the IIA to be consistent with the Sustainability Appraisal and other impact assessments prepared for the NSP.
- 4.1.3. The final NSP will include spatial policy (including allocation of sites) and detailed policies for the purposes of development management. As the document advances, further and more detailed sustainability issues will be identified; as such, the IIA accompanying the Preferred Options and Proposed Submission version of the NSP will include assessment of policies that seek to address sustainability issues that may not have been identified at this stage, or emerge during the plan-making period.

<b>Table 4.1 : Key environmental, health and equality issues</b>	
<b>Revitalised Neighbourhoods</b>	
	<ul style="list-style-type: none"> <li>• Relatively high levels of deprivation</li> <li>• Access to services and health inequalities</li> <li>• Limited access to healthy food linked to obesity and related diseases</li> <li>• Mental illness and poor self-esteem associated with unemployment and poverty</li> <li>• High levels of crime and fear of crime</li> <li>• Growing population</li> <li>• Poor environment leading to physical inactivity</li> <li>• Improving the health of Southwark residents by promoting healthy lifestyles.</li> <li>• Maintaining local distinctiveness and protecting and enhancing place-making assets.</li> </ul>
<b>Homes</b>	
	<ul style="list-style-type: none"> <li>• Providing everyone with a decent and affordable home to live in to meet housing needs of present and future generations</li> <li>• Providing and maintaining suitable accommodation for those with specialist need, vulnerable individuals and families.</li> <li>• Lack of living space - overcrowding</li> <li>• Improving existing housing stock and delivering new council housing</li> <li>• Providing the right mix and balance of housing types, sizes and tenures in areas of the borough</li> <li>• Optimising the efficient use of land at appropriate densities.</li> <li>• Delivery of the London Plan housing target</li> </ul>

<b>Travel</b>
<ul style="list-style-type: none"> <li>• Improving the transport network and infrastructure</li> <li>• Providing and maintaining sustainable transport choices for all members of the community</li> <li>• Reducing congestion and pollution</li> <li>• Managing delivery and servicing activities</li> <li>• Improving accessibility by public transport</li> </ul>
<b>Business, Employment and Enterprise</b>
<ul style="list-style-type: none"> <li>• Addressing employment inequalities and reducing the barriers to employment</li> <li>• Increasing employment opportunities through training to increase skills</li> <li>• Maintaining concentrations of employment floorspace in key accessible locations</li> <li>• Improving land use efficiency through managed release of surplus employment land.</li> <li>• Providing space for businesses of all sizes to establish and grow.</li> <li>• Protecting space for small and medium sized enterprises</li> <li>• Improving the educational attainment, skills and aspirations of residents</li> </ul>
<b>Town Centres</b>
<ul style="list-style-type: none"> <li>• Increasing the vitality and viability of town and local centres</li> <li>• Improving retail choice and the balance of retail and other town centre uses</li> <li>• Supporting local people to make healthier choices</li> <li>• Attracting and facilitating town centre investment</li> <li>• Protecting essential shopping services for local communities</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• The creation of healthy, cohesive, inclusive and safe environments</li> <li>• Providing adequate community facilities and infrastructure to meet the needs of a growing population and facilitate social interaction</li> <li>• Identifying appropriate locations for community facilities</li> </ul>
<b>Design, Heritage and Environment</b>
<ul style="list-style-type: none"> <li>• Ensuring a high quality of design in new developments to ensure accessibility, inclusivity and interaction</li> <li>• Protecting and enhancing biodiversity and access to the natural environment</li> <li>• Mental health benefits from access to nature, biodiversity, green space and water</li> <li>• Address existing open space deficiencies and improving the use of open spaces for sport, leisure and environment purposes</li> <li>• Increasing green links and improving the public realm</li> <li>• Need to preserve and enhance the historic environment and built heritage</li> <li>• Protection of landscape features and designated sites</li> <li>• Sensitivities around very tall buildings</li> </ul>
<b>Sustainability</b>
<ul style="list-style-type: none"> <li>• Mitigating and adapting to climate change</li> <li>• Minimising flood risk and improving resilience to flood risk.</li> <li>• Improving recycling and the management of waste.</li> <li>• Improving energy efficiency and use of renewables</li> <li>• Providing opportunities for heat and power networks.</li> </ul>

- Improving air quality and decreasing level of emissions from industry, residential, construction and traffic.
- Need for sustainable use of water resources
- Need to ensure that there is social, physical and green infrastructure capacity for existing and future needs
- Reducing the impact of noise
- Ensuring high standards of sustainable design are achieved in the built environment.
- Health risks from toxicity of contaminated land
- Opportunities for food growing – active lifestyles, healthy diet and tackling food poverty

## 4.2. Integrated Impact Assessment objectives

- 4.2.1. The likely impacts of the NSP will be identified using a set of objectives, which relate to the existing and emerging strategic vision for the borough. The objectives reflect the current social, economic and environmental issues affecting the borough and are linked with the aims of Southwark 2016 (Community Strategy).
- 4.2.2. The Integrated Impact Assessment (IIA) objectives set out below were presented in the original Scoping Report for the Core Strategy. It is proposed that these objectives will be used in the IIA unless any further alterations are recommended during the consultation process.
- 4.2.3. The 17 objectives set out below in table 4.2 reflect the move towards integration of impact assessments for the NSP; objectives and associated criteria questions can be linked to Habitats Regulations Assessment, the Equalities Analysis, and Health Impact Assessment.
- 4.2.4. Each of the objectives has been linked to the monitoring framework set out for the Core Strategy, which established a comprehensive set of indicators to be examined through the Authority Monitoring Report. Making use of the same indicators for the NSP IIA allows for a consistency across the Local Plan process and ensures the objectives established below can be assessed.
- 4.2.5. As the NSP is progressed, the IIA will appraise policy options and site allocations against these objectives. The framework of objectives is set out in table 5.2. For the purposes of the framework, each decision appraised will be *either* the formation of strategic and development management policies within the NSP, *or* the allocation of sites to a particular land-use or for other forms of spatial protection.

**Table 4.2 :Integrated Impact Assessment Objectives**

IIAO 1	To tackle poverty and encourage wealth creation
IIAO 2	To improve the education and skill of the population
IIAO 3	To improve the health of the population
IIAO 4	To reduce the incidence of crime and the fear of crime
IIAO 5	To promote social inclusion, equality, diversity and community cohesion
IIAO 6	To reduce contributions to climate change
IIAO 7	To improve the air quality in Southwark
IIAO 8	To avoid waste and maximise, reuse or recycle waste arising as a resource
IIAO 9	To encourage sustainable use of water resources
IIAO 10	To maintain and enhance the quality of land and soils
IIAO 11	To protect and enhance quality of landscape and townscape
IIAO 12	To conserve and enhance the historic environment and cultural assets
IIAO 13	To protect and enhance open spaces, green corridors and biodiversity
IIAO 14	To reduce vulnerability to flooding
IIAO 15	To provide everyone with the opportunity to live in a decent home
IIAO 16	To promote sustainable transport and minimise the need to travel by car
IIAO 17	To provide the necessary infrastructure to support existing and future development

## **5. DEVELOPING THE INTEGRATED IMPACT ASSESSMENT FRAMEWORK**

### **5.1. Introduction**

5.1.1. The framework that was developed for the SA for the Core Strategy has been used as the starting point for this IIA and amendments made where considered necessary.

5.1.2. The framework includes objectives that should be achieved by the NSP to make sure that it benefits the environment, economy and the community. This is measured by criteria questions that will be used to test the likely outcomes of the NSP policies.

## 5.2. Integrated Impact Assessment Framework

**IIA Incorporates: Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA); Health Impact Assessment (HIA) and Equality Analysis (EqA).**

TABLE 5.2		
IIA Objective	Potential SA/HIA/EqA sub criteria for assessment	Potential Monitoring Indicators
<p><b>IIAO1:</b>  <b>To tackle poverty and encourage wealth creation</b></p>	<p>Will it improve the range of job opportunities for all local people?            Will it help to diversify the economy?            Will it increase the numbers of higher paid jobs in the borough?            Will it help reduce overall unemployment, particularly long-term unemployment?            Will it encourage the retention and /or growth of local employment and training opportunities in the most deprived areas?            Will it assist in providing land and buildings of a type required by businesses, for a range of employment uses?            Will it reduce poverty in those areas and communities / equalities groups most affected?            Will it improve access to low-cost transport and other facilities?            Will it provide for successful neighbourhoods for all?            Will it promote and enable tourism opportunities to be exploited, and employment created?            Will it result in a loss of employment land?</p>	<p>Employment land available and take up rates</p> <p>New business formation and Survival            a) Rate of Business Formation per 10,000            b) 3 year business survival rate</p> <p>Numbers and % jobs in Southwark by sector</p> <p>Southwark compared to London (broken down by micro, small and medium sized businesses)</p> <p>Vacancy Levels and non-retail uses in primary frontages in town centres</p> <p>Numbers of unemployed/ numbers receiving benefit (by sector)</p> <p>Indices of deprivation 2015: Local Authority summary</p> <p>Indices of deprivation 2015: Employment domain</p> <p>Indices of deprivation 2015: Income domain</p> <p>Children in poverty (under 16s)</p>
<p><b>IIAO2:</b></p>	<p>Will it provide opportunities to improve the skills and qualifications</p>	<p>Indices of deprivation 2015: Local Authority summary</p>

TABLE 5.2		
IIA Objective	Potential SA//HIA/EqA sub criteria for assessment	Potential Monitoring Indicators
<b>To improve the education and skill of the population</b>	<p>of the population, particularly for young people and adults?            Will it help improve employee education/training programmes?            Will it help reduce skills shortages?            Will it help to reduce the disparity in educational achievement between different ethnic groups?</p>	<p>Indices of deprivation 2015: Education, skills and training domain</p> <p>Indices of deprivation 2015:</p> <p>% of the population with higher education qualifications</p> <p>% of population with no qualifications</p> <p>Proportion of resident pupils attending Southwark schools achieving 5+ A-Cs including English and Maths</p>
<b>IIAO3: To improve the health of the population</b>	<p>Will it promote and facilitate healthy living and active lifestyles amongst different groups?            Will it improve access to health and social care/treatment for all sectors of the community?            Will it maintain, enhance and create green infrastructure assets (e.g. green space, woodlands, recreation and sports facilities and allotments) for recreation, exercise and access to locally produced food.            Will it improve the quality of housing for all?            Will it improve access to jobs for all and otherwise reduce poverty?            Will it encourage a range and mix of land uses that underpin local health; for example, avoiding over concentration of hot food takeaways in one location?            Will it help facilitate the supply and availability of locally produced food?            Will it help improve mental and emotional health, reducing social exclusion?            Will it promote non-polluting forms of transport?            Will it reduce exposure to poor air quality across all groups?</p>	<p>Life expectancy by equality group</p> <p>Rate of obesity in children (year 6)</p> <p>Obese adults</p> <p>Infant mortality</p> <p>Mortality from cancer, heart disease and stroke</p> <p>Smoking related deaths</p> <p>Alcohol specific hospital stays (under 18s)</p> <p>Hospital stays for alcohol related harm</p> <p>Drug misuse</p> <p>Incapacity benefit for mental illness</p> <p>Distance to GP premises from home</p>

TABLE 5.2		
IIA Objective	Potential SA//HIA/EqA sub criteria for assessment	Potential Monitoring Indicators
		<p>Percentage of hospital admissions that were emergencies, by ethnic group</p> <p>Indices of deprivation 2015: health deprivation and disability</p> <p>Indices of deprivation 2015: barriers to housing and services domain</p> <p>Indices of deprivation 2015: living environment domain</p> <p>No. of new takeaways permitted</p>
<p><b>IIAO4:</b>  <b>To reduce the incidence of crime and the fear of crime</b></p>	<p>Will it improve safety and security?</p> <p>Will it incorporate measures to reduce crime and the fear of crime, including anti-social behaviour?</p> <p>Will it provide for a well maintained and inclusive public realm and other public facilities?</p> <p>Will it encourage an active and connected, strong and cohesive community?</p>	<p>Indices of deprivation 2015: Crime deprivation</p> <p>Numbers of types of crime per annum</p> <p>Percentage of residents who feel fairly safe or very safe outside during the day/night</p> <p>Reports of anti-social behaviour</p>
<p><b>IIAO5:</b>  <b>To promote social inclusion, equality, diversity and community cohesion</b></p>	<p>Will it help support the voluntary and community sectors?</p> <p>Will it support active community engagement?</p> <p>Will it support a diversity of lifestyles and communities?</p> <p>Will it promote accessibility for those people who are elderly or disabled?</p> <p>Will it improve access to low-cost transport and other facilities?</p> <p>Will it help to sustain the provision of community facilities and open space that meets local needs?</p> <p>Will it facilitate connection of existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?</p>	<p>Proportion of people who think they can influence decision-making in their locality</p> <p>Employment/Skills/Health/</p> <p>Homelessness waiting list by equality group</p>

<b>TABLE 5.2</b>		
<b>IIA Objective</b>	<b>Potential SA//HIA/EqA sub criteria for assessment</b>	<b>Potential Monitoring Indicators</b>
	How will different groups of people be affected by the option or policy - including black and minority ethnic communities, women, disabled people, lesbians, gay men, bisexual and transgender people, older people, young people, children and faith groups? Will it benefit the groups listed above?	
<b>IIAO6: To reduce contributions to climate change</b>	<p>Will it reduce CO2 and other greenhouse gas emissions?</p> <p>Will it reduce consumption of energy?</p> <p>Will it use renewable sources of energy?</p> <p>Will it help local people cope with hotter drier summers and warmer wetter winters?</p> <p>Will it mitigate against the urban heat island effect?</p> <p>Will it encourage the re-use of resources?</p> <p>Will it encourage water efficiency and drought resilience?</p> <p>Will it encourage the reuse or improvement of buildings and land that are vacant, under utilised or in disrepair?</p> <p>Will it maintain or enhance biodiversity?</p>	<p>BREAAM and Code for Sustainable Homes Scores of major consents</p> <p>CO2 emissions and energy consumption (break down by source/type)</p> <p>No. of extreme weather events by type</p> <p>No. of hospital admissions as a result of extreme weather</p> <p>Environmental performance of borough's housing stock</p>
<b>IIAO7: To improve the air quality in Southwark</b>	<p>Will it improve air quality?</p> <p>Will it help to reduce emissions of PM10, NO2?</p> <p>Will it minimise construction impacts such as dust, noise, vibration and odours?</p> <p>Will it encourage a reduction in amount and length of journeys made by car?</p>	<p>Number of days of high air pollution</p> <p>Annual average concentrations and number of hourly exceedences of nitrogen dioxide in air</p> <p>Annual average concentrations and number of daily exceedences of PM10 in air</p>

TABLE 5.2		
IIA Objective	Potential SA/HIA/EqA sub criteria for assessment	Potential Monitoring Indicators
<b>IIAO8: To avoid waste and maximise, reuse or recycle waste arising as a resource</b>	Will it promote the reduction of waste during construction / operation? Will it minimise the production of household and commercial waste? Will it promote sustainable processing of waste?	Municipal waste land-filled (tonnes) Residual household waste per household (tonnes) Percentage of municipal waste sent for reuse, recycling and composting
<b>IIAO9: To encourage sustainable use of water resources</b>	Will it result in a net increase in the demand for water, and foul sewage disposal? Will it encourage reuse of water? Will it maximise use of rainwater or other local water supplies? Will it reduce discharges to surface and groundwater?	Average domestic and commercial potable water consumption (l/head/day) Water quality measure
<b>IIAO10: To maintain and enhance the quality of land and soils</b>	Will it result in the loss of open or previously undeveloped land? Will it promote re-use of previously developed land and buildings? Will it use land effectively and efficiently, including mixed use and higher density development? Will it encourage the remediation of land identified as potentially contaminated? Will it prevent further contamination of soils? Will it improve soil quality?	New homes built on previously developed land Number of contaminated sites Number of contaminated sites not remediated
<b>IIAO11: To protect and enhance quality of landscape and townscape</b>	Will it conserve and enhance local landscape and townscape character, and visual amenity? Will it improve the relationship between different buildings, streets, squares, parks and waterways and other spaces that make up the townscape character? Will it have a negative impact on important strategic/local views? Will it incorporate sustainable design and construction techniques?	Building for Life Assessments Housing density BREAAAM and Code for Sustainable Homes Scores of major consents
<b>IIAO12:</b>	Will it protect, maintain and enhance the condition and setting of	Amount of Southwark covered by Conservation Area or APZ

TABLE 5.2		
IIA Objective	Potential SA//HIA/EqA sub criteria for assessment	Potential Monitoring Indicators
<b>To conserve and enhance the historic environment and cultural assets</b>	<p>features and areas of cultural, historical and archaeological heritage in the environment?</p> <p>Will it promote the historic environment and also contribute to better understanding of the historic environment?</p> <p>Will it promote high quality design and sustainable construction methods?</p> <p>Will it respect visual amenity and the spatial diversity of communities?</p> <p>Will it maintain or increase access to leisure, sporting, cultural and arts destinations and facilities?</p> <p>Will it improve leisure, sporting, cultural and arts provision?</p>	<p>Numbers of heritage assets in the borough on the English Heritage buildings at Risk Register</p> <p>Changes in numbers of listed buildings</p> <p>Number of scheduled ancient monuments at risk</p> <p>Number of conservation areas at risk</p> <p>Number of conservation areas with up-to-date appraisal/management plans</p>
<b>IIAO13: To protect and improve open spaces, green corridors and biodiversity</b>	<p>Will it encourage development on previously developed land?</p> <p>Will it improve the quality and access to open spaces in areas of deficiency?</p> <p>Will it provide a range of play spaces for children and young people?</p> <p>Will it maintain, enhance and create green infrastructure assets and networks (e.g. green space, woodlands, public rights of way, open recreation and sports facilities) across the area?</p> <p>Will it help protect and improve biodiversity in the area overall and in particular avoid harm to species and habitats protected by International and UK law?</p> <p>Will it protect and enhance natural habitats and protect priority species?</p> <p>Will it encourage the creation of new habitats, including through the provision of additional open space and green roofs?</p> <p>Will it help achieve the Biodiversity Action Plan (BAP) targets?</p> <p>Will it protect and provide opportunities for creating/enhancing/improving sites designated for their nature conservation value/geodiversity level (local and national levels?)</p>	<p>Change in quantity of open space (ha)</p> <p>Change in SINCS and LNPS</p> <p>Number and net change in natural/semi-natural habitats</p> <p>Changes in population of selected characteristic species</p> <p>Open space deficiency</p> <p>Deficiency in access to nature</p> <p>Protected trees lost</p> <p>No. of green roofs/facades</p>

TABLE 5.2		
IIA Objective	Potential SA/HIA/EqA sub criteria for assessment	Potential Monitoring Indicators
<b>IIAO14: To reduce vulnerability to flooding</b>	<p>Will the development be in an area at risk of flooding?</p> <p>Will it minimise the risk of and from flooding to people and property?</p> <p>Will it protect and improve flood defences and allow them to be maintained?</p> <p>Will it promote the use of sustainable urban drainage systems?</p>	<p>Planning permissions granted contrary to EA advice</p> <p>Number of flooding incidents (including sewer flooding)</p> <p>Condition of flood defences</p> <p>Flood protection projects delivered as part of consents and otherwise</p>
<b>IIAO15: To provide everyone with the opportunity to live in a decent home</b>	<p>Will it improve the supply of housing?</p> <p>Will it contribute towards increasing the range of housing mix, sizes, tenures and affordability, to meet the identified current and future needs of all social groups and local residents, including older households?</p> <p>Will it deliver 'healthy homes'? (e.g. in relation to warmth, overcrowding, noise and mental health?)</p> <p>Will it improve overall design quality, including flexibility of stock to enable it to evolve to meet changing needs?</p>	<p>Amount of homes in the borough</p> <p>Percentage of households living in temporary accommodation</p> <p>Households in housing need</p> <p>Households on the housing register</p> <p>Households unintentionally homeless and in priority need</p> <p>Income to average house price ratio</p> <p>No. of families living in overcrowded properties</p> <p>Proportion of consents meeting lifetime homes criteria</p>
<b>IIAO16: To promote sustainable transport and minimise the need to travel by car</b>	<p>Will it encourage development at locations that enable walking, cycling and/or the use of public transport and connected to local services and facilities?</p> <p>Will it reduce car use?</p> <p>Will it reduce the number and length of journeys undertaken by car?</p> <p>Will it reduce road traffic accidents?</p>	<p>Estimated traffic flows per annum (mil.vehicle km)</p> <p>Transport related CO2 emissions</p> <p>The number of people killed or seriously injured in road traffic collisions</p>

<b>TABLE 5.2</b>		
<b>IIA Objective</b>	<b>Potential SA/HIA/EqA sub criteria for assessment</b>	<b>Potential Monitoring Indicators</b>
	<p>Will it improve public transport?            Will it promote walking and cycling?            Will it allow people with mobility problems or a disability to access buildings and places?            Will it improve connections across the area to local services, facilities, places of employment and green infrastructure?</p>	<p>Proportion of personal travel made on each mode of transport overall and by equality group</p>
<p><b>IIAO17:            To provide the necessary infrastructure to support existing and future development</b></p>	<p>Will it provide enough social infrastructure and meet local needs?            Does the proposal explore opportunities for shared community use and co-location of services?            Will it provide enough physical infrastructure?            Will it provide enough green infrastructure?</p>	<p>No. and type of existing infrastructure (social, physical and green)            Capacity of existing infrastructure (social, physical and green)            No. and type of proposed infrastructure (social, physical and green)            Capacity of future infrastructure (social, physical and green)</p>

### 5.3. COMPARISON OF THE IIA OBJECTIVES

5.3.1. As part of the IIA a comparison of the objectives was undertaken to check if the objectives are compatible with one another.

	SDO1	SDO 2	SDO 3	SDO 4	SDO 5	SDO 6	SDO 7	SDO 8	SDO 9	SDO 10	SDO11	SDO12	SDO13	SDO14	SDO15	SDO16
IIAO 2	✓															
IIAO 3	✓	0														
IIAO 4	✓	0	✓													
IIAO 5	✓	✓	✓	✓												
IIAO 6	✓	0	✓	0	0											
IIAO 7	✓	0	✓	0	0	✓										
IIAO 8	✓	0	0	0	0	✓	0									
IIAO 9	✓	0	✓	0	0	✓	0	0								
IIAO 10	✓	0	✓	0	0	0	0	✓	0	0						
IIAO 11	✓	0	0	0	0	?	0	?	0	0	0					
IIAO 12	✓	0	0	0	0	?	0	?	0	0	✓					
IIAO 13	✓	0	✓	0	0	✓	✓	0	✓	✓	✓	✓				
IIAO 14	✓	0	✓	0	0	✓	0	0	✓	0	0	0	✓			
IIAO 15	✓	0	✓	0	✓	✓	✓	0	✓	0	✓	✓	✓	✓		
IIAO 16	✓	✓	✓	0	✓	✓	✓	✓	0	0	✓	0	✓	✓	✓	✓
IIAO 17	✓	0	✓	0	0	✓	✓	0	✓	0	0	0	✓	✓	✓	✓

✓ Compatible  
0 No significant link  
? Depends on implementation

5.3.2. The compatibility of IIAO 6: To reduce contributions to climate change and IIAO 8: Waste Management with IIAO11: Quality in Design and IIAO12 Conservation of the Historic Environment will depend upon implementation. Careful application of renewable technologies and waste provision will be needed to ensure that quality in design or the setting of historic environment is not compromised.

## 5.4. Method of Assessment

- 5.4.1. This section explains the proposed approach and methods for the IIA of the NSP.
- 5.4.2. The IA Framework presented in Table 7 will form the basis for appraising reasonable options for policies and for site allocations. The table sets out the criteria that will be used to determine the nature and significance of effects against IIA Objectives, including any assumptions or uncertainties that will be made. This ensures a consistent approach is taken for the appraisal of all reasonable options.
- 5.4.3. The Sustainability Appraisal (SA) for the Core Strategy used a system of symbols to represent the findings of the SA for different elements of the emerging plan. The IIA of options will adopt the same system of symbols to represent the findings.

**Table 6.2**

<b>Key</b>	✓✓	Major positive
	✓	Minor positive
	xx	Major negative
	x	Minor Negative
	?	Uncertain
	-	No significant Impact

- 5.4.4. The IIA will be structured under topic headings, which have been linked to Objectives in the IA Framework as well as topics in the SEA Directive. This will provide a framework and structure to evaluate the likely significant effects of the NSP policies against these key topics, which will include health and equality. The site allocation options will be grouped together by geographical clusters to ensure that a comparative appraisal of alternatives is carried out. This will also help to ensure that appropriate consideration is given to the potential cumulative effects of site options on areas of the borough.
- 5.4.5. The appraisal will be undertaken using professional judgment, supported by the baseline information and wider evidence base. A summary appraisal commentary will be provided to set out any significant effects identified for individual options, along with suggestions for mitigation or enhancement to be made where relevant. The nature of the likely effects (including positive/negative, duration, permanent/ temporary, secondary, cumulative and synergistic) will be described, along with any assumptions or uncertainties noted. Where necessary, the appraisal commentary will also identify any potential cumulative effects for that option.
- 5.4.6. IIA is an assessment tool that helps to inform decision-making, it is not the sole basis for a decision. The Council will consider the findings of the IIA alongside the wider evidence base to inform the development of policy as well as help to determine which of the reasonable options should be progressed through the NSP. The IIA Report will clearly set out the reasons for the selection or rejection of options in plan-making.

## **5.5. HEALTH IMPACT ASSESSMENT**

5.5.1. For the HIA element of the IIA the impacts on the population groups listed below will be considered:

Black and minority ethnic people (incl. gypsy/travellers)
Children and young people
Women
Men
Older people
Disabled people
People with learning difficulties
People with long term illness
People in religious/faith groups
Lesbian, gay, bisexual and transgender people
Communities in areas of disadvantage
People with low income
People who are unemployed
People with mental health problems
People with alcohol and other drug problems
Homeless/street community
Refugees and asylum seekers
People involved in criminal justice system
People who experienced domestic violence
Carers
Residents
Workers
Migrant workers
Visitors

## **5.6. EQUALITIES ANALYSIS**

5.6.1. For the EqA element of the IIA the impacts on the protected characteristics listed below in table 5.5 will be considered.

5.6.2. The Equality Act was introduced in October 2010. It replaces and extends all previous equality legislation into one overarching act. The Equality Act 2010 outlines a number of “protected characteristics”, which are the groups of people or communities where the government feels that discrimination or unfair treatment could arise. The IIA will consider if there are any unintended consequences for some groups and if the policies will be fully effective for all target groups.

<b>Table 5.5</b>	
<b>Age</b>	A person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18-30 year olds).
<b>Disability</b>	A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
<b>Gender reassignment</b>	The process of transitioning from one gender to another.
<b>Marriage and civil partnership</b>	Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.
<b>Pregnancy and maternity</b>	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
<b>Race</b>	A group of people defined by their race, colour and nationality (including citizenship) ethnic or national origins.
<b>Religion and belief</b>	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.
<b>Sex</b>	A man or a woman.
<b>Sexual orientation</b>	Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Definitions are from the Equalities and Human Rights Commission

### **Southwark Council's approach to equality: delivering a fairer future for all (2011)**

5.6.3. This report sets out the overarching equality objectives which are linked to the strategic priorities of the council. The objectives below will be considered in the IIA and are set out below:

- Improve the quality of life for Southwark's people through better access to services and creating sustainable mixed communities with opportunities for local people that come from being in the heart of London.
- Improve social cohesion by promoting positive relationships and a sense of community and belonging, by reducing fear and tensions, and encouraging civic responsibility so that the contributions individuals and groups make to their communities are properly valued.
- Promote people's rights and responsibilities. We will do this by ensuring that the council does all it should in providing leadership and by encouraging its partners to do likewise. We will act to protect the rights of those who live in Southwark by ensuring that abuse; mistreatment or discrimination is identified and dealt with.
- Ensuring we have a workforce that understands and is committed to achieving these goals and retains the confidence of our local communities.

## 5.7. HABITATS REGULATIONS ASSESSMENT

- 5.7.1. The Conservation of Habitats and Species Regulations (as amended) (2010) [the Habitats Regulations] require that HRA is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance.
- 5.7.2. The objective of the HRA screening process is to determine whether likely significant effects on designated Natura 2000 sites, either alone or in combination may result from the implementation of the NSP. 'Likely significant effect' in this context is any effect that may reasonably be predicted as a consequence of the plans that may affect the conservation objectives of the features for which a site was designated.
- 5.7.3. The information collated in the baseline information and from consultation on the scoping report will be mapped, reviewed and assessed against the draft policies and strategies of the NSP to determine whether there is potential for the integrity of these sites to be affected. Site integrity is defined as:  
*"the coherence of its structure and function across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified"*
- 5.7.4. The HRA of the NSP will be undertaken alongside the IIA with the findings of the HRA informing the IIA. The methods and findings of the HRA process will be reported separately from the IIA and will be sent to the statutory consultee (Natural England) and placed on consultation for the wider public.

## 6. REPORTING AND NEXT STEPS

### 6.1. Evaluating the likely significant effects of the New Southwark Plan

6.1.1. This scoping report and its consultation fulfil the requirements as outlined within the Quality Assurance Checklist presented in Appendix 2. The proposed approach and framework of objectives provides a tool to be consistently applied in the assessment of the NSP as it is prepared.

6.1.2. The structure of the IIA Report which will be prepared alongside the Preferred Options NSP will accord with the structure set out in Government guidance as detailed in table 6.1 below:

<b>Table 6.1</b>	
<b>Structure of Report</b>	<b>Information to Include</b>
Non-technical summary	<ul style="list-style-type: none"> <li>• Summary of the process</li> <li>• Summary of the likely significant effects of the plan</li> <li>• Statement on the difference the process has made to date</li> <li>• How to comment on the report</li> </ul>
Methodology used	<ul style="list-style-type: none"> <li>• Approach adopted in the IIA</li> <li>• When was the IIA carried out</li> <li>• Who carried out the IIA</li> <li>• Who was consulted, when and how</li> <li>• Difficulties encountered in compiling information or carrying out the assessment</li> </ul>
Background	<ul style="list-style-type: none"> <li>• Purpose of the IIA report</li> <li>• Objectives of the NSP</li> <li>• Compliance with the SEA Directive, Equality Act 2010 and Planning Regulations</li> </ul>
IIA objectives, baseline and context	<ul style="list-style-type: none"> <li>• Links to other international, national, regional and local plans and programmes, and relevant objectives including how these have been taken into account</li> <li>• Description of baseline characteristics and predicted future baseline</li> <li>• Key issues and problems</li> <li>• Limitations of the data, assumptions made etc.</li> <li>• The IIA framework - objectives and indicators</li> </ul>
Plan options and alternatives	<ul style="list-style-type: none"> <li>• Main strategic alternatives considered and how they were identified</li> <li>• Comparison of the significant sustainability effects of the alternatives</li> <li>• How key issues were considered in choosing the preferred strategic alternatives</li> <li>• Other alternatives considered and why they were rejected</li> <li>• Any proposed mitigation measures</li> </ul>
Plan policy options	<ul style="list-style-type: none"> <li>• Significant sustainability effects of the policies and proposals</li> </ul>

	<ul style="list-style-type: none"> <li>• How sustainability problems were considered in developing the policies and proposals</li> <li>• Proposed mitigation measures</li> <li>• Uncertainties and risks</li> </ul>
Implementation	<ul style="list-style-type: none"> <li>• Links to other tiers of plans and programmes and the project level (environmental impact assessment, design guidance etc.)</li> <li>• Proposals for monitoring</li> </ul>

## 6.2. NEXT STEPS

6.2.1. The next stage will be the generation of preferred options paper for the draft NSP, based on the key issues identified during the scoping stage and the consultation on the New Southwark Plan Issues and Options Paper (October 2014 – March 2015). These preferred options will then be assessed against the IAA framework as set out in Chapter 7. The most sustainable options will form the basis of the draft NSP, which will be assessed in detail through the IIA.

6.2.2. There will be a minimum five week consultation period for this scoping report up until Friday 27 March 2015. Amendments will be made to this report to incorporate stakeholder feedback where appropriate.

### **In responding to this consultation, please consider the following:**

Have the key issues for environment, health and equality been identified?

Is the scope of the Integrated Impact Assessment considered to be adequate?

Are the Integrated Impact Assessment objectives and indicators considered to be appropriate?

Do you have access to any further baseline data or information that should be included within the baseline in Section 3 and Appendix 1?

## APPENDIX 1

### RELEVANT PLANS, STRATEGIES AND PROGRAMMES

#### European

Plan, Strategy or Programme	Summary of objectives and targets
EU Biodiversity Strategy to 2020 (2012)	<p>The European Commission adopted an ambitious new strategy to halt the loss of biodiversity and ecosystem services in the EU by 2020. There are six main targets, and 20 actions to help Europe reach its goal. Biodiversity loss is an enormous challenge in the EU, with around one in four species currently threatened with extinction and 88% of fish stocks over-exploited or significantly depleted.</p> <p>The six targets cover:</p> <ul style="list-style-type: none"> <li>• Full implementation of EU nature legislation to protect biodiversity</li> <li>• Better protection for ecosystems, and more use of green infrastructure</li> <li>• More sustainable agriculture and forestry</li> <li>• Better management of fish stocks</li> <li>• Tighter controls on invasive alien species</li> <li>• A bigger EU contribution to averting global biodiversity loss</li> </ul> <p>The new Biodiversity Strategy follows on from the 2006 Biodiversity Action Plan.</p>
EU Biodiversity Action Plan (2006) and 2010 Assessment	<p>The EU Biodiversity Action Plan addresses the challenge of integrating biodiversity concerns into other policy sectors in a unified way. It specifies a comprehensive plan of priority actions and outlines the responsibility of community institutions and Member States in relation to each. It also contains indicators to monitor progress and a timetable for evaluations. The European Commission has undertaken to provide annual reporting on progress in delivery of the Biodiversity Action Plan. A baseline report was prepared in 2010 to take stock of the 2006 Biodiversity Action Plan and assess the impact it has had on Europe's biodiversity. The report produced by the European Environment Agency, provides the latest facts and figures on the state and trends of different biodiversity and ecosystems components in the EU.</p>
European Landscape Convention (ratified by the UK Government in 2006)	<p>The European Landscape Convention (ELC) is the first international convention to focus specifically on landscape, and is dedicated exclusively to the protection, management and planning of all landscapes in Europe.</p> <p>The ELC was signed by the UK government on 24 February 2006, ratified on the 21 November 2006, and became binding on 1 March 2007.</p> <p>The convention highlights the need to recognise landscape in law, to develop landscape policies dedicated to the protection, management and creation of landscapes, and to establish procedures for the participation of the general public and other stakeholders in the creation and implementation of landscape policies. It also encourages the integration of landscape into all relevant areas of policy, including cultural, economic and social policies</p>
EU Sustainable Development Strategy 2002 (revised 2006) (reviewed 2009)	<p>The overall aim of the EU Sustainable Development Strategy is to identify and develop action to enable the EU to achieve a continuous long-term improvement of quality of life through the creation of sustainable communities able to manage and use resources efficiently, able to tap the ecological and social innovation potential of the economy and in the end able to ensure prosperity, environmental protection and social cohesion</p>
<b>EU Directives</b>	

Plan, Strategy or Programme	Summary of objectives and targets
Air Quality Directive 2008/50/EC	<p>This Directive is on ambient air quality and cleaner air for Europe and includes the following key elements:</p> <ul style="list-style-type: none"> <li>• The merging of most of existing legislation into a single directive (except for the fourth daughter directive) with no change to existing air quality objectives*</li> <li>• New air quality objectives for PM2.5 (fine particles) including the limit value and exposure related objectives – exposure concentration obligation and exposure reduction target</li> <li>• The possibility to discount natural sources of pollution when assessing compliance against limit values</li> <li>• The possibility for time extensions of three years (PM10) or up to five years (NO2, benzene) for complying with limit values, based on conditions and the assessment by the European Commission.</li> </ul> <p>* Framework Directive 96/62/EC, 1-3 daughter Directives 1999/30/EC, 2000/69/EC, 2002/3/EC, and Decision on Exchange of Information 97/101/EC.</p>
Assessment and Management of Environmental Noise (END Directive 2002/49/EC)	<p>The Environmental Noise Directive or END concerns noise from road, rail and air traffic and from industry. It focuses on the impact of such noise on individuals, complementing existing EU legislation which sets standards for noise emissions from specific sources. The Directive requires:</p> <ul style="list-style-type: none"> <li>• the determination of exposure to environmental noise, through noise mapping</li> <li>• provision of information on environmental noise and its effects on the public</li> <li>• adoption of action plans, based upon noise mapping results, which should be designed to manage noise issues and effects, including noise reduction if necessary</li> <li>• preservation by the member states of environmental noise quality where it is good.</li> </ul> <p>The Directive requires mapping and action planning in relation to noise from major roads, major railways, major airports and in agglomerations (large urban areas).</p>
Conservation on Natural Habitats and of Wild Fauna and Flora (Directive 92/43/EEC)	<p>The main aim of this Directive is to promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements. While the Directive makes a contribution to the general objective of sustainable development; it ensures the conservation of a wide range of rare, threatened or endemic species, including around 450 animals and 500 plants. Some 200 rare and characteristic habitat types are also targeted for conservation in their own right</p>
Conservation of Wild Birds Directive 2009/147/EC	<p>This Directive ensures far-reaching protection for all of Europe's wild birds, identifying 194 species and sub-species among them as particularly threatened and in need of special conservation measures.</p>
Energy Performance of Buildings (EU Directive 2002/91/EC)	<p>The objective of this Directive is to promote the improvement of the energy performance of buildings within the Community, taking into account outdoor climatic and local conditions, as well as indoor climate requirements and cost effectiveness considering;</p> <p>This Directive lays down requirements as regards :</p> <ol style="list-style-type: none"> <li>(a) the general framework for the energy performance of buildings;</li> <li>(b) the application of minimum requirements on the energy performance of new buildings;</li> <li>(c) the application of minimum requirements on the energy performance of large existing buildings that are subject to major renovation;</li> <li>(d) energy certification of buildings; and</li> <li>(e) regular inspection of boilers and of air-conditioning systems in buildings and in addition an assessment of the heating installations in which boilers are more than 15 years old.</li> </ol>
Environmental Impact Assessment (EIA) Directive (2014/52/EU)	<p>The newly amended Environmental Impact Assessment (EIA) Directive (2014/52/EU) entered into force on 15 May 2014 to simplify the rules for assessing the potential effects of projects on the environment. It is in line with the drive for smarter regulation, so it reduces the administrative burden. It also improves the level of environmental protection, with a view to making business decisions on public and private investments more sound, more predictable and sustainable in the longer term.</p> <p>It applies to a wide range of defined public and private projects, which are defined in Annexes I and II. All projects listed in Annex I are</p>

Plan, Strategy or Programme	Summary of objectives and targets
	considered as having significant effects on the environment and require an EIA. For projects listed in Annex II, the national authorities have to decide whether an EIA is needed. This is done by the "screening procedure", which determines the effects of projects on the basis of thresholds/criteria or a case by case examination.
Floods Directive (EU Directive 2007/60/EC)	This Directive requires Member States to assess if all water course and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this flood risk. This Directive also reinforces the rights of the public to access this information and to have a say in the planning process.
Groundwater Directive (EU Directive)	This Directive establishes specific measures as provided for in Article 17(1) and (2) of Directive 2000/60/EC in order to prevent and control groundwater pollution. These measures include in particular: (a) criteria for the assessment of good groundwater chemical status; and (b) criteria for the identification and reversal of significant and sustained upward trends and for the definition of starting points for trend reversals. This Directive also complements the provisions preventing or limiting inputs of pollutants into groundwater already contained in Directive 2000/60/EC, and aims to prevent the deterioration of the status of all bodies of groundwater.
Landfill Directive 1999/31/EC	The objective of the Directive is to prevent or reduce as far as possible negative effects on the environment from the landfilling of waste, by introducing stringent technical requirements for waste and landfills. The Directive is intended to prevent or reduce the adverse effects of the landfill of waste on the environment, in particular on surface water, groundwater, soil, air and human health.
Promotion of the use of Biofuels or other Renewable Fuels for Transport (EU Directive 2003/30/EC)	Objective to promote the use of bio-fuels or other renewable fuels to replace diesel or petrol for transport purposes in each Member State, with a view to contributing to objectives such as meeting climate change commitments, environmentally friendly security of supply and promoting renewable energy sources
Renewable Energy (EU Directive 2009/28/EC)	The Directive on renewable energy sets ambitious targets for all Member States, such that the EU will reach a 20% share of energy from renewable sources by 2020 and a 10% share of energy specifically in the transport sector. It also improves the legal framework for promoting renewable electricity, requires national action plans that establish pathways for the development of renewable energy sources including bio-energy, creates cooperation mechanisms to help achieve the targets cost effectively and establishes the sustainability criteria for bio-fuels.
Strategic Environmental Assessment (SEA Directive 2001/42/EC)	Requires the formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. An SEA is mandatory for plans/programmes which are: <ul style="list-style-type: none"> <li>• are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste/ water management, telecommunications, tourism, town &amp; country planning or land use <u>and</u> which set the framework for future development consent of projects listed in the EIA Directive, or</li> <li>• have been determined to require an assessment under the Habitats Directive.</li> </ul>
Urban Waste Water Directive (91/271/EEC)	The Council Directive 91/271/EEC concerning urban waste-water treatment was adopted on 21 May 1991. Its objective is to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors (see Annex III of the Directive) and concerns the collection, treatment and discharge of Domestic waste water, Mixture of waste water and Waste water from certain industrial sectors (see Annex III of the Directive)
Waste Framework Directive 2008/98/EC	To set up a system for the co-ordinated management of waste within the European Community in order to limit waste production. Member states must promote the prevention, recycling and conversion of wastes with a view to their reuse.
Water Framework Directive (EU Directive 2000/60/EC)	The purpose of this Directive is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater. All inland and coastal waters to reach good ecological status by 2015. Indicates the importance of applying and

Plan, Strategy or Programme	Summary of objectives and targets
Industrial Emissions Directive (Directive 2010/75/EU)	developing SUDS policy. This directive commits European Union member states to control and reduce the impact of industrial emissions on the environment.

## National

Plan, Strategy or Programme	Summary of objectives and targets
<b>Legislation</b>	
Air Quality Standards Regulations (2010)	These regulations transpose into English law the requirements of Directives 2008/50/EC and 2004/107/EC on ambient air quality
Building Regulations: England and Wales (Part L1A – Conservation of Fuel and Power, 2010 and 2013) and (Part G Sanitation, hot water safety and water efficiency, 2010)	<p>Part L – Conservation of fuel and power The legal framework and Approved Documents for Part L (Conservation of fuel and power) were last revised by amendments that came into effect in 2013 and 2014. DCLG has published:</p> <ul style="list-style-type: none"> <li>• new 2013 editions of Approved Documents L1A and L2A</li> <li>• further amendments to the 2010 editions of Approved Documents L1B and L2B</li> </ul> <p>Part G (Sanitation, hot water safety and water efficiency) This section covers the technical guidance contained in Part G (Approved Document G) of schedule 1 of the Building Regulations. It covers the requirements with respect to Sanitation, hot water safety and water efficiency.</p>
Climate Change Act (2008)	<p>The Climate Change Act creates a new approach to managing and responding to climate change in the UK, by:</p> <ul style="list-style-type: none"> <li>• setting ambitious, legally binding targets</li> <li>• raking powers to help meet those targets</li> <li>• strengthening the institutional framework</li> <li>• enhancing the UK’s ability to adapt to the impact of climate change</li> <li>• establishing clear and regular accountability to the UK Parliament and to the devolved legislatures</li> </ul>
Community Infrastructure Levy Regulations (2010) (as amended)	The Community Infrastructure Levy (the levy) came into force in April 2010. It allows local authorities in England and Wales to raise funds from developers undertaking new building projects in their area. The money can be used to fund a wide range of infrastructure that is needed as a result of development. This includes new or safer road schemes, flood defences, schools, hospitals and other health and social care facilities, park improvements, green spaces and leisure centres.
Energy Act 2011	<p>The Energy Act provides for some of the key elements of the Coalition’s Programme for Government and its first Annual Energy Statement. It is a first step in our legislative programme, and further legislation has been sought to implement, for example, the findings of the Electricity Market Reform Programme.</p> <p>The Act provides for a step change in the provision of energy efficiency measures to homes and businesses, and makes improvements to our framework to enable and secure low-carbon energy supplies and fair competition in the energy markets.</p>
Environmental Assessment of Plans and Programmes regulations 2004	Provides the regulations for the implementation of the Strategic Environmental Assessment Directive (EU/2001/42/EC) for certain plans and programmes that are likely to have significant environmental impacts
Environmental Noise (England) Regulations 2006 (as amended)	The regulations transpose the EU Directive 2002/49/EC that relates to the assessment and management of environmental noise.

Plan, Strategy or Programme	Summary of objectives and targets
Growth and Infrastructure Act 2013	An Act to make provision in connection with facilitating or controlling the following, namely, the provision or use of infrastructure, the carrying-out of development, and the compulsory acquisition of land; to make provision about when rating lists are to be compiled; to make provision about the rights of employees of companies who agree to be employee shareholders; and for connected purposes
<b>Human Rights Act 1998</b>	An Act to give further effect to rights and freedoms guaranteed under the European Convention on Human Rights
<b>Local Democracy, Economic Development and Construction Act 2009</b>	The Act seeks to create greater opportunities for community and individual involvement in local decision-making. It also provides for greater involvement of local authorities in local and regional economic development
Local Government Act 2000	<p>This act received Royal Assent in July 2000 and is made up of three parts:</p> <ul style="list-style-type: none"> <li>• Part I introduces a new power for local authorities to promote the economic, social or environmental wellbeing of an area.</li> <li>• Part II requires that all local authorities move away from the traditional committee style of decision making in which all members had a formal decision-making role, to one of four executive models. These are; leader or cabinet, mayor or cabinet, mayor or council manager, or alternative arrangements.</li> <li>• Part III introduces a new ethical framework for councils, including a requirement to adopt a code of conduct for members and implement a standards committee. The general functions of the standards committee are to promote and maintain high standards of conduct within the local authority, and to assist members of the authority to observe the code of conduct.</li> </ul>
Localism Act (2011)	An Act to make provision about the functions and procedures of local and certain other authorities; to make provision about the functions of the Commission for Local Administration in England; to enable the recovery of financial sanctions imposed by the Court of Justice of the European Union on the United Kingdom from local and public authorities; to make provision about local government finance; to make provision about town and country planning, the Community Infrastructure Levy and the authorisation of nationally significant infrastructure projects; to make provision about social and other housing; to make provision about regeneration in London; and for connected purposes.
Equality Act (2010)	<p>This act replaced previous anti-discrimination laws with a single act to make the law simpler and to remove inconsistencies. This makes the law easier for people to understand and comply with. The act also strengthened protection in some situations. The act covers nine protected characteristics, which cannot be used as a reason to treat people unfairly. Every person has one or more of the protected characteristics, so the act protects everyone against unfair treatment. The protected characteristics are:</p> <ul style="list-style-type: none"> <li>• Age</li> <li>• Disability</li> <li>• gender reassignment</li> <li>• marriage and civil partnership</li> <li>• pregnancy and maternity</li> <li>• race</li> <li>• religion or belief</li> <li>• sex</li> <li>• sexual orientation</li> </ul>
Flood and Water Management Act (2010)	This Act provides a more comprehensive management of flood risk for people, homes and businesses, protects water supplies to the

Plan, Strategy or Programme	Summary of objectives and targets
	consumer and helps safeguard community groups from unaffordable rises in surface water drainage charges. The Act introduces into law the concept of flood risk management rather than 'flood defence' and provides the framework for delivery of flood and coastal erosion risk management through national and local risk strategies. The Act establishes a SuDS approving body (SAB). The SAB will have responsibility for the approval of proposed drainage systems in new developments and redevelopments (in accordance with National Standards for Sustainable Drainage). The Act requires Lead Local Flood Authorities (LLFA's) to maintain a register and record important flood risk management strategies and to investigate flooding to determine which authority has responsibility.
London Squares Preservation Act, 1931	This act identifies a London Squares which are to be provided protection from development.
Natural Environment and Rural Communities Act (2006)	The Natural Environment and Rural Communities Act is designed to help achieve a rich and diverse natural environment and thriving rural communities through modernised and simplified arrangements for delivering Government policy. The Act was published by Parliament and is accompanied by a set of explanatory notes, a Regulatory Impact Assessment and a policy statement.
The Neighbourhood Planning (General) Regulations (2012)	The Regulations set out the procedure for the designation of neighbourhood areas and neighbourhood forums and for the preparation of neighbourhood development plans and neighbourhood development orders (including community right to build orders). A separate instrument will be brought forward in relation to neighbourhood planning referendums.
Planning Act (2008)	The Planning Act 2008 was granted Royal Assent on 26 November 2008. The Act introduced a new stream-lined system for decisions on applications to build nationally significant infrastructure projects (NSIPs) in England and Wales, alongside further reforms to the town and country planning system and the introduction of a Community Infrastructure Levy (CIL).
Planning and Compulsory Purchase Act (2004)	The Act received Royal Assent on 13 May 2004 and the provisions of the Act were introduced through a series of Commencement Orders and Regulations. The Act strengthened the focus on sustainability, transparency, flexibility and speed. The aim of the Act is to give effect to the Government's policy on the reform of the planning system, the principal features of which are set out in the policy statement Sustainable communities: Delivering through planning which was published on 23 July 2002.
Planning and Energy Act (2008)	This Act allows local councils to set targets in their areas for on-site renewable energy, on-site low carbon electricity and energy efficiency standards in addition to national requirements. It requires developers to source at least 10% of any new building's energy from renewable sources.
Planning (Listed Buildings and Conservation Areas) Act (1990)	This Act consolidates certain enactments relating to special controls in respect of buildings and areas of special architectural or historic interest.
Pollution Prevention and Control Act 1999	This Act gives the Secretary of State the power to make regulations providing for a new pollution control system to meet the requirements of European Council Directives on Integrated Pollution Prevention and Control and for other measures to prevent and control pollution.
Sustainable Communities Act (2007) (Amendment) Act 2010	The Sustainable Communities Act 2007 provides local authorities and local communities with the opportunity to ask central government to devolve more power to them in order to improve the sustainability of their local area. The amendment improves the process to allow communities a greater say in how their proposed changes can happen

Plan, Strategy or Programme	Summary of objectives and targets
Town and Country Planning Act (1990)	The Town and Country Planning Act 1990 is an act of the British Parliament regulating the development of land in England and Wales
The Town and Country Planning (Environmental Impact Assessment) Regulations (2011)	These regulations are used to determine whether a planning application will require an Environmental Impact Assessment (EIA). These Regulations replace the Town and Country Planning (Environmental Impact assessment (England and Wales) Regulations 1999 (SI No. 293) (“the 1999 regulations”) and subsequent amending instruments. The Town and Country Planning (Environmental impact Assessment) (Mineral Permissions and Amendment) (England) Regulations 2008 remain in force. These Regulations, except for the provisions relating to projects serving national defence purposes, extend to England only. The 1999 Regulations remain in force for Wales.
The Town and Country Planning (Environmental Assessment and Permitted Development) Regulations 1995	These Regulations are concerned with the further implementation in England and Wales of Council Directive 85/337/EEC.
The Town and Country Planning (General Permitted Development) Order 1995	The main purpose of this Order is to grant planning permission for certain classes of development without any requirement for an application to be made under Part III of the Town and Country Planning Act 1990.
The Town and Country Planning (General Permitted Development) (Amendment) (England) Order (2008)	This order provides permitted development rights for the installation of specified types of microgeneration equipment including solar PV and solar thermal equipment on or within the curtilage of dwelling houses subject to certain criteria.
The Town and Country Planning (General Permitted Development) (Amendment) (England) Order (2010)	This order amends the GPDO 1995 to expand the scope of non-domestic permitted development and amend the procedure by which local authorities make Article 4 Directions. It also gives permitted development rights for buildings used as small scale houses in multiple occupation shared by three to six people, to use as dwelling houses, so that specific planning permission is not required.
The Town and Country Planning (General Permitted Development) (Amendment) (England) Order (2011)	The order amends the Town and Country Planning (General Permitted Development) Order 1995 (“GPDO”)
The Town and Country Planning (Compensation) (England) Regulations (2012)	The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2012 amends the Town and Country Planning (General Permitted Development) Order 1995 (“GPDO”)
The Town and Country Planning (Compensation) (England) (Amendment) Regulations (2014)	The Town and Country Planning (Compensation) (England) Amendment) Regulations 2014 (“the Compensation Regulations”) amend the Town and Country Planning (Compensation) (England) Regulations 2013 to limit the circumstances in which compensation is payable in the event that the new permitted development rights are withdrawn.
The Town and Country Planning (General Permitted Development) (Amendment and Consequential Provisions) (England) Order (2014)	The Town and Country Planning (General Permitted Development) (Amendment and Consequential Provisions) (England) Order 2014 (“the Order”) amends the Town and Country (General Permitted Development) Order 1995 (“the General Permitted Development Order”) to allow new permitted development rights for change of use and, in some cases, for associated operational development. These changes simplify the change of use system and promote the provision of new homes, nurseries and schools in England. The Order also makes consequential amendments to the Town and Country Planning (Development Management Procedure) England

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	Order 2010.
The Town and Country Planning (Local Development) (England) (Amendment) Regulations (2009)	These regulations amend the Town and Country Planning (Local Development) (England) Regulations 2004, which make conditions relating to local development planning.
The Town and Country Planning (Local Planning) (England) Regulations 2012	These regulations amend the Town and Country Planning (Local Development) (England) Regulations 2009, in response to the enactment of the Localism Act 2011
The Town and Country Planning (Major Infrastructure Project Inquiries Procedure) (England) Rules 2005	These rules outline the procedures to be followed for local inquiries into 1) applications for planning permission or 2) the approval of local planning authorities for major developments deemed to have national or regional importance.
The Town and Country Planning (Modification and Discharge of Planning Obligations) Regulations 1992	This Regulation gives further detail to the procedure for appeals against enforced planning obligations.
The Town and Country Planning (Tree Preservation) (England) Regulations 2012	Local planning authorities protect trees in the interests of amenity by making Tree Preservation Orders (TPOs). Provisions are spread across primary and various secondary legislation and different rules apply depending on when the TPO is made.
The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010	This amendment introduces a definition of houses in multiple occupation into the Use Classes Order.
The Town and Country Planning (Use Classes) Order 1987	This Order revokes and replaces the Town and Country Planning Order 1972 as amended by the Town and Country Planning Order 1983.
<b>Planning Framework</b>	
National Planning Policy Framework (NPPF) (2012)	The Government has produced a simple national planning policy framework setting out their priorities for the planning system in England in a single, concise document covering all major forms of development proposals handled by local authorities. All the national planning policies set out in PPSs, MPSs, PPGs and MPGs, have been superseded by the NPPF. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
National Planning Practice Guidance (NPPG) (2014)	On 6 March 2014 the Department for Communities and Local Government (DCLG) launched this planning practice guidance web-based resource. This was accompanied by a Written Ministerial Statement which includes a list of the previous planning practice guidance documents cancelled when this site was launched. For the first time, planning practice guidance is now available entirely online in a usable and accessible way
<b>Government Strategies</b>	
Air Quality Strategy (2007)	The Strategy: sets out a way forward for work and planning on air quality issues; sets out the air quality standards and objectives to be

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	achieved; introduces a new policy framework for tackling fine particles; identifies potential new national policy measures which modeling indicates could give further health benefits and move closer towards meeting the Strategy's objectives.
Biodiversity – The UK Action Plan (1994)	The Action Plan is the UK Government's response to the Convention on Biological Diversity (CBD) signed in 1992. It describes the UK's biological resources and commits a detailed plan for the protection of these resources. The first lists of Priority Species and Habitats were published by Government in 1995 as part of the UK Biodiversity Action Plan (UK BAP). They included over 300 species of which 11 were butterflies and 53 were moths.
Code for Sustainable Homes: Setting the standard in sustainability for new homes (2008)	The Code for Sustainable Homes (the Code) was introduced to improve the overall sustainability of new homes by setting a single national standard within which the home building industry can design and construct homes to higher environmental standards and offers a tool for developers to differentiate themselves within the market. The Code also gives new homebuyers better information about the environmental impact of their new home and its potential running costs.
Code for sustainable homes: technical guidance (2010)	This technical guidance sets out the requirements for the Code for sustainable homes. It sets out the process by which a Code assessment is reached. It aims to make gaining a Code assessment as simple, transparent and rigorous as possible.
Conserving Biodiversity – the UK approach (DEFRA 2007)	This statement has been prepared by the UK Biodiversity Standing Committee <sup>1</sup> on behalf of the UK Biodiversity Partnership. Its purpose is to set out the vision and approach to conserving biodiversity within the UK's devolved framework for anyone with a policy interest in biodiversity conservation. It sets out an approach to biodiversity conservation that is designed not only to meet the commitment to halt the loss of biodiversity by 2010, but to guide action well into the second decade of the 21st century at a time when the challenges faced by the natural environment are great.
Department of Health Public Health Strategy – healthy lives, healthy people (July 2011)	<p>This policy statement sets out the progress the government has made in developing the new public health system. In doing so the paper sets out how the government expect the reformed public health system to work including:</p> <ul style="list-style-type: none"> <li>• clarifying the role of local authorities and the Director of Public Health in health improvement, health protection and population healthcare;</li> <li>• proposals for who is responsible for commissioning the different public health services;</li> <li>• the mandatory services local authorities will be required to provide;</li> <li>• the grant conditions we expect to place on the local authority public health grant;</li> <li>• establishing Public Health England as an Executive Agency to provide greater operational independence within a structure that is clearly accountable to the Secretary of State for Health;</li> <li>• clear principles for emergency preparedness, resilience and response.</li> </ul>
The Sustainable Development Strategy for the NHS, Public Health and Social Care System	This strategy outlines a vision and three goals based on the challenges outlined above to aim for by 2020. It describes the opportunities to reduce our environmental impacts, improve our natural environment, increase readiness for changing times and climates and strengthen social cohesion. It also explores how this can be taken forward as a system and outlines specific areas of focus that can be used to guide action.
Departments of Health and Transport- Active	The Department of Health and Department for Transport jointly published a new Active Travel Strategy. The strategy highlights plans to

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Travel Strategy 2010	put walking and cycling at the heart of local transport and public health strategies over the next decade. The guiding principles for the strategy are that walking and cycling should be everyday ways of getting around – not just for their own sake but also because of what they can do to improve public health, tackle congestion, reduce carbon emissions and improve the local environment
Healthy Weight Healthy Lives: A Cross Government Strategy for England (2008)	This cross-government strategy is the first step in a sustained programme to support people to maintain a healthy weight. It will be followed by a public annual report that assesses progress, looks at the latest evidence and trends, and makes recommendations for further action.
Biodiversity 2020: A strategy for England's wildlife and ecosystem services and its outcomes and actions	This new, ambitious biodiversity strategy for England builds on the Natural Environment White Paper and provides a comprehensive picture of how we are implementing our international and EU commitments. It sets out the strategic direction for biodiversity policy for the next decade on land (including rivers and lakes) and at sea
Noise Policy Statement for England (DEFRA 2010)	This statement sets out the long term vision of Government noise policy, which is to promote good health and a good quality of life through the management of noise within the context of Government policy on sustainable development. The policy seeks to make explicit the implicit underlying principles and aims regarding noise management and control that are to be found in existing policy documents, legislation and guidance.
Plan for Growth – (March 2011)	<p>The Government's economic policy objective is to achieve strong, sustainable and balanced growth that is more evenly shared across the country and between industries. The Plan for Growth contains four overarching ambitions that will ensure the progress is made towards achieving this economic objective. The ambitions are:</p> <ol style="list-style-type: none"> <li>1. to create the most competitive tax system in the G20;</li> <li>2. to make the UK one of the best places in Europe to start, finance and grow a business;</li> <li>3. to encourage investment and exports as a route to a more balanced economy; and</li> <li>4. to create a more educated workforce that is the most flexible in Europe.</li> </ol>
Mainstreaming sustainable development (2011)	This document sets out the Coalition Government's vision for sustainable development and a package of measures to deliver it through the Green Economy, action to tackle climate change, protecting and enhancing the natural environment, and fairness and improving wellbeing, and building a Big Society
Strategic Review of Health Inequalities in England Post 2010 (The Marmot Review)	<p>In November 2008, Professor Sir Michael Marmot was asked by the Secretary of State for Health to chair an independent review to propose the most effective evidence-based strategies for reducing health inequalities in England from 2010. The strategy will include policies and interventions that address the social determinants of health inequalities.</p> <p>The Review had four tasks</p> <ol style="list-style-type: none"> <li>1 Identify, for the health inequalities challenge facing England, the evidence most relevant to underpinning future policy and action</li> <li>2 Show how this evidence could be translated into practice</li> <li>3 Advise on possible objectives and measures, building on the experience of the current PSA target on infant mortality and life expectancy</li> <li>4 Publish a report of the Review's work that will contribute to the development of a post- 2010 health inequalities strategy</li> </ol>
Construction 2025 (2013)	<p>This Strategy is aimed at providing clarity around the existing policy framework and signalling the future direction of Government policy. It aims to realise the shared vision of sustainable construction by:</p> <ul style="list-style-type: none"> <li>• Providing clarity to business on the Government's position by bringing together diverse regulations and initiatives relating to</li> </ul>

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	sustainability; <ul style="list-style-type: none"> <li>• Setting and committing to higher standards to help achieve sustainability in specific areas;</li> <li>• Making specific commitments by industry and Government to take the sustainable construction agenda forward</li> </ul>
Adapting to climate change: national adaptation programme (2013)	The National Adaptation Programme sets out what government, businesses and society are doing to become more climate ready. It contains a register of actions which includes all the actions agreed in the programme so far. It also aligns risks identified in the Climate Change Risk Assessment to actions being undertaken or to be undertaken and the timescales according to each theme.
The Carbon Plan: Delivering our low carbon future (2011)	This plan sets out how the UK will achieve decarbonisation within the framework of our energy policy: to make the transition to a low carbon economy while maintaining energy security, and minimising costs to consumers, particularly those in poorer households.
UK Renewable Energy Strategy (2009)	The Renewable Energy Strategy sets a path towards increasing UK generation of renewable projects. It sets out the actions the Government are taking to ensure the targets of producing 15% of UK energy needs from renewable energy sources by 2020 are met. To achieve this the strategy calls for; <ul style="list-style-type: none"> <li>• 30% of electricity supply to come from renewable sources, including 2% from micro-generation</li> <li>• 12% of heat supply to come from renewable sources</li> <li>• 10% of transport supply from renewable sources</li> </ul>
UK Sustainable Procurement Action Plan (2007)	The Government launched a package of actions to deliver the step change needed to ensure that supply chains and public services will be increasingly low carbon, low waste and water efficient, respect biodiversity and deliver wider sustainable development goals. The Action Plan puts in place clear lines of accountabilities and reporting, and develops plans to raise the standards and status of procurement practice in Government which will strengthen delivery of these targets.
Future Water: The Government's Water Strategy for England (2011)	This includes: sustainable delivery of secure water supplies, an improved and protected water environment, fair, affordable and cost-reflective water charges, reduced water sector greenhouse gas emissions and more sustainable and effective management of surface water.
Waste Management Plan for England (2013)	The waste management plan for England (WMPE) provides an analysis of the current waste management situation in England and fulfils the mandatory requirements of article 28 of the revised Waste Framework Directive (rWFD). The plan does not introduce new policies or change the landscape of how waste is managed in England. Its core aim is to bring current waste management policies under the umbrella of one national plan.
<b>Guidance and Other Reference Documents</b>	
A Practical Guide to the Strategic Environmental Assessment Directive (2005)	Practical guidance, published in September 2005, on applying European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment".
BREEAM (Building Research Establishment Environmental Assessment Method) (2008)	BREEAM addresses wide-ranging environmental and sustainability issues and enables developers and designers to prove the environmental credentials of their buildings. It uses a straightforward scoring system that is transparent, easy to understand and supported by evidence-based research; has a positive influence on the design, construction and management of buildings and sets and maintains a robust technical standard with rigorous quality assurance and certification
Department of Health: Next Step Review:	High Quality Care for All sets a new foundation for a health service that empowers staff and gives patients choice. It ensures that

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High Quality Care for All (2008)	health care will be personalised and fair, include the most effective treatments within a safe system, and help patients to stay healthy.
Environment Agency - Creating a better place. Our corporate strategy (2010-2015)	This strategy sets out the Environment Agency's aims for the period to 2015 and describes the role they will play in being part of the solution to the environmental challenges society faces. It sets out how the EA will continue to review their priorities and ways of working to ensure value for money whilst creating a better place for people and the environment..
Environment Agency – Climate Change, adapting for tomorrow (2009)	This report shows how the Environment Agency are working, often in partnership with others, to help communities and businesses adapt, while still protecting the natural environment.
Environment Agency – Building a better environment. A guide for developers (2006)	This guide provides advice on making sure development contributes to the long-term environmental quality of our country. The guide gives practical advice on each of the environmental issues that may affect a site. This ranges from how you can reduce flood risk through to creating quality green space in your development. It gives pointers for building sustainable, cost-effective homes, helping create an environment in which people will really want to live. It also provides examples of sites where this good practice has already been applied.
Environment Agency State of Environment Report for Southwark (2010)	This report provides a snapshot of the environment in the London Borough of Southwark. It outlines trends and changes in the environment, and highlights some of the work being carried out in the local areas to improve the environment, and people's experience of it. The report has been compiled as an extension of the London State of the Environment report to provide a local focus on the boroughs and the health of their environment.
Neighbourhood Planning (2013)	Information on what neighbourhood planning is, why it matters, how it works, and sources of advice and support available for communities.
English Indices of Deprivation 2010	The Index of Multiple Deprivation 2010 combines a number of indicators, chosen to cover a range of economic, social and housing issues, into a single deprivation score for each small area in England. This allows each area to be ranked relative to one another according to their level of deprivation.
Model Procedures for the Management of Contaminated Land- Environment Agency.	<p>The Model Procedures for the Management of Land Contamination, CLR 11, have been developed to provide the technical framework for applying a risk management process when dealing with land affected by contamination.</p> <p>The process involves identifying, making decisions on, and taking appropriate action to deal with land contamination in a way that is consistent with government policies and legislation within the UK.</p>
Natural England: A Natural Development (2009)	The Natural Development Project launched on 3 November 2009 to demonstrate how both large and small scale development can incorporate green infrastructure in practice. Natural England and key players in the development sector formed a partnership to understand how to value, design and create quality green infrastructure. The partnership aims to demonstrate how – at different scales and locations – the contribution of the natural environment in regeneration can move from that of traditional landscaping to one of providing vital spaces for people, wildlife, health, wellbeing, and climate change adaptation. The Natural Development project will provide a focus for our engagement with real sites and enable us to practically demonstrate positive planning with developers. It will work to highlight opportunities and overcome barriers to success and enable sharing of best practice to support the mainstreaming of green infrastructure in development and regeneration.

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	<p>Over the coming months and years the project will collect and share:</p> <p>Case Studies, focusing on a range of sites – initially in the Thames Gateway, and widening out as the project progresses.</p> <p>Commentary on problems, opportunities, and issues for large and small scale developments.</p> <p>Technical information relating to our work with developers across the country.</p>
English Heritage Conservation Principles: for the sustainable management of the historic environment (2008)	This document contains policies and guidance for the sustainable management of the historic environment.
English Heritage, Guidance on Environmental Assessment, Sustainability Appraisal and the Historic Environment (2010)	This guidance focuses on SEA/SA for development plans, building on existing Government advice, it is equally applicable to the preparation of SEAs for other types of documents, such as Local Transport Plans and Water Resource Management Plans.
Guidance on Tall Buildings CABE and English Heritage (2007)	The aim is to 'ensure that tall buildings are properly planned'. The document is for use as a basis for assessment for specific local projects in local policy and guidance preparation. The most important issues are making sure that tall buildings of high architectural quality, that they have a positive impact on the environment and area, and that they are supported by services, transport etc.
Conservation Bulletin 47: Characterisation, English Heritage (2005)	A bulletin that explores the subject of characterisation and sets out some examples of studies of local character.
Understanding Place: Historic Area Assessments in a Planning and Development Context, English Heritage (2010)	Sets out guidance for undertaking Historic Area Assessments to inform plan making and development management.
Understanding Place Historic Area Assessments: Principles and Practice, English Heritage (2010)	Sets out guidance for how to undertake assessments for historic areas in order to produce a Historic Area Assessment.
Valuing Places: Good Practice in Conservation Areas, English Heritage (2011)	Sets out a series of exemplary case studies for managing change in the historic environment.
The Setting of Heritage Assets, English Heritage (2011)	Sets out guidance for managing change within the settings of heritage assets.
Seeing The History In The View: A Method For Assessing Heritage Significance Within	Sets out a method for understanding and assessing heritage significance of views.

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Views, English Heritage (2011)	
Understanding Place: Character and context in local planning, English Heritage (2011)	Sets out case studies for how historic characterisation can be used to inform plan making and development management decisions.
Understanding Place: Conservation Area Designation, Appraisal and Management, English Heritage (2011)	Sets out guidance for managing change in a way that conserves and enhances historic areas through conservation area designation, appraisal and management.
Good Practice for Local Listing Consultation Draft, English Heritage (2011)	Sets out best practice guidance for identifying buildings and structures suitable for local listing and for managing the list.
Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, ICOMOS (2010)	Sets out guidance for producing Heritage Impact Assessments for World Heritage Sites in order to evaluate the impact of potential development on the Outstanding Universal Value. This may also provide a guide for assessing general impact of development on heritage assets and their settings.
National Institute for Health and Clinical Excellence (NICE):Alcohol-use disorders: preventing harmful drinking	The guidance identifies how government policies on alcohol pricing, its availability and how it is marketed could be used to combat such harm. Changes in policy in these areas are likely to be more effective in reducing alcohol-related harm among the population as a whole than actions undertaken by local health professionals.
National Institute for Health and Clinical Excellence (NICE): Prevention of Cardiovascular disease at the population level	<p>The guidance is for government, the NHS, local authorities, industry and all those whose actions influence the population's cardiovascular health (that is, can help keep people's hearts healthy and prevent strokes). The guidance comprises two sets of recommendations aimed at national policy makers and local practitioners respectively.</p> <p>Recommendations 1 to 12 outline a national framework for action. They break new ground for NICE by focusing on legislative, regulatory and voluntary changes – including further development of existing policies. Topics covered include:</p> <ul style="list-style-type: none"> <li>• How to reduce the nation's consumption of salt, saturated fats and trans fats</li> <li>• How to ensure food marketing and promotions aimed at children and young people do not encourage them to consume high levels of salt, saturated fats and trans fats</li> <li>• Commercial interests</li> <li>• Food product labelling</li> <li>• The European Union's common agricultural policy</li> <li>• Public sector catering guidelines</li> <li>• Advice on take-aways and other food outlets.</li> </ul>
National Institute for Health and Clinical Excellence (NICE): Preventing unintentional injuries among children and young people aged under 15: road design and modification	<p>This is one of three pieces of NICE guidance published in November 2010 on how to prevent unintentional injuries among under-15s. A second publication covers unintentional injuries in the home and a third covers strategies, regulation, enforcement, surveillance and workforce development. The guidance covers 20 mph limits, 20mph zones and engineering measures to reduce speed or make routes safer. The recommendations include advice on:</p> <ul style="list-style-type: none"> <li>• How health professionals and local highways authorities can coordinate work to make the road environment safer.</li> <li>• Introducing engineering measures to reduce vehicle speeds, in line with Department for Transport guidance.</li> <li>• Making routes commonly used by children and young people safer. This includes routes to schools and parks.</li> </ul>

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National Institute for Health and Clinical Excellence (NICE): Promoting physical activity: active play and sport for pre-school and school-age children and young people in family, pre-school, school and community settings	<p>This guidance is for all those who are involved in promoting physical activity among children and young people, including parents and carers. The NICE recommendations give advice on:</p> <ul style="list-style-type: none"> <li>• how to promote the benefits of physical activity and encourage participation</li> <li>• high level strategic planning</li> <li>• the importance of consultation with children and young people and how to set about it</li> <li>• planning and providing spaces, facilities and opportunities</li> <li>• training people to run programmes and activities</li> <li>• how to promote physically active travel such as cycling and walking.</li> </ul>
National Institute for Health and Clinical Excellence (NICE): Promotion and creation of physical environments that support increased levels of physical activity	<p>This guidance offers the first evidence-based recommendations on how to improve the physical environment to encourage physical activity. It is for NHS and other professionals who have responsibility for the built or natural environment. This includes local transport authorities, transport planners, those working in local authorities and the education, community, voluntary and private sectors. The seven recommendations cover strategy, policy and plans, transport, public open spaces, buildings and schools. They include:</p> <ul style="list-style-type: none"> <li>• Ensure planning applications for new developments always prioritise the need for people (including those whose mobility is impaired) to be physically active as a routine part of their daily life.</li> <li>• Ensure pedestrians, cyclists and users of other modes of transport that involve physical activity are given the highest priority when developing or maintaining streets and roads.</li> <li>• Plan and provide a comprehensive network of routes for walking, cycling and using other modes of transport involving physical activity.</li> </ul>
Planning sustainable cities for community food growing (2014)	<p>This guide brings together in one place examples of planning policies around the UK that support community food growing. It is aimed primarily at planning authorities to help them to use food growing as a way of creating healthy communities.</p>

## Regional

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<b>Air Quality</b>	
Air Quality Strategy (2010)	This strategy sets out a framework for delivering improvements to London's air quality and includes measures aimed at reducing emissions from transport, homes, offices and new developments, as well as raising awareness of air quality issues. Over the last few years, a number of innovative measures have been introduced to help improve air quality in London. Nevertheless, air pollution remains a problem in the capital, as is clear from the fact that European Union targets for air quality standards that were intended to be met in 2004 and 2005 have still not been achieved.
The control of dust and emissions from construction and demolition - Best Practice Guidance (2014)	The GLA and London Councils have produced 'Best Practice Guidance' to control dust and emissions from construction and demolition. The Guidance will be used to inform the planning process within London boroughs; assisting developers in understanding the methods available to them and what London boroughs might expect. The Guidance will be reviewed regularly, in order to update new best practice in dust and emissions management.
<b>Equality</b>	
Focus on London: The Hidden City (2013)	
A Digital Inclusion Strategy for London (2015)	This strategy outlines why digital exclusion is an issue for London and how the Mayor can work with partners to address the barriers people face to getting online. It provides data on the numbers and groups of people that are digitally excluded. It then explains the cost of digital exclusion to the individual, society and the economy. The Mayor is keen to use his office to work with partners to ensure as many Londoners who want to get online, have the opportunity to do so.
Equal Life Chances for All (2015)	The Equal Life Chances for All framework 2014 highlights the Mayor's commitment to tackling inequality; improving life chances, and removing barriers that prevent people from reaching their full potential. The GLA will ensure that equality is mainstreamed into everything the organisation does, including how it obtains goods and services.
Mayors Annual Equality Report 2013/2014	The Mayor's Annual Equality Report 2013/2014 highlights the progress made during the financial year April 2013 to March 2014 towards achieving the GLA's revised equality objectives. It also gives the latest figures and trends for the indicators of progress.
Equal Life Chances for All – Measures Report (2011)	The Equal Life Chances for all Measures report sets out the most recent trends on measures of the delivery of policies and programmes directly under the control of the Mayor and his partners as well as statistical measures outside the Mayor's direct influence.
Poverty in London: 2012/13	The number of Londoners living in poverty has seen little change over the last few years and remains at around 2.2 million people, or 28 per cent of all those living in the region, averaged over three years 2010/11-2012/13. Around 300,000 children in Inner London are living in poverty, with a further 400,000 in Outer London. The Inner London child poverty rate remains significantly higher than for any other region, at 45 per cent. Inner London also stands out as having exceptionally high rates of material deprivation among pensioners – more than double the rate for any other region with almost one in four unable to have or take part in the social norms for that population group for reasons of poverty, health or isolation.
A Fairer London: The 2014 Living Wage in London	This is the tenth London Living Wage report from the GLA, and calculates the wage for 2014 at £9.15 per hour (a 4.0 per cent increase on the 2013 wage). In the Mayor's '2020 Vision' for London he pledged to make the Living Wage the norm across the capital. There are now over 400 accredited London Living Wage employers plus a number who have chosen not to be accredited. Accredited Living Wage

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	employers alone have now provided over 20,000 London workers the benefits of the Living Wage since 2011.
Accessible London: Achieving an Inclusive Environment SPG (2014)	This SPG provides guidance on the implementation of <b>London Plan Policy 7.2 An inclusive environment</b> and of other policies in the Plan with specific reference to inclusive design. It also provides guidance on Lifetime Neighbourhoods to support London Plan <b>Policy 7.1 Building London's neighbourhoods and communities</b> . One of the Mayor's aims for London is that everyone, whether resident, visitor or worker, is able to participate and enjoy all that the city has to offer. To help achieve this aim the London Plan 2011 includes a number of policies which promote an inclusive environment to help ensure that all of London's diverse communities can contribute to London's growing economy and enjoy a high quality of life.
Violence Against Women and Girls Strategy 2013-2017	This strategy covers the following forms of violence against women and girls: <ul style="list-style-type: none"> <li>• Domestic violence and abuse</li> <li>• Female Genital Mutilation (FGM)</li> <li>• Forced marriage</li> <li>• 'Honour'-based violence</li> <li>• Prostitution and trafficking</li> <li>• Sexual violence including rape</li> <li>• Sexual exploitation</li> <li>• Sexual harassment</li> <li>• Stalking</li> <li>• Faith-based abuse.</li> </ul> This strategy is focused on the needs of women and girls and is a deliberate response to the disproportionate impact of VAWG crimes on women and girls.
Police and Crime Plan 2013	The Police and Crime Plan 2013-2016 outlines the Mayor's mission, priorities and objectives for tackling crime and making London safer.
2013 Round Ethnic Group Population Projections	The White population of Greater London is projected to be fairly stable at about 4.9 million over the next decade and increase very slightly thereafter, reaching 5.1 million in 2041. The BAME population of Greater London is projected to increase from 3.3 million in 2011 to 5.2 million in 2041. By the Census year 2011 the Black African population (576 thousand) had surpassed the Indian population (545 thousand) to become the biggest individual BAME ethnic group in Greater London
Hate Crime Reduction Strategy (20xx)	The strategy sets out plans to boost confidence across all communities in reporting hate crime, develop ways to prevent offences and reduce repeat victimisation and outlines how agencies can work together to ensure swift and sure justice for victims. Hate crime is defined as any criminal offence which is perceived, by the victim or any other person, to be motivated by a hostility or prejudice based on a personal characteristic, specifically race, religion/ faith, sexual orientation, disability and transgender identity.
London Enriched (2009) and update (2013)	London Enriched is the Mayor's refugee integration strategy, setting out a vision for refugee integration in the capital, focusing on the right of refugees to live in dignity and security, sharing with other Londoners the same life chances and opportunities to contribute.
An evidence base on migration and integration in London (2010)	The report begins with a literature and demographic review presenting a picture of migration in London and the key issues around migrant integration. This draws together the state of the academic and policy literature with as recent as possible primary data provided by the GLA and UK Border Agency and original data analysis conducted by COMPAS. The work was conducted over two months in Spring 2010. The report presents the broad contours of the contemporary migration landscape in London, before looking at each of the Mayor's integration strategy core themes in terms of barriers and factors to successful integration and policy implications arising. It concludes with a framework of interventions, noting the policy priorities arising from the evidence for each of the themes.
Planning for Equality and Diversity in London SPG (2007)	This SPG: <ul style="list-style-type: none"> <li>• provides guidance to boroughs, partners and developers on the implementation of policies in the London Plan which relate to</li> </ul>

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	<p>equalities issues and addressing the needs of London's diverse communities;</p> <ul style="list-style-type: none"> <li>• sets out some of the tools for promoting equality and diversity in planning processes;</li> <li>• highlights the spatial impacts of wider socio-economic issues such as poverty and discrimination in the planning context;</li> <li>• sets out overarching principles and the key spatial issues for planning for equality; and examines in greater detail the spatial needs of London's diverse communities and identifies how spatial planning can be used to try and address these</li> </ul>
Responding to the needs of faith communities: Report and evidence (2008)	CAG Consultants with Diverse Ethics and Land Use Consultants were commissioned by the GLA in late 2007 to explore the needs of faith communities in relation to places of worship in London. This document reports on our findings and conclusions from the research and engagement process with faith communities and planning authorities in relation to places of worship in London.
<b>Culture</b>	
Cultural Metropolis 2014 - The Mayor's culture strategy for London	The Mayor's Cultural Strategy sets out the vision, priorities and recommendations for how to strengthen the cultural life of Londoners across the capital. It recognises the significance of the cultural and creative sectors in making London a successful world city, and puts forward a case for its continued support and investment. It includes an update on the policy achievements and next steps in: Maintaining London's position as a world city of culture, Widening the reach, Education and skills, Infrastructure, environment and the public realm. It provides a recap of the cultural triumphs and cultural legacy from the Games.
Culture on the high street guide 2013	The <i>Culture on the High Street</i> guide will help local authorities, town centre managers and business improvement districts to improve the quality and ambition of culture on our high street.
Working Paper 48: Culture and regeneration - What evidence is there of a link and how could it be measured? (2011)	Despite much research, there have been few comprehensive evaluations of culture-led regeneration schemes and so a good evidence base does not exist. A review of the limited evidence shows mixed results and much uncertainty of the impact of culture-led regeneration. Current evaluation measures are not appropriate for understanding the long-term and dynamic changes that regeneration schemes may cause and instead these schemes should be monitored, focussing on both people and places.
<b>Design and place shaping</b>	
Shaping Neighbourhoods: Character and Context SPG (2014)	This guidance sets out an approach and process to help understand the character and context of a place so that its results can inform the planning and design process, and guide change in way which is responsive to individual places and locations. A separate non-technical summary sets out the main messages of the SPG. A supporting list of data and research resources is provided as a living document that will be updated as appropriate.
Streetscape Guidance: A guide to better London Streets (2009)	The Streetscape Guidance provides advice on improving and managing the Transport for London Road Network (TLRN) and promotes consistency of approach and excellence in design and workmanship. The document highlights relevant policies and guidance, sets out specific design principles and guidelines including a palette of materials and products, and acts as a best practice resource for London boroughs and other partners.
London View Management Framework Supplementary Planning Guidance, Mayor of London (2012)	The London View Management Framework is a key component of the Mayor's strategy to preserve London's character and built heritage. It outlines the policy framework for managing the impact of development on key panoramas, river prospects and townscape views.
<b>Economy</b>	
London's Economy Today 2015	

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London's Digital Economy (2012)	This report draws together a variety of data sources to highlight London's position in the digital arena. The report looks at uptake and use of digital technologies by businesses and households.
Retail in London: Looking forward (2015)	<p>Through reading the main report you will:</p> <ul style="list-style-type: none"> <li>• Find out how developments such as changing consumer behaviour and technological advances have altered the playing field for London's retailers</li> <li>• See how retailers have adapted by implementing measures such as 'Click-and-Collect' or 'Dark Stores'</li> <li>• Gain an understanding of what these adaptations may mean for the role retail plays in London, ranging from the employment it provides to the land it uses</li> </ul>
Jobs and Growth Plan (London Enterprise Panel) 2014	<p>It will help to deliver jobs and growth for London through:</p> <ul style="list-style-type: none"> <li>• Skills and employment: to ensure Londoners have the skills to compete for and sustain London's jobs;</li> <li>• Micro, small and medium sized enterprises: to support and grow London's businesses;</li> <li>• Digital creative, science and technology: for the capital to be recognised globally as world leading hub; for science, technology and innovation - creating new jobs and growth; and</li> <li>• Infrastructure: to keep London moving and functioning.</li> </ul>
London Labour Market Projections (2013)	This report outlines GLA Economics' latest employment projections and shows that jobs in London are projected to grow by more than 850,000 by 2036. The report also provides future projections for both the occupations and qualifications of those employed in London. The report looks at the level of turnover in the labour market with the analysis suggesting that just over half a million people left their occupation in London in 2012. The report also considers the projected increase in London's population and considers the extent to which the demand for, and supply of, labour is likely to be in balance in the longer term.
Alcohol Consumption in the nighttime economy (2012)	The night-time economy (NTE) is activity which occurs between the hours of 6pm to 6am and involves the sale of alcohol for consumption on-trade (e.g. bars, pubs and restaurants). This work looks at the most effective ways to mitigate the costs associated with alcohol in the NTE. It is combined with a tool which estimates (currently measurable) pros and cons for each London Local Authority. The policy options assessed cover pricing, licensing, premise design and operations, public realm design, service interventions, and community mobilisation.
London's Super Connected City Plan (2012)	London's Super Connected City Plan is ambitious and innovative. It will underpin the capital's aspiration for contiguous ultrafast connectivity, provide the digital infrastructure needed for the new economy and help East London realise its full economic potential. Successful delivery of this plan will be critical to realising the Mayor of London's prime objective: economic growth for London, and job creation for Londoners.
Mayor's Economic Development Strategy (2010)	The Mayor's vision is for London to be the best big city in the world. The Economic Development Strategy sets out this vision with respect to the London economy, and how it can be realised. The Mayor's ambitions are for London to be the World Capital of Business, and to have the most competitive business environment in the world; to be one of the world's leading low carbon capitals, for all Londoners to share in London's economic success and for London to maximise the benefits of the 2012 Olympic and Paralympic games.
Economic Evidence base (2010)	This document aims to provide an economic evidence base to support the three Mayoral strategies that have recently been revised (the London Plan, the Economic Development Strategy and the Transport Strategy).

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GLA Employment Time Series (2010)	<p>Roger Tym and partners were commissioned by the GLA to produce historic and projected employment data by sector and borough. The objectives are:</p> <ul style="list-style-type: none"> <li>• To provide a sectoral breakdown of both historic employment data and the latest GLA Economics employment projections for London to 2031 using at least the established 'RTP definitions' of Offices, Industry and Other and;</li> <li>• To provide the sectoral breakdown above for all London Boroughs plus sub-totals showing the Central Activities Zone (CAZ), Isle of Dogs (IOD), rest of Inner London, Outer London and the sum Total for London.</li> </ul>
London Office Policy Review (2014) Update	<p>The London Office Policy Review is the most recent in a series of independent reviews of office market trends commissioned by the GLA. It includes robust Monitoring Benchmarks and associated time series data to illustrate key trends and market relationships and their bearing on policy. LOPR 12 includes:</p> <ul style="list-style-type: none"> <li>• A review of office-based employment projections and office floor space need estimates to inform future alterations to the London Plan</li> <li>• An assessment of the impact of recent economic events on different parts of the London office market, and those which might be anticipated in the future</li> <li>• A review of London Plan town centre office development guidelines and associated policy proposals</li> <li>• An investigation of the 'mega-schemes' identified in LOPR 2009, their implications for office development within the Central Activities Zones, on its fringes, or beyond</li> <li>• Consideration of the potential for conversion of surplus office space to other uses, especially residential, in different parts of London</li> <li>• An overview of hybrid office/industrial buildings, their locational attributes and implications for office, industrial, transport and other policies.</li> </ul>
London Business Survey (2014)	<p>The 2014 London Business Survey is an innovative survey designed by the Office for National Statistics, on behalf of the London Enterprise Panel and the GLA. The survey covers a wide range of topics including the profile of London business, their performance and outlook, workforce, trade, and London as a place to do business.</p>
Land for Industry and Transport SPG (2012)	<p>This draft document sets out proposed guidance to supplement the policies in the 2011 London Plan relating to land for industrial type activities and transport. The SPG provides advice on how to implement these policies, in particular Policy 2.17 on Strategic Industrial Locations, Policy 4.4 on Managing Industrial Land and Premises; and Policy 6.2 on Providing Public Transport Capacity and Safeguarding Land for Transport. Once adopted it will replace the 2004 Industrial Capacity SPG</p>
London Industrial Land Demand and Release Benchmarks, Roger Tym & Partners (2012)	<p>The Industrial Land Demand and Release Benchmarks Study assesses future demand for industrial land across London and compares it with the current and planned supply. The aim of the study is to provide evidence to inform London-wide and local planning policy in order to ensure that London has the right quantity and quality of industrial land to support its economy and its population while using the land efficiently. Where there is evidence of an over-supply, the study estimates how much land may be released to other uses and makes recommendations for the management of surplus capacity.</p>
Understanding the demand for and supply of visitor accommodation in London to 2036	<p>GLA Economics was asked by the Greater London Authority (GLA) London Plan team to update work surrounding the demand for serviced visitor accommodation to see whether the existing London Plan benchmark target (Policy 4.5) for serviced rooms needed revising. The work was to also include an update around the accessibility of serviced visitor accommodation. The first part of this report examines the supply side of the London market. It sets out the best estimate of the current supply of serviced (and non-serviced) visitor accommodation in London. It also looks at the potential growth in supply of visitor accommodation over time (from focusing on the</p>

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	supply side only). The report then moves onto the demand side, illustrating how visitor nights in London have moved over time. It sets out how GLA Economics has gone about projecting visitor nights over time and its central projection for visitor nights. The report finishes with the projection for nights converted into the likely requirement for serviced visitor accommodation over time.
Accessible Hotels in London (2012)	This report was commissioned by Design for London (DfL)/London Development Agency (LDA) and Greater London Authority (GLA) to provide evidence to inform a new London Plan policy on the percentage of accessible hotel bedrooms required to meet demand now and over the next 20 years. A room which is 'accessible' is defined as one which minimises barriers to use for as many people as possible. It is a wider definition than a room being wheelchair accessible as it allows use by people with disabilities other than mobility impairments. Policy and planning requirements have previously been based around the definition of wheelchair accessibility, but this is now considered to be too narrow a definition of disability, as well as being based on an outdated medical model of disability.
Cornered shops: London's small shops and the planning system (2010) and addendum	This report looks at how the planning system, and other initiatives, can provide support for London's small shops and neighbourhood shopping areas. It seeks to identify the benefits of small, local and independent retailers to London; the evidence there is to show that they are under threat; the policies that have been proposed to support small shops; and what progress has been made in implementing them.
London's Retail Street Markets (June 2010)	This is a research report commissioned by the LDA. It provides a spatial and economic analysis of the retail street markets in London and identifies the area based issues facing these markets. The analysis also considers the contribution street markets can and are making to London's economy. The study has been used to inform the LDA (and the wider GLA group) what role they could have in supporting street markets. The study includes research on all types of London retail markets (such as clothing, arts, food etc) but exclude wholesale markets.
Managing the Night Time Economy PDF(March 2007)	This is one of a series of best practice guides issued by the Mayor to demonstrate how the broad policies of the London Plan can be implemented locally. This Best Practice Guide suggests how public authorities and the private and voluntary sectors can work together to support the development of the night time economy in appropriate locations and improve the way they manage its impacts.
London Town Centre Health Check (2013)	The 2013 London Town Centre Health Check is the latest in the ongoing series of strategic London-wide health checks undertaken by the Greater London Authority with support from the London boroughs. It provides a 'snapshot' of the health of over 200 of London's town centres using a selection of strategic health check indicators and illustrates how these have changed over time.
Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (2013)	Government policy in the National Planning Policy Framework requires the GLA and boroughs to assess the overall need for additional floorspace for economic uses, including retail and leisure development. This study assesses the scale and nature of consumer expenditure in London for comparison goods retail, convenience goods retail, and other expenditure including leisure over the period from 2011 to 2036. It focuses on strategic requirements for comparison goods retail floorspace need in London, distributed to boroughs and individual town centres. The project is both current and forward-looking, factoring in major retail pipeline developments in and around the capital and contains three additional scenarios to test alternative spatial patterns of growth and quality.
Accommodating Growth in Town Centres: Achieving Successful Housing Intensification and High Street Diversification (2014)	The 'Accommodating Growth in Town Centres' report assesses the changing nature of retail and the capacity and deliverability of housing intensification in and around town centres, while encouraging a diverse range of enterprises and the spaces they need on High Streets.
Artists Workspace Study: We made that (2014)	
Supporting Places of Work: incubators,	The GLA appointed URS, Ramidus, #1Seed and Gort Scott to carry out research into the supply of existing Incubators, Accelerators

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accelerators and co-working spaces (2014)	and Co-working (IAC) spaces in London, which was the first study into the emerging sector of this kind. The report recommends the creation of a workspace provider network, through which IACs can inform emerging workspace policies, share learnings, and engage with boroughs and developers. The report also recommends the creation of an online interactive map to make IAC spaces visible to Londoners. The report concludes that any future public sector investment should focus on IACs with clear community outreach goals (e.g. providing training for disadvantaged groups, providing subsidised workspace) as well as being combined with wider initiatives to maximise public outcome.
Cross River Partnership business plan (2014)	Cross River Partnership (CRP) is a public-private partnership that was originally formed to deliver cross-river infrastructure projects such as the Millennium Bridge. CRP has since diversified to deliver a wide range of externally-funded, multi-partner regeneration projects.
Town Centres SPG (2014)	<p>This SPG provides guidance on the implementation of London Plan Policy 2.15 Town centres and of other policies in the Plan with specific reference to town centre development and management. It also provides guidance on Policy 2.16 Strategic Outer London Development Centres and their potential to be developed as business locations with distinct strengths of greater than sub regional importance. To support the policies in the London Plan this SPG includes guidance on:</p> <ul style="list-style-type: none"> <li>• Supporting the evolution and diversification of town centres</li> <li>• Delivering mixed use housing intensification</li> <li>• Quality matters</li> <li>• Promoting Accessibility and Connectivity</li> <li>• Town centre regeneration and initiatives</li> <li>• Proactive town centre strategies</li> <li>• Strategic Outer London Development Centre implementation guidelines</li> </ul>
The Mayor's Action for High Street (2014)	It also outlines what the Mayor and his staff will do to help high streets, including how to diversify and grow and the support on offer from the Mayor's regeneration team. It makes the case for investment and how the Mayor will lobby to protect the future of London's high streets.
<b>Energy and Climate Change</b>	
Delivering London's Energy Future: the Mayor's climate change mitigation and energy strategy (2011)	Delivering London's Energy Future is the Mayor's climate change mitigation and energy strategy. It sets out his strategic approach to limiting further climate change and securing a low carbon energy supply for London. To limit further climate change the Mayor has set a target to reduce London's CO <sub>2</sub> emissions by 60 per cent of 1990 levels by 2025. Delivering London's Energy Future details the programmes and activities that are ongoing across London to achieve this.
Managing risks and increasing resilience: the Mayor's climate change adaptation strategy (2011)	Managing risks and increasing resilience is the Mayor's climate change adaptation strategy for London. It details his strategic approach to managing the climate risks we face now and in the future in order to maintain London as one of the best big cities in the world.
Climate Change Adaption Strategy for London (2010)	<p>The Mayor's Climate Change Adaptation Strategy:</p> <ul style="list-style-type: none"> <li>• identifies who and what is most at risk today</li> <li>• analyses how climate change will change the risk of flood, drought and heatwave through the century</li> <li>• describes what action is needed to manage this and who is responsible for it.</li> </ul>

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	<p>The key actions proposed in the strategy are:</p> <ul style="list-style-type: none"> <li>• To improve our understanding and management of surface water flood risk</li> <li>• An urban greening programme to increase the quality and quantity of greenspace and vegetation in London – this will buffer us from floods and hot weather</li> <li>• To retro-fit up to 1.2m homes by 2015 to improve the water and energy efficiency of London homes</li> </ul>
Decentralised Energy Capacity Study (2011)	This publication is formed of three reports providing data on, and analysis of, the potential for renewable and low carbon energy in London. This regional assessment breaks down the types of energy that can contribute to the Mayor's target to supply 25 percent of London's energy from decentralised sources by 2025.
<b>Flood Risk</b>	
Thames Region Catchment Flood Management Plan, 2009	This plan presents what the Environment Agency considers the most sustainable direction for the management of fluvial flood risk within the region for the next 50 to 100 years. It is based on extensive research into the catchment characteristics of the region and the options available for managing the risk to people, properties and the environment. It takes into account the likely impacts of climate change and the plans for future development.
Regional Flood Risk Appraisal (2009)	In June 2007 the Mayor published the draft Regional Flood Risk Appraisal (RFRA) for the London Plan, for public consultation. The RFRA examines the nature and implication of flood risk in London and how the risk should be managed.
<b>Health and well-being</b>	
Individual well-being in London (2014)	Over the past four years, the UK Government has sought to understand the subjective well-being of individuals as an alternative measure of the relative 'health' of a country compared to traditional measures such as GDP. This analysis presents findings for London and examines variations in how individuals assess their own well-being according to a number of different personal characteristics. Among those characteristics exhibiting the largest levels of variation in well-being are qualification level, health and disability status, along with some variation seen across different age and ethnic groups.
London Mental Health: The invisible costs of mental ill health (2014)	This report aims to, where possible, quantify the impact of mental ill health in London in order to highlight the scale of the problem. It does this through analysing the wider economic and social impacts of mental ill health. As such the measurement and quantification of the costs of mental ill health go beyond usual measures of economic output, or Gross Value Added (GVA) to consider, amongst other things, so-called 'non-market' impacts, for instance the impact on individuals' quality of life from mental ill health. The intention is for this to provide for a more 'all-encompassing' measure of the economic and social costs of mental ill health to London.
The London Health Inequalities Strategy (2010)	<p>The London Health Inequalities Strategy sets out the Mayor's commitments to work with partners to:</p> <ol style="list-style-type: none"> <li>1 Promote effective parenting, early years development, young people's emotional health and readiness for learning</li> <li>2 Motivate and enable Londoners to adopt healthier behaviours and engage in lifelong learning</li> <li>3 Build knowledge about health and wellbeing, tackling stigma and taboo in the process</li> <li>4 Promote community development approaches to improve health, and actively support the role of the third sector</li> <li>5 Build public sector capacity to engage more effectively with individuals, communities and the Voluntary and Community Sector (VCS).</li> </ol>
The London Health Inequalities Strategy: First Steps to Delivery (2012)	This 'First Steps to Delivery' plan sets out the actions prioritised to 2012 against the thirty high-level commitments which form the bedrock of the strategy.

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Takeaways Toolkit: Tools, interventions and case studies to help local authorities develop a response to the health impacts of fast food takeaways (2012)	<p>Takeaways may be good for London's economy, but they're often bad for Londoners' health. To help London boroughs balance these conflicting priorities and understand the options available when considering the health impacts of fast food, we've created a 'takeaways toolkit'. The toolkit has three main recommendations for boroughs:</p> <ul style="list-style-type: none"> <li>• <b>making food healthier</b> – working with takeaway businesses and the food industry to make healthier fast food.</li> <li>• <b>starting them young</b> – schools should have strategies to reduce the amount of unhealthy food children eat at lunch and on their journey to and from school.</li> <li>• <b>planning for health</b> – use regulatory and planning measures to address the proliferation of hot food takeaway outlets.</li> </ul>
Health: Children and Young People (2010)	<p>Health: Children and Young People is the second report in the Focus on London 2010 series. This chapter, authored by the London Health Observatory, provides recent evidence on the health experience of children and young people in London. The report includes data about the Local Index of Child Wellbeing, infant mortality, breastfeeding, immunisation, injury, childhood obesity, physical activity, diet, smoking, alcohol consumption, drug use, teenage conceptions and sexual health. It reveals many areas of inequality within the city, but also highlights the ways in which London's children are doing well.</p>
A Sporting Future for London (2009)	<p>This plan is about increasing participation in sport and physical activity. It aims to deliver a grass-roots sporting legacy for Londoners from the 2012 Olympic and Paralympic Games by:</p> <ul style="list-style-type: none"> <li>• securing a sustained increase in participation in sport and physical activity amongst Londoners</li> <li>• using sport to assist in tackling social problems including ill health, crime, academic underachievement and lack of community cohesion.</li> </ul>
NHS London: Strategic Plan (2008)	<p>A strategic plan that sets out an ambitious programme of work to deliver high-quality, value for money services.</p>
Healthcare for London: A Framework for Action (2007)	<p>Healthcare for London: A Framework for Action presents a powerful vision of how different healthcare in London could be – safer, more accessible, higher quality – and of how much healthier Londoners could become. Its recommendations include innovation and challenge in equal measure.</p>
<b>Heritage</b>	
English Heritage's Heritage at Risk- London (2011)	<p>The Register identifies which heritage assets are at risk from development pressures, neglect or decay. It also monitors the changing condition of assets in order to help us prioritise where resources and expertise can best be deployed to resolve the problems. It also includes listed buildings and scheduled monuments, Conservation Areas, Registered Parks and gardens.</p>
The National Heritage List for England	<p>The Register identifies all registered heritage assets including listed buildings, scheduled monuments, protected wreck sites, registered parks and gardens, registered battlefields, world heritage sites, applications for certificates of immunity (COIs) and current building preservation notices (BPNs).</p>
London World Heritage Sites - Guidance on Settings (2012)	<p>The London Plan sets out policies to conserve and enhance London's World Heritage Sites and their settings, and states that the Mayor will produce guidance on defining the settings of London's World Heritage Sites. There are four World Heritage Sites and one potential site on the Tentative List in London:</p> <ul style="list-style-type: none"> <li>• Palace of Westminster and Westminster Abbey, including St Margaret's Church</li> <li>• Tower of London</li> <li>• Maritime Greenwich</li> </ul>

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	<ul style="list-style-type: none"> <li>• Royal Botanic Gardens, Kew</li> <li>• Darwin Landscape Laboratory (Tentative List)</li> </ul> <p>Each has been designated because of its outstanding universal value of international significance. The sites themselves are set in a very dynamic, complex urban environment in which pressure for development is high. However one of the things that makes London distinctive is the way it combines old and new, protecting heritage but encouraging change. The Mayor has brought forward guidance on how this dynamic relationship can be managed in ways that protect the value of the sites and whilst also allowing the city to grow and change around them</p>
<b>Housing</b>	
Housing supplementary planning guidance (2012)	The SPG provides guidance on how to implement the housing policies in the 2011 London Plan. In particular, it provides detail on how to carry forward the Mayor's view that "providing good homes for Londoners is not just about numbers. The quality and design of homes, and the facilities provided for those living in them, are vital to ensuring good liveable neighborhoods". It is informed by the Government's National Planning Policy Framework and by its Housing Strategy for England.
London Housing Strategy (2014)	The Mayor's strategy aims to put in place the resources to deliver more than 42,000 new homes a year, but achieving this ambition will require the full commitment of the London boroughs, of government, and of private and public sector developers. The Mayor believes that only by working together can we agree a long-term financial settlement with national government, free up local councils to build, promote institutional investment in new housing, bring forward surplus public land and develop Housing Zones across the capital to drive delivery. The strategy also aims to make sure that the homes we build better reward those who work hard to make this city a success – by massively increasing opportunities for home ownership, by improving the private rented sector and by ensuring working Londoners have priority for affordable homes to rent.
Housing in London (2014)	Housing in London is the evidence base for the Mayor's London Housing Strategy, summarising key patterns and trends across a wide range of topics relevant to housing in the capital.
GLA Housing Design Guide Interim edition (2010)	The new 'interim edition' of the London Housing Design Guide sets out the Mayor of London's aspirations for the design of new housing in the capital. The Mayor is committed not just to delivering more homes in London, but also to improving the quality of our homes. The London Development Agency has published the new London Housing Design Guide, which sets a new benchmark for housing design in London. All housing built on London Development Agency land is expected to meet these standards. The standards will also start to be applied to housing schemes applying for funding from the London Homes and Communities Agency from April 2011.
South East London Housing Market Assessment (2014) and sub reports	Cobweb were commissioned by local authorities in South East London to undertake a Strategic Housing Market Assessment (SHMA) for the sub region. The local authorities involved in the project are Bexley, Bromley, Greenwich, Lewisham and Southwark. A SHMA is a framework that local authorities and regional bodies can follow to develop a good understanding of how housing markets operate.
The Private Rented sector in South East London and Lambeth (2014)	<p>The aim of the research was threefold:</p> <ul style="list-style-type: none"> <li>• To complement the South East London Strategic Housing Market Assessment (SHMA) that had been undertaken recently, by providing evidence and analysis of the PRS that would not be available or achievable through the 'desk top' SHMA.</li> <li>• To provide some of the evidence base that boroughs will need to draw on if considering introduction of licensing in the PRS.</li> <li>• To enable boroughs to better target interventions in the PRS, in terms of both enforcement and procurement (e.g. for use as temporary accommodation or for the prevention of homelessness).</li> </ul>

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The role of the planning system in delivering housing choices for older Londoners (2012)	This study is a 'think piece' to look specifically at the role of the planning system in helping to ensure that older Londoners have a choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in high quality environments. A policy for older Londoners will be a key input to a wider policy development process across London. The research set out to provide estimates of the future demand for and supply of specialist housing for older Londoners and to identify the challenges and potential barriers to delivery. Methods included modelling supply and demand, analysis of borough policies and practice and an extensive review of existing research.
GLA 2013 Round Population Projections	Detailed ward level population projections to support the London Plan. Incorporating housing provision targets as outlined in the consultations draft of the revised London Plan
Barriers to Housing Delivery (Update 2014)	In 2012 The GLA asked Moliar London to produce a report called 'Barriers to Housing Delivery in London'. The report's purpose, broadly, was to find out why developers in London were not building more homes for private-sale. The report's conclusion was, broadly, 'they are building more homes for private sale than you think'. Moliar London was asked to update that report. This time the brief might be simplified as 'the stock of unbuilt private-sector planning permissions in London is significant –so why aren't we hitting housing delivery targets?'. This report's conclusion can be summarised as 'big schemes in London are commencing units in line with the numbers required to meet housing need'.
London Student Housing Requirements Study (2007)	BBP Regeneration, SQW Ltd., Tribal Consulting, and Opinion Research Services undertook a study in 2006 to assess the impact that growth in the Higher Education (HE) sector may have on housing requirements and housing markets in Greater London. The primary aim of this research was to inform the implementation of London Plan and borough policy. The study incorporates a policy review, an analysis of baseline data on London's student population and student accommodation, and primary research. The data has been used to help forecast future student population growth and accommodation needs and the potential impact of the HE sector on London's economy, followed by a number of recommendations.
<i>Mayor's Academic Forum Recommendations Paper – student housing (2014)</i>	<p>The Mayor's Academic Forum was established through the 2011 London Plan particularly to support implementation of Policy 3.8 Bh, which recognises that specialist student provision could give rise to concerns over:</p> <ul style="list-style-type: none"> <li>• the loss of capacity for conventional homes, especially affordable family housing;</li> <li>• the need to secure mixed and balanced communities;</li> <li>• the scope for identifying land suitable for student accommodation; and,</li> <li>• the way these issues are expressed in parts of inner London "<i>where almost three quarters of the capacity for new student accommodation is concentrated</i>".</li> </ul> <p>The <i>Mayor's Academic Forum Recommendations Paper – student housing</i> is the first report of the Mayor's Academic forum to the Mayor, focusing on strategic planning issues for student housing. Its main recommendations have been reflected in FALP paragraphs 3.52, 3.53a and 3.53b.</p>
<b>Infrastructure</b>	
Draft London Infrastructure Plan 2050 (2014)	The document sets out what infrastructure London requires. It is the first ever strategic attempt to set out London's infrastructure needs, how much it might cost and how we pay for our needs. The aim is to prepare for, and benefit further from, London's growth: bringing fresh thinking into the city's infrastructure needs now, in order to meet them more costs effectively in the long term.
MOPAC/MPS Estates Strategy 2013-16	Linked to the Police and Crime Plan is the new MOPAC/MPS Estates Strategy 2013-16, see below. Following consultation on local

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	policing and public access in January-March 2013, further work was undertaken to finalise plans for the wider police estate and the final version of this strategy is available below.
Central London Infrastructure Study (2009)	The study aims to provide a strategic understanding of the implications of growth for the whole of Central London, with an indication of how growth, and therefore demand for infrastructure, is distributed across the study area. This analysis allows Central London Forward to build a robust case for additional infrastructure investment for Central London to achieve sustainable growth up to 2026. In particular, as well as offering local authority level information and analysis, the report provides evidence of sub-regional issues and opportunities, encouraging joint solutions wherever appropriate. This study also identifies existing gaps and shortfalls in infrastructure provision.
Community Infrastructure Charging Schedule – Mayor of London (2012)	Sets out the level of charge that will apply to certain types of new development across London in order to deliver the Crossrail programme.
Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy – SPG (2013)	This SPG sets out guidance on implementation of London Plan policies on the funding of Crossrail, planning obligations and the Community Infrastructure Levy (CIL).
Draft Social Infrastructure SPG (2014)	<p>Social infrastructure includes a wide range of services and facilities, including health, education, community, cultural, play, recreation and sports facilities, faith, emergency facilities and many other local services and facilities that contribute to quality of life.</p> <p>The draft guidance;</p> <ul style="list-style-type: none"> <li>• Gives a range of information sources to evaluate need for social infrastructure at the strategic planning level, starting with the GLA's own demographic projections and the ways in which these can be used to understand need for health, education and sports facilities.</li> <li>• Emphasises the need for planning across services to ensure the efficient and timely delivery of social infrastructure in a way the meets the broader built environment aims of the London Plan.</li> <li>• Describes Department of Health models for service delivery in a way that should help planners and health professionals to communicate with each other.</li> <li>• Sets specific targets for the provision of burial space based upon projections of need and survey of existing capacity set out in the 2011 Audit of London Burial Provision.</li> <li>• Provides a comprehensive range of resources for the assessment of social infrastructure need arising from individual applications.</li> </ul>
<b>London Plan</b>	
Further Alterations to the London Plan (2015)	
London Plan early minor alterations and revisions (2011-12)	The Mayor of London adopted the new London Plan in July 2011. Within the adopted London Plan, it was acknowledged that the Mayor would be consulting on early minor alterations to some of the policies. Following the adoption of the National Planning Policy Framework (NPPF), the Mayor has revised the alterations further and has commenced a third stage of consultation. The latest alterations incorporate the previous set of early minor alterations issued for consultation in February 2012 and include additional minor updates and amendments to take account of the NPPF and other legislation such as the duty to cooperate and the new CIL regulations.

Plan, Strategy or Programme	Summary of objectives and targets
London Plan (July 2011)	The London Plan describes an integrated economic, social, environmental and transport framework for the development of London over the next 20-25 years. London boroughs' local plans need to work within this larger structure and its policies guide decisions on planning applications by councils and the Mayor. The new London Plan policies deal with:
London Implementation Plan (2013)	<p>The Implementation Plan is intended to:</p> <ul style="list-style-type: none"> <li>• facilitate effective coordination and cooperation of activities to ensure the realisation of the London Plan</li> <li>• inform developers and all delivery partners who need to understand the envisaged implementation actions and strategic infrastructure provision in relation to the London Plan</li> <li>• provide communities with transparent and accessible information to enable them to get involved in the development of their area</li> <li>• help boroughs in terms of the wider context for their local implementation and infrastructure planning and the preparation for their Community Infrastructure Levy (CIL).</li> </ul> <p>The Plan will be updated regularly.</p>
London Planning Statement (2014)	<p>The NPPF revoked Government Office for London Circular 1/2008 which “provided advice and guidance on the arrangements for strategic planning in London”. The Mayor considers that it is helpful for him to fill the gap this leaves with a document that provides some information about his planning functions, and the way in which he intends to carry them out. This document is intended to be helpful to anyone concerned with planning in London, including boroughs, specialist agencies, developers, amenity and voluntary groups, individual neighbourhoods and Londoners. It:</p> <ul style="list-style-type: none"> <li>• sets out some general principles of fundamental importance to the planning system in London;</li> <li>• explains the Mayor’s part in London’s planning system, both in preparing strategic planning policy through his spatial development strategy (or “London Plan”) and in the taking of planning decisions about strategic developments;</li> <li>• highlights the issues that the Mayor considers are particular priorities for the London planning system and which he thinks it is helpful to draw to the attention of others; and</li> <li>• sets out the Mayor’s intended programme of planning-related work for the next four years.</li> </ul>
<b>Noise</b>	
London Agglomeration Noise Action Plan (2010)	The purpose of the Noise Action Plan is to assist in the management of environmental noise and its effects, including noise reduction if necessary, in the context of government policy on sustainable development. Noise Action Plans are based on the results of the strategic noise maps published in 2008.
Sunder City: The Mayor’s Ambient Noise Strategy (2004)	<p>The aim of the Mayor’s ambient noise strategy is a practical one – to minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practices and technology within a sustainable development framework.</p> <p>Three key issues are:</p> <ol style="list-style-type: none"> <li>1. Securing good noise reducing road surfaces</li> <li>2. Securing a night aircraft ban across London</li> <li>3. Reducing noise through better planning and design of new housing</li> </ol>
<b>Open Space, Biodiversity, Geodiversity</b>	

Plan, Strategy or Programme	Summary of objectives and targets
A Manifesto for Public Open Space: London's Great Outdoors (2009)	London's Great Outdoors recognises that investment in public space enhances the look and feel of the city, making it a more healthy and pleasant place for residents and visitors and an environment in which businesses can thrive. It contributes to maintaining and improving London's image as the world's most green and liveable big city and highlights London's offer as a city that can sustain economic growth.
Open Spaces Strategies: Best Practice Guidance (2008)	This document provides guidance on how to create an open space strategy. Drawing on the lessons learnt from 5 years of CABA Space strategic enabling support with local authorities across England, it updates earlier CABA Space guidance, ( <i>Green space strategies: A good practice guide</i> , 2004), and combines this with an update of the guidance for London, ( <i>Mayor's guide to preparing open space strategies; Best practice guidance of the London Plan</i> , 2004), to provide one comprehensive guide for England.
Connecting with London's Nature. The Mayor's Biodiversity Strategy (2002)	The document details the Mayor's vision for protecting and conserving London's natural open spaces. It seeks to ensure that there is no overall loss of wildlife habitats in London, and that open spaces are created and made accessible, so that all Londoners are within walking distance of a quality natural space. The strategy is an important step in establishing a London-wide framework for maintaining London's diversity of wildlife.
Environment Agency Greenroof Toolkit	<p>Environment Agency on-line toolkit which sets out guidance for site specific opportunities, green roof design and technical assessment. The vision is that developers will promote the use of green roofs to:</p> <ul style="list-style-type: none"> <li>• create a better and more sustainable London</li> <li>• deliver better quality places to live and work</li> <li>• create a low-carbon city</li> <li>• adapt to and mitigate the effects of climate change</li> </ul>
Forestry Commission – The case for trees (2010)	This document aims to inspire people involved in planning policy and practice to become champions and advocates for trees.
Preparing Borough Tree and Woodland Strategies SPG (2013)	<p>The Preparing Borough Tree and Woodland Strategies Supplementary Planning Guidance, a joint publication with the Forestry Commission, has been published. It sets out an approach to trees and woodland that:</p> <ul style="list-style-type: none"> <li>• Covers the audit, protection and management of trees and woodland in line with Policy 7.21 of the London Plan</li> <li>• Highlights the asset value of trees and woodland, both in financial terms and the broad range of economic and environmental benefits they provide</li> <li>• Considers all the trees in a borough as a single unified resource – an 'urban forest'</li> <li>• Extends the concept of an 'urban forest' across boundaries so that the cumulative benefits of trees to Londoners can be enhanced</li> <li>• Takes a step by step approach to the management of trees and woodland.</li> </ul>
All London Green Grid SPG 2012	The SPG aims to promote the concept of green infrastructure, and increase its delivery by boroughs, developers, and communities, by describing and advocating an approach to the design and management of green and open spaces to deliver hitherto unrealised benefits. These benefits include sustainable travel, flood management, healthy living, and creating distinctive destinations; and the economic and social uplift these support.

Plan, Strategy or Programme	Summary of objectives and targets
Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)	This SPG aims to help those involved in planning local neighbourhoods to engage with young Londoners to deliver real improvements in the quality of play spaces. The Mayor wants to see a child-friendly London with inclusive, accessible, and safe play spaces that allow all young Londoners to engage in fun, positive, and healthy play and recreation in their own communities and throughout London. The 2012 SPG adds further guidance to the previous 2008 SPG, in particular expanding on the concept of lifetime neighbourhoods.
London's Foundations SPG (2012)	<p>London's Foundations (2009) was a joint publication with Natural England setting out London's geological heritage, explaining the process for identifying sites of national, regional and local geological importance, identifying important geological sites for protection and advising boroughs on how to promote as well as protect geodiversity. It has been updated to reflect:</p> <ul style="list-style-type: none"> <li>• The publication of the 2011 London Plan;</li> <li>• The emerging advice of the Government in its National Planning Policy Framework;</li> <li>• The ongoing work of the London Geodiversity Partnership (LGP) in updating the number of sites that should be promoted/protected by boroughs via their development plan documents;</li> <li>• The publication by the LGP of their Geodiversity Action Plan.</li> </ul>
<b>Sustainability</b>	
Sustainable Design and Construction. Mayor's Supplementary Planning Guidance (2014)	This SPG provides guidance on what measures developers can include in their building designs and operations to achieve the carbon dioxide and water consumption targets set out in the London Plan. It also provides guidance on how boroughs can take forward the new approaches set out in the London Plan, such as carbon-dioxide off-setting, retrofitting and 'air quality neutral'.
Adapting to Climate Change: A checklist for development (2005)	This guidance on designing developments in a changing climate was published by the Greater London Authority. The main actions are summarised in a simple to use checklist, however, it is not intended to be a design manual, although it does contain signposts to more detailed guidance.
Sustainable Development Framework for London. London Sustainable Development Commission (June 2003)	<p>This Framework has been developed by the London Sustainable Development Commission, appointed by the Mayor in May 2002 to advise on sustainability issues in the capital. It is the first Sustainable Development Framework for London. It sets out a Vision for the capital and a set of objectives to guide decision making.</p> <p>The Framework should be used to:</p> <ul style="list-style-type: none"> <li>-provide the context for policy development and decision-making;</li> <li>-undertake sustainability appraisals of projects, plans and strategies;</li> <li>-monitor progress towards a more sustainable city</li> </ul>
Sustainable Communities Plan for London: Building for the Future (2003)	This document is part of a national programme of action setting out how the Government intends to achieve sustainable communities in London. The main challenges for London are to accommodate growth and to reduce poverty and deprivation. To do this, the main aims are for more and better-designed and affordable homes, including homes for key workers. To improve public transport and other infrastructure to support the development of new and growing communities; to raise education standards and skill levels across the capital; to tackle crime, anti-social behaviour and the fear of crime.
<b>Transport</b>	
Mayor's Transport Strategy (2010)	The Mayor's Transport Strategy is a statutory document, developed alongside the London Plan and Economic Development Strategy as

Plan, Strategy or Programme	Summary of objectives and targets
	<p>part of a strategic policy framework to support and shape the economic and social development of London over the next 20 years. It sets out the Mayor's transport vision and describes how Transport for London (TfL) and its partners, including the London boroughs, will deliver that vision. Six goals set out how the overarching vision should be implemented. The transport strategy should:</p> <ul style="list-style-type: none"> <li>• Support economic development and population growth</li> <li>• Enhance the quality of life for all Londoners</li> <li>• Improve the safety and security of all Londoners</li> <li>• Improve transport opportunities for all Londoners</li> <li>• Reduce transport's contribution to climate change and improve its resilience</li> <li>• Support delivery of the London 2012 Olympic and Paralympic Games and its legacy</li> </ul>
Land for Industry and Transport SPG (2012)	The SPG provides an update of previous Mayoral guidance, setting out how boroughs should make effective, efficient use of land for transport purposes.
River Action Plan (2013)	
Cycling Revolution London (2010)	The Strategy sets out the vision and policies for encouraging and enabling more cycling across London. The strategy sets out an aspiration to increase cycling by 400% by 2026 through a range of initiatives including the delivery of a series of cycle superhighways, improved cycle safety and an increase training aimed at cyclists
The Mayor's Vision for Cycling	<p>The Mayor's Vision for Cycling document sets out how this will be achieved, focusing on four key outcomes:</p> <ol style="list-style-type: none"> <li>1. <b>A Tube network for the bike.</b> London will have a network of direct, joined-up cycle tracks, with many running in parallel with key Underground, rail and bus routes.</li> <li>2. <b>Safer streets for the bike.</b> Spending on the Better Junctions programme will be significantly increased and substantial improvements to the worst junctions will be prioritised. With government help, a range of radical measures will improve the safety of cyclists around large vehicles.</li> <li>3. <b>More people travelling by bike.</b> We will 'normalise' cycling, making it something anyone feels comfortable doing.</li> <li>4. <b>Better places for everyone.</b> The new bike routes are a step towards the Mayor's vision of a 'village in the city', with more trees, more space for pedestrians and less traffic.</li> </ol>
An Electric Vehicle Delivery Plan for London	The EV Delivery Plan sets out a comprehensive strategy to stimulate the market for electric vehicles in London.
Your Accessible Transport Network (2014)	
<b>Waste</b>	
London's Wasted Resource: The Mayor's Municipal Waste Management Strategy	London's Wasted Resource sets out the Mayor's policies and proposals for reducing the amount of municipal waste produced, increasing the amount of waste reused, recycled or composted, and generating low carbon energy from waste remaining. This strategy also sets out how the Mayor, through the London Waste and Recycling Board, will help develop more waste management infrastructure in London.
Making Business Sense of Waste: The Mayor's Business Waste Management Strategy	Making Business Sense of Waste is the first Mayoral strategy for London's business waste. It sets out initiatives to help all kinds of London's businesses, from shops, restaurants, office buildings, manufacturers to construction companies to save money and reduce harm to the environment through better waste management.

Plan, Strategy or Programme	Summary of objectives and targets
London Waste Apportionment Study (2007) – update and further sensitivity testing	Subsequent to the reiteration of the apportionment, published in December 2006, further data of relevance to criteria within the model has become available. The update includes <ul style="list-style-type: none"> <li>• correct data on safeguarded wharves,</li> <li>• revision of current licensed waste management capacity in London resulting from the decision on the development of the Belvedere facility, updated, recently verified and soon to be published data on indicative capacity of land for waste, logistics and other industrial used in London, provided by the GLA.</li> </ul>
London Waste Apportionment Study (2006)	This report describes in detail the waste apportionment methodology underlying the London Plan minor alteration on borough level waste apportionment.
London Remade Demolition Protocol Report (2005)	This describes how demolition recyclate can be recovered with maximum value and how this can be provided as a high quality recycled material in new builds.
<b>Water</b>	
Securing London's Water Future (2011)	The draft London Water Strategy is intended to complement the plans and strategies of other organisations by presenting a London-specific view of managing water resources. At a time of decreasing supply and increasing demand for water we need to use the water we have more wisely. The strategy promotes increasing water efficiency and reducing water wastage to balance supply and demand for water, safeguard the environment and help tackle water affordability problems. It also sets out how the Mayor will help communities at risk of flooding to increase their resilience to flooding
Environment Agency Thames Estuary 2100 plan	This document provides regional guidance on the predicted effects of climate change in relation to tidal flood risk
Thames River Basin Management Plan (2009)	The EU Water Framework Directive requires the Environment Agency to prepare and publish 10 River Basin Management Plans (RBMP) by 2009 to promote the concept of sustainable water management. Their aims are: <ul style="list-style-type: none"> <li>• To safeguard the sustainable use of water</li> <li>• To protect and restore the status of aquatic ecosystems</li> <li>• To improve aquatic environments by the reduction of hazardous substances</li> <li>• To reduce groundwater pollution; and</li> <li>• To help mitigate the effects of flood and droughts</li> </ul>
Taking Care of Water- Our Plan for the next 25 years (Thames Water Utilities ) 2015-2040	Taking care of water describes a long-term strategy to address a series of issues. It is built around the four main themes that have emerged from public consultation: delivering for customers; planning for a sustainable future; delivering efficiently; and providing affordable services. The document set out the things that are needed to meet the challenges of the future. It also set out the costs of providing those services and the likely impact on bills.
Water Resources Management Plan (Thames Water Utilities) 2015-2040.	Sets out how demand for water is balanced against the supply over the next 25-year period.

Plan, Strategy or Programme	Summary of objectives and targets
Our Plans for Water (Thames Water Utilities) 2015-2020	A five-year Plan which sets out proposals to maintain and improve services during the period 2015 to 2020.
Drought Plan (2013) (Thames Water Utilities)	The Drought Plan sets out the actions to take in the event of a drought to maintain essential supplies of water while protecting the environment.
Draft Strategic Proposals for Sludge Management (Thames Water Utilities) 2008	Thames Water Utilities Ltd. (Thames Water) has developed high-level strategic proposals for sludge management/disposal in our region for the 25 years to 2035. The decision to carry out the strategy development was taken for the following reasons: (1) to provide a broad framework for the specific investment proposals, particularly in the period 2010-2015 for the periodic review of our charges in 2009, and (2) to review the appropriateness of the current strategy (i.e. wherever possible recycle sludge to land) going forward, given the increasing costs and regulatory/other constraints arising from this outlet.
Thames Corridor Catchment Abstraction Management Strategy (CAMS)	This guidance on designing developments in a changing climate was published by the Greater London Authority in November 2005. The main actions are summarised in a simple to use checklist, however, it is not intended to be a design manual, although it does contain signposts to more detailed guidance.

## LOCAL

Policy or Plan	Summary of objectives and targets
<b>Community</b>	
The Council Plan 2014/15 to 2017/18	The Council Plan is the council's overarching business plan. A Council Plan for 2014/15 to 2017/18 was agreed by Cabinet in July 2014. The council plan describes how we will deliver our fairer future vision through the promises and commitments that we have made to the people of Southwark. It also makes a number of commitments to equality and fairness in line with our approach to equality.
Sustainable Community Strategy 2006-16	The Community Strategy is prepared by Southwark Alliance (the local strategic partnership) and sets out a vision and priorities for the Borough from 2006 to 2016. The vision is 'the belief of making Southwark a better place to live, to learn, to work and have fun'. This was developed in consultation with the local community. The strategy seeks to improve life in Southwark by: tackling poverty, making Southwark cleaner and greener; cutting crime and fear of crime; raising standards in our schools; and improving the health of the borough.
Children and Young People's Plan 2013-2016	This strategy provides a plan for all local services affecting children and young people in Southwark. The aims in the next three years are: improved literacy and numeracy; more things to do; less crime against children and young people; fewer teenagers getting pregnant; and a reduction in the rate of increase of children who are obese.
Southwark Primary and Community Care Strategy 2013-2018	This plan describes Southwark Clinical Commissioning Group's intentions to build strong local services to meet the challenges of improving care over the next five years. It supports a range of our other plans and priorities as well as reflecting national policies and thinking on the best way to ensure that primary and community care services are fit for the future.
Southwark Statement of Community Involvement (2008)	The Statement of Community Involvement (SCI) sets out how and when Southwark Council involve the community in the alteration and development of town planning documents and applications for planning permission. This ensures there is effective community involvement in the planning process.
Safer Southwark Partnership Action Plan (2013-2015)	The Safer Southwark Partnership (SSP) has agreed minimum standards of service for responding to antisocial behaviour and for victims and witnesses of crime. These are a commitment to residents that the SSP will continue to keep Southwark a safe place to live, work and visit.
Southwark Violent Crime Strategy 2010/2015	The Southwark violent crime strategy 2010/15 detailing how the council, police and other partners in Southwark are tackling violent crime in the borough.
<b>Economy and Employment</b>	
Southwark Employment Land Review (2010)	The study provides an assessment of the quantity, quality and viability of employment land throughout the borough and evaluates the viability of existing (UDP) employment policies as well as informing the LDF evidence base and associated policies.
Harmsworth Quays non-residential uses study (2012)	The study explores the potential for non-residential uses that could be accommodated on Harmsworth Quays and the adjacent sites. The study makes recommendations on a strategy for business use (B1a and B1c) for the study site.; and explores the potential for other non-residential use, including educational use such as a university or college of higher education or leisure use.

Policy or Plan	Summary of objectives and targets
Southwark Economic Well-being Strategy 2012-2020	<p>Our new strategy sets out what we want to achieve between now and 2020, and how we aim to work across the Council and with our partners in the private, public and voluntary sectors in order to make Southwark a place:</p> <ul style="list-style-type: none"> <li>• Where people, especially our young people, are equipped with the skills and ambition to make the most of our central London location</li> <li>• Where businesses grow and prosper</li> <li>• Where town centres and high streets thrive</li> <li>• Where our residents are financially independent</li> </ul>
Southwark Industrial and Warehousing Land Study (2014)	Southwark Council commissioned GVA to undertake a review of industrial and warehousing land and premises in the borough. The study is an evidence base document and will inform the preparation of future planning policies, as well as a wider employment land review (a forecast of how much space will be needed to meet demand over the next 15 years or so) that will be carried out in 2014/15.
Culture Strategy 2013-2018 and action plan	We have developed a strategy to cover the period from 2013 to 2018 that uses our targeted support, partnership and leverage to enable the valuable cultural sector in Southwark to create, develop and grow. The key objectives are to generate opportunities, build local pride and deliver prosperity for the borough. The strategy is presented as a range of specific and measurable actions to be delivered over the next five years.
<b>Education</b>	
Primary Investment Strategy Cabinet Report 2014	This Cabinet Report sets out a series of recommendations for addressing need for additional primary school places in the borough
School places strategy update, Cabinet Report (2014)	This report sets out the forecast demand for primary and secondary places and the associated need for additional school places. It sets out the approach for meeting primary demand.
Southwark Extended Schools Strategy	<p>The strategy sets out a set out principles as the basis for the development of extended schools in Southwark.</p> <p>The strategy anticipates that providing extended services will</p> <ul style="list-style-type: none"> <li>• support improvements in standards</li> <li>• enable children to have fun and develop new skills</li> <li>• enhance support for vulnerable children</li> <li>• encourage parental involvement in children's learning</li> <li>• make better use of facilities by opening them up to the community</li> <li>• provide better help to address children's wider needs</li> </ul>
<b>Flood Risk</b>	
Southwark Strategic Flood Risk Assessment (SFRA) ( 2008)	A Strategic Flood Risk Assessment (SFRA) has been prepared to ensure that flood risk is taken into account and minimised in all new developments. The SFRA sets out the level of flood risk in different areas of the borough. This will help plan for new developments and assist in the determination of planning applications.

Policy or Plan	Summary of objectives and targets
Southwark Interim Preliminary Flood Risk Assessment 2011	This document forms a Preliminary Flood Risk Assessment (PFRA) report for the Southwark in accordance with the Flood Risk Regulations 2009. The PFRA provides a high level summary of significant flood risk, based on available and readily derivable information, describing both the probability and harmful consequences of past and future flooding. The scope of the PFRA is to consider flooding from the following sources; surface runoff, groundwater and ordinary watercourses and any interaction these may have with main rivers and the sea
<b>Health</b>	
Better Environment, Better Health (Southwark) (2013)	The Better Environment, Better Health guide offers tailored information on seven important environmental factors that can impact on residents' health. These factors are green spaces, active travel and transport, surface water flood risk, air quality, healthy food, fuel poverty and overheating. These guides are written for borough Health and Wellbeing Boards, Directors of Public Health, elected members, Regeneration and Planning Officers, Environmental Officers, Health Watch and Clinical Commissioning Groups (CCGs). The guides aim to influence local borough decisions and how budgets are decided and allocated. The hope is to encourage more collaborative work to reinforce London's resilience to changes in climate and improve Londoners' health.
Southwark Alcohol Needs Assessment (2011)	The Alcohol Needs Assessment quantifies the prevalence of alcohol related behaviours, the impact of alcohol on health in Southwark and assesses the services provided to reduce alcohol related harm.
Annual Public Health Report 2010	Life expectancy in Southwark has never been higher, with women in Southwark living to an average of 82.9 years, which is above the national average of 82.3 and men in Southwark living to an average of 77.8 years. However, every year up to 600 people die in Southwark before the age of 75. This year's Annual Public Health Report for Southwark focuses on how GP practices can work with their patients to prevent more early deaths. Southwark's early death rates from heart attack and chronic obstructive lung disease (covering emphysema and bronchitis) was significantly higher than the national average.
Children and Young People's Health Needs Assessment (2010)	A detailed analysis of the demand and performance of Southwark's services and how this contributed to the development of the Children and Young People's Plan 2010-2013.
NHS Southwark Strategic Plan 2010/2011 – 2014/2015	<p>This Strategic Plan sets out our plans over the next five years to deliver improvement in health outcomes and high quality and effective services for our population. The Strategic Plan sets out the PCT vision for improved health in Southwark and describes how we will work with our partners to achieve those goals.</p> <p>This plan outlines our work to prioritise initiatives and actions given a clear understanding of health need, the current provider landscape and steps the PCT will take to manage the market for provision to secure the standards required by commissioning intentions.</p>
Southwark Children and Young Peoples Health plan (2010)	<p>This plan sets out how we will improve the wellbeing of children and young people in regard to the five Every Child Matters outcomes:</p> <ul style="list-style-type: none"> <li>• Be healthy</li> <li>• Stay safe</li> <li>• Enjoy and achieve</li> <li>• Make a positive contribution</li> </ul>

Policy or Plan	Summary of objectives and targets
	<ul style="list-style-type: none"> <li>Achieve economic wellbeing</li> </ul> <p>This plan recognises and addresses the far-reaching implications of statutory changes to children's trusts, local safeguarding children boards, Children and Young People's Plans and the roles of lead members and directors of children's services, which came into force on 1 April 2010.</p>
Southwark Health Profile 2013	<p>This report contains a summary of health and wellbeing issues represented through available statistics obtained from reliable sources. This document forms a part of the suite of documents published as a part of the Joint Strategic Needs Assessment work programme. The document is intended to provide an understanding of the health and well-being of Southwark residents. The content of this report is meant to support the health and social care commissioners; along with other stakeholders in primary, secondary and community care including local voluntary sector agencies.</p>
Public Health Observatories: Southwark Health Profile (2014)	<p>This profile gives a picture of people's health in Southwark. It is designed to help local government and health services understand their community's needs, so that they can work to improve people's health and reduce health inequalities.</p>
Public Health Outcomes Framework: Southwark (2013)	<p>The Public Health Outcomes Framework 'Healthy lives, healthy people: Improving outcomes and supporting transparency' sets out a vision for public health, desired outcomes and the indicators that will help us understand how well public health is being improved and protected. The framework concentrates on two high-level outcomes to be achieved across the public health system, and groups further indicators into four 'domains' that cover the full spectrum of public health. The outcomes reflect a focus not only on how long people live, but on how well they live at all stages of life. This profile currently presents data for the first set of indicators at England and upper tier local authority levels, collated by Public Health England.</p> <p>The profile allows you to:</p> <ul style="list-style-type: none"> <li>-Compare your local authority against other authorities in the region</li> <li>-Benchmark your local authority against the England value</li> </ul>
Child Obesity Joint Review (2012)	<p>The child obesity joint review examines the high rate of childhood obesity in the borough and recommends a wide range of actions to counteract the increasing prevalence.</p>
Joint Health and Wellbeing Strategy 2013-14	<p>This strategy outlines how the council and its partners will work together to promote integration, improve outcomes and reduce health inequalities of Southwark's residents by focusing on three strategic objectives.</p>
Lambeth and Southwark: Emotional Wellbeing and Mental Health Needs Assessment 2013	<p>This needs assessment (NA) covers Lambeth and Southwark boroughs and was overseen by a stakeholders group. It aims to inform the commissioning strategies of the two boroughs and partner agencies.</p>
Supporting the Health of Young People in Southwark: A summary report of the Health Related Behaviour Survey 2014	<p>These results are the compilation of data collected from a sample of primary and secondary pupils aged 8 to 15 in Southwark during the summer term 2014. This work was commissioned by the Lambeth and Southwark Public Health team on behalf of the London Borough of Southwark as a way of collecting robust information about young people's lifestyles.</p>
Betting, borrowing and health: Health impacts of betting shops and payday loan shops in Southwark (2014)	<p>This report summarises evidence on the health impacts associated with the clustering of betting shops and payday loan shops in the context of Article 4 Directions. The objectives of this report are to: review existing evidence around health and wellbeing impacts; identify a range of local health indicators; and examine the spatial relationship between betting shops and pay-day loan shops and health indicators.</p>
Adult Social Care: Promoting independence, wellbeing and choice – Local Account 2012/2013	<p>The Local Account is a new form of public performance report, setting out the progress councils have made in delivering national and local adult social care priorities and the key areas where further improvement is required.</p>

Policy or Plan	Summary of objectives and targets
<b>Heritage, Design and Archaeology</b>	
Southwark Conservation Area Appraisals	The government requires all councils to produce appraisals for the conservation areas in their borough. Conservation area appraisals are intended to: Provide an analysis and account of the area; explain why it is considered to be of special architectural or historic interest; Give a clear indication of the council's approach to its preservation and enhancement. They are also used by the council in assessing the design of development proposals.
Southwark Archaeology Priority Zones	Southwark Council has policies to protect the borough's archaeology. The policy identifies seven archaeological priority zones (APZs). When development proposals are submitted for these areas, the archaeology officer conducts initial appraisals to assess the archaeological implications and ensures that any necessary investigations take place
Core Strategy: Policy 12 Tall building background paper, Southwark Council (2009)	Sets out the background and research that has informed the suitable locations for tall buildings as established in Policy 12 and supporting text contained within our core strategy. It summarises our evidence base, describes our strategy and our reasons for selecting the approach we have taken.
Core Strategy: Borough-wide Strategic Tall Building Study, Southwark Council (2009)	Sets out an overview of the character of Southwark to inform the evidence base which informs the production of Core Strategy Policy 12, particularly the tall building height policy.
Investing in Rotherhithes Public Realm (2007)	This study provides an audit of the public realm in Rotherhithe and provides a broad strategy for improving the public realm.
Canada Water AAP public realm improvements study (2009)	This study builds on the work of the 2007 Rotherhithe public realm study and identifies a number of projects which would significantly improve walking and cycling routes and public realm in the Canada Water action area. When funding becomes available to implement the improvements to the routes and public spaces identified in the study, further consultation will be carried out on the scope of works and design.
Canada Water town centre feasibility study, Benoy, (February 2010)	The town centre feasibility study explored options for developing the main sites in the town centre. It's main purpose was to consider how much development could be provided in the town centre in a manner that would be consistent with the principles set out in the Canada Water AAP.
Harmsworth Quays and adjacent sites masterplanning feasibility study, April 2013	The focus of this masterplanning study is Harmsworth Quays and the adjacent sites, Mulberry Business Park, Site F, Surrey Quays Leisure Park, and service yard of Surrey Quays Shopping centre.
Peckham and Nunhead Urban Design Study (2010)	This document sets out our analysis to inform our approach to urban design and building heights in the Peckham and Nunhead action area.
Guidance on Tall Buildings, July 2007, CABI & English Heritage	This document sets out how CABI and English Heritage evaluate proposals for tall buildings. It also offers advice on good practice in relation to tall buildings in the planning process.

Policy or Plan	Summary of objectives and targets
Heritage in local plans - how to create a sound plan under the NPPF, 2012, English Heritage	This is a guide to local authorities from English Heritage on how to achieve the objectives of the NPPF for the historic environment and thereby pass the test for a sound local plan.
Seeing The History In The View: A Method For Assessing Heritage Significance Within Views, June 2011, English Heritage	This document presents a method for understanding and assessing heritage significance within views.
<b>Housing – General</b>	
Southwark Affordable Housing Viability Study (2010)	This report examines in terms of financial viability, the potential for development sites in Southwark to deliver affordable housing at varying percentages and mixes, while maintaining other planning obligations at the current levels as advised.
Southwark Housing Requirements Study (and sub reports) 2010	The study was undertaken to inform local policies, in particular relating to the development plan and housing strategy surrounding affordable housing provision. The study provides a key component of the evidence base required to develop and support a robust policy framework.
Southwark Housing Strategy (2015)	<p>Southwark Council Cabinet agreed Southwark’s first long-term housing strategy in January 2015. The Southwark housing strategy to 2043 consists of four principles:</p> <ul style="list-style-type: none"> <li>• We will use every tool at our disposal to increase the supply of all kinds of homes across Southwark.</li> <li>• We will demand the highest standards of quality, making Southwark a place where you will not know whether you are visiting homes in private, housing association or council ownership.</li> <li>• We will support and encourage all residents to take pride and responsibility in their homes and local area.</li> <li>• We will help vulnerable individuals and families to meet their housing needs and live as independently as possible.</li> </ul>
Planning Committee report on Affordable Rent (2011)	This Planning Committee report clarifies the council's affordable housing policies, including the council's current approach in addressing the affordable rent tenure.
Affordable Rent in Southwark Study (2011)	This study looks at the affordability of affordable rent across the nine different postcode areas of Southwark. It models a range of scenarios from 40% to 80% market rents for one, two, three and four bedrooms dwellings. It shows that it will be very difficult for people in housing need to afford the affordable rent model, particularly family homes
Impact of the Affordable Rent tenure on the viability of developments in Southwark (2011)	This study looks at the viability of delivering affordable rent housing in Southwark. It considers the potential for development sites in Southwark to deliver affordable housing at varying percentages and mixes, while maintaining other planning obligations at the current levels as advised.
Southwark Commuted Sums Study 2011	This study looks at how much money could be secured as a pooled contribution in lieu of on-site affordable housing, if a scheme was 100% private housing rather than requiring affordable housing to be on site. It tests the amount of potential pooled contribution that could be viable by testing 35 sites across Southwark. It is part of the evidence base for the draft affordable housing supplementary planning document 2011.
<b>Housing – Student accommodation</b>	

Policy or Plan	Summary of objectives and targets
Research into the need for additional student housing in Southwark (2008)	London Borough of Southwark undertook research into the need for additional student housing in Southwark in 2008. The study was initiated to inform the comprehensive review of the Southwark Housing Strategy and to inform the preparation of the core strategy. It was produced at the time when the borough was beginning to experience an increasing number of planning applications from developers wishing to build accommodation for students in Southwark. The objective of this study is to report provide consolidated information on: Existing student accommodation in the Borough; the schemes of student housing currently in the pipeline with planning consent to include those under construction and those not yet started; and the student housing schemes with current applications.
Student Implementation Study (2011)	This study looks at how strategic policy 8 of the core strategy on requiring affordable housing within student homes could be implemented. It looks at ways in which the policy can be implemented as well as testing the viability of the policy. It is part of the evidence base for the draft affordable housing supplementary planning document 2011.
<b>Neighbouring boroughs:</b>	
<p>Lewisham Council Sustainable Community Strategy (2008-2020)</p> <p>Our vision 2020: Lambeth Community Strategy (2008-2020)</p> <p>Croydon community Strategy 2010-2015</p> <p>The City Together Strategy: the Heart of a World Class City 2008-2014</p> <p>Tower Hamlets Community Plan (2011)</p> <p>Building a better Bromley 2020 (2009)</p> <p>Westminster City Plan (2006-2016)</p>	<p>Every London Borough has a Sustainable Community Strategy that is prepared by the Local Strategic Partnership. Broadly, the role of the strategy is to establish a vision for the how the borough should change over a set period for the benefit of the local community. The strategies are cross-cutting in terms of the themes covered and each is tailored to the key issues in each of the boroughs in question. Subsequent strategies, including Local Plans and other planning documents, should be linked to achieving this vision and where appropriate delivering specific objectives. The sustainable communities strategies for our neighbouring boroughs set the context for much of the partnership working that that we undertake with each other.</p>
<p>Lambeth Core Strategy (2011) and Draft Local Plan (2015)</p> <p>Lewisham Core Strategy (2011)</p> <p>Bromley saved UDP (2006) and emerging Local Plan (2014)</p> <p>The City of London Local Plan (2015)</p> <p>Tower Hamlets Core Strategy (2010)</p> <p>Croydon Strategic Policies</p>	<p>The Core Strategies and Local Plans of each of the London Boroughs contain their vision for future development, usually over a 10 or 15 year period. They set out the spatial planning policies that establish guidance around strategic issues such as the distribution of housing, delivery of new jobs and economic growth, transport and connectivity, the environment and sustainability and the delivery of new infrastructure. Importantly, the Core Strategies of the various London Boroughs will set out planning issues that could potentially have an impact across administrative boundaries. Where a core strategy has not yet been adopted, the Unitary Development Plan forms the basis of the Local Plan for those boroughs.</p>

Policy or Plan	Summary of objectives and targets
Westminster City Plan: Strategic Policies (2013) and saved UDP (2010)	
<b>Open Spaces and Biodiversity</b>	
Southwark Open Space Strategy (2013) and evidence base (2013)	This report provides the evidence base setting out the current position with regard to the provision of open spaces in Southwark, This includes an updated audit of all the existing protected open spaces. The strategy sets out a number of recommendation on improving the quality of the existing open spaces and makes site specific recommendations for the different sub-areas of the borough.
Southwark Physical Activity and Sport Strategy 2014-2017	This study sets out what the council and PRO-ACTIVE Southwark partners will deliver to support more people becoming more active more often.
Southwark Biodiversity Action Plan (2013-2019) and evidence base	A new Biodiversity Action Plan (BAP) has been developed and is in the process of being adopted by the Council. The BAP has been developed by the Southwark Biodiversity Partnership in accordance with national, regional and local legislation and policies. The plans will run from 2012 to 2018. This plan provides information and guidance on protecting, managing and promoting key wildlife habitats and species within London.
Southwark Tree Management Strategy (2011)	A tree management strategy is a policy framework for the trees owned, managed and/or protected by an organisation. Southwark Council's tree management strategy sets out a vision for the next five years and explains how we will achieve this vision. It is a reference document for anyone with an interest in Southwark's trees.
<b>Planning</b>	
Southwark Core Strategy (2011)	The Core Strategy is a planning document that sets out how Southwark will change up to 2026 to be the type of place set out in our Sustainable Community Strategy (Southwark 2016). It affects everyone living, working and visiting Southwark. The core strategy sets out our long term vision, spatial strategy and strategic policies with an implementation plan up until 2026 to deliver sustainable development.
Southwark Plan Saved Policies (2010)	The Southwark Plan policies are saved where they are consistent with the core strategy.
Area Action Plans	<p>An Area Action Plan (AAP) is a development plan document focused upon a specific location or area subject to conservation or significant change. This could include a major regeneration project or growth area. It ensures development of an appropriate scale, mix and quality for key areas of opportunity, change or conservation. AAPs are subject to independent examination.</p> <p>Peckham and Nunhead Area Action Plan (2014)</p> <p>Aylesbury Area Action Plan (2010)</p> <p>Canada Water Area Action Plan (2012)</p>
Southwark Plan Adopted Policies Map (updated March 2012)	<p>The adopted proposals map is part of Southwark's Local Plan and shows the proposals and policies for the following adopted plans which are used to make decisions on planning applications:</p> <ul style="list-style-type: none"> <li>• Southwark Plan (Southwark Unitary Development Plan) adopted July 2007</li> </ul>

Policy or Plan	Summary of objectives and targets
	<ul style="list-style-type: none"> <li>• Aylesbury Area Action Plan</li> <li>• Canada Water Area Action Plan March 2011</li> </ul> <p>The adopted proposals map is updated each time a new Development Plan Document in the LDF is adopted.</p>
Southwark adopted Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPGs)	Supplementary planning documents (SPDs) and supplementary guidance documents (SPGs) are used to provide more information and guidance on the policies in the development plan. They can be based on certain topics such as transport or design, or they can be specific to certain places such as Dulwich. Southwark has several SPDs and SPGs which provide additional information on the saved policies in the Southwark Plan (UDP) and Core Strategy.
Southwark Annual Monitoring Reports (2004-2011)	<p>The AMR assesses if our planning policies achieve their objectives and targets by using a collection of data from local, regional and national sources and a number of indicators that measure performance.</p> <p>The AMR sets out:</p> <ul style="list-style-type: none"> <li>• progress in producing planning documents</li> <li>• whether planning policies are achieving the objectives of the plan</li> <li>• what impacts the policies are having on the local environment, communities and economy</li> <li>• details of how policies need to be changed or replaced if we are not meeting our objectives or targets</li> </ul>
<b>Pollution</b>	
Air Quality Management and Improvement Plan (2012)	This document will help deliver the National Air Quality Strategy for Air Quality Management Areas (AQMA).
Southwark Contaminated Land Strategy (2001)	This document establishes a programme to identify contaminated land and water in Southwark, and to facilitate its remediation according to UK National Regulations.
<b>Town Centres</b>	
Southwark Retail Capacity Study (2009)	<p>The study considers:</p> <ul style="list-style-type: none"> <li>• The vitality and viability of Southwark's existing town centres</li> <li>• The extent to which Southwark centres are fulfilling their role in meeting the retailing needs of the borough</li> <li>• The need for further retail development during the LDF period, and possible scenarios for meeting any identified need for additional retail floorspace</li> </ul>
Southwark Street Trading and Markets Strategy (2010)	The street trading and markets strategy sets out how we want to work with traders to revitalise markets in the borough. The strategy aims to set out what we will do to: increase numbers of people using and trading on our markets; keep markets thriving and viable business environments; improve the management of markets and market areas.
Town Centre retail surveys (2014)	This survey explore the health of 5 town centres in the borough and in particular the impact of Betting and Payday Loan shops on the

Policy or Plan	Summary of objectives and targets
	environment and offer in these town centres.
<b>Sustainability</b>	
Environment Agency summary for Southwark (2011)	This report provides a snapshot of the environment in Southwark. It outlines trends and changes in the environment, and highlights some of the work being carried out in the local areas to improve the environment, and people's experience of it. The report has been compiled as an extension of the London State of the Environment report to provide a local focus on the Boroughs and the health of their environment.
Canada Water AAP energy study (2009)	This study will help to identify appropriate policies and targets which promote energy efficiency and energy generation from decentralised, low carbon and renewable energy technologies.
Southwark Energy and Carbon Reduction Strategy (2011)	The Energy and Carbon Reduction Strategy summarises the current situation with regard to carbon emissions in Southwark and sets out a series of recommendations as to how the council can reduce its own emissions
Peckham and Nunhead energy study (2012)	This report provides the evidence to support the policies proposed in the Peckham and Nunhead AAP and reinforce those within the Core Strategy to reduce energy consumption and CO2 emissions. It also identifies specific projects to reduce CO2 emissions that the Council could seek to deliver or support.
<b>Transport</b>	
Southwark Transport Plan (2011)	The new Transport Plan for Southwark replaces the Local Implementation Plan. The Transport Plan sets out how we will improve travel to, within and from the borough. It also sets out our long term goals and transport objectives for the borough (up to 20 years), a three year programme of investment, and the targets and outcomes we are seeking to achieve. The Southwark Transport Plan responds to the revised Mayor's Transport Strategy (MTS), the emerging Sub-Regional Transport Plans (SRTPs), Southwark's Sustainable Community Strategy and other relevant policies.
Peckham Town Centre parking and delivery review study (2010)	The study reviews car parking provision and the impact of deliveries in and around Peckham town centre. It also identifies opportunities to create a more efficient approach to providing and managing car parking and servicing of businesses in Peckham.
Southwark Development Impact Report (Canada Water) (2010)	The objective of the study was to identify both short and long-term transport impacts on the Canada Water regeneration area within Rotherhithe during multiple peak travel periods. Developments in the local and adjacent areas as well as major transport proposals in the related vicinity were assessed.
Draft Southwark Cycling Strategy (2015)	A strategy setting out objectives to work together in partnership with our neighbouring boroughs, TFL, the police, businesses, organisations and agencies, schools and local community groups and residents to further develop the local cycling economy, invest in cycle friendly infrastructure, promote a cycling culture and ensuring new developments are future proofed for cycling.
<b>Waste</b>	
Southwark Waste Management Strategy: 2003 – 2021	This sets out Southwark council's programme for achieving the waste management targets set out in the GLA Waste Management Strategy.
<b>Infrastructure and Viability</b>	

Policy or Plan	Summary of objectives and targets
Southwark Community Infrastructure Levy (Revised Draft CIL Charging Schedule Dec 2014)	The Community Infrastructure Levy (CIL) is a new levy that local authorities can choose to charge on new developments in their area. CIL is a mandatory charge levied on most new developments that involve an increase of 100sqm or more of net additional internal floorspace or development that involves the creation of a new residential unit or more. The money can be used to support development by funding infrastructure that the council, local community and neighbourhoods need.
Southwark Infrastructure Plan	The Infrastructure Plan identifies strategic infrastructure which is needed to support growth and development in the borough over the lifetime of Southwark's Core Strategy (2011-2026). It is a "living document" which will be updated regularly as further details about infrastructure requirement to support growth become clearer.
Canada Water financial viability analysis (2010)	This study assesses the financial viability and deliverability of the Canada Water area action plan (AAP) proposals drawn by Benoy (architects and masterplanners) for the redevelopment of Canada Water town centre.
St Georges Wharf Study (2010)	The St George's Wharf feasibility study informs the allocation of the site in the Canada Water AAP. This study provides a financial appraisal of the preferred options for the site.
Harmsworth Quays and the adjacent sites viability analysis, February 2013	Montagu Evans has conducted a high level viability assessment of the indicative masterplan for Harmsworth Quays and surrounding land. The appraisals are based on a high level masterplan prepared by Hawkins Brown, together with indicative costs prepared by Gardiner & Theobald.
Harmsworth Quays and the adjacent sites further viability testing, November 2013	This report includes further viability and scenario testing in respect of Harmsworth Quays and surrounding land at Canada Water. The key objectives of this study are to examine certain elements of the scheme in terms of its capacity to support affordable housing – and in the context of the Council's proposed draft Community Infrastructure Levy.
CIL Viability Further Sensitivity Testing, BNP Paribas, November 2013	This report includes further sensitivity testing to support the proposed Community Infrastructure Levy ('CIL') Revised Draft Charging Schedule.
CIL Viability Study (2014)	This report tests the ability of a range of developments throughout the London Borough of Southwark to yield contributions to infrastructure requirements through the Community Infrastructure Levy ('CIL'). Levels of CIL have been tested in combination with the Council's other planning requirements, including the provision of affordable housing.
Cemetery Strategy (2012)	This Cemetery Strategy seeks to address the chronic shortage of burial space in the borough. The Strategy focuses on practical options for burial within the current cemetery areas within Southwark but also takes account of potential options for burial outside of those areas.
Metropolitan Police Estate – Asset Management Plan (2007)	<p>This document sets out the strategy for improving the Metropolitan Police Estate in Southwark over the next three years. The future estate will be based around the following five operational policing themes:</p> <ul style="list-style-type: none"> <li>• Safer Neighbourhoods bases</li> <li>• Custody Centres</li> <li>• Patrol Bases</li> <li>• Front Counters</li> <li>• Office accommodation</li> </ul>

Policy or Plan	Summary of objectives and targets
MPA Estate Strategy 2010/14	This Estate Strategy sets out our vision for the estate in supporting the delivery of an effective policing service to London in a way that increases public confidence and safety.

## APPENDIX 2

### QUALITY ASSURANCE CHECKLIST

The NSP falls within the definition of a 'plan or programme' under European Directive 2001/42 (the SEA Directive). As it is likely to have significant environmental effects, it must also undergo a Strategic Environmental Assessment (SEA), as part of the sustainability appraisal. The SEA directive is transposed (made) into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004. Guidance on the implementation of the 2004 Regulations and the Planning and Compulsory Purchase Act is set out in the ODPM's Practical Guide to the Strategic Environmental Assessment Directive (September 2005). The government guidance on SA incorporates the requirements of the SEA Directive within the SA process. In the case of the NSP, all reference to SA should be understood as referring to both the SA and SEA process.

To ensure that the requirements of Strategic Environmental Assessments (as required by European Directive EC/2001/42) are adhered to, the following quality assurance checklist has been completed. It identifies where in the IIA process the requirements of SEA will be undertaken. The checklist appears in the Practical Guide to the Strategic Environmental Assessment Directive (September 2005, ODPM) and has been adapted for the purposes of this IIA.

<b>Objectives and context</b>	<b>IIA reference</b>
The plan's or programme's purpose and objectives are made clear.	Expected in the Preferred Options and Proposed Submission IIAs
Environmental issues and constraints, including international and EC environmental protection objectives, are considered in developing objectives and targets.	Section 4 and 5 of this Scoping Report
SEA objectives, where used, are clearly set out and linked to indicators and targets where appropriate.	Section 5 of this Scoping Report
Links with other related plans, programmes and policies are identified and explained.	Section 2 and Appendix 1 of this Scoping Report
Conflicts that exist between SEA objectives, between SEA and plan objectives and between SEA objectives and other plan objectives are identified and described.	Section 5 of this Scoping Report and expected in the Preferred Options and Proposed Submission IIAs
<b>Scoping</b>	<b>IIA reference</b>
Consultation Bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Environmental Report.	Section 1 of this Scoping Report
The assessment focuses on significant issues.	Section 4 of this Scoping Report
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	Expected in the Preferred Options and Proposed Submission IIAs if appropriate
Reasons are given for eliminating issues from further consideration.	Expected in the Preferred Options and Proposed

	Submission IIAs if appropriate
<b>Alternatives</b>	<b>IIA reference</b>
Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.	Expected in the Preferred Options and Proposed Submission IIAs
Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant.	Expected in the Preferred Options and Proposed Submission IIAs
The environmental effects (both adverse and beneficial) of each alternative are identified and compared.	Expected in the Preferred Options and Proposed Submission IIAs
Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.	Expected in the Preferred Options and Proposed Submission IIAs if appropriate
Reasons are given for selection or elimination of alternatives.	Expected in the Preferred Options and Proposed Submission IIAs if appropriate
<b>Baseline information</b>	<b>IIA reference</b>
Relevant aspects of the current state of the environment and their likely evolution without the plan or programme are described.	Section 3 of this Scoping Report
Environmental characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan.	Section 3 of this Scoping Report
Difficulties such as deficiencies in information or methods are explained.	Section 1 of this Scoping Report
<b>Prediction and evaluation of likely significant environmental effects</b>	<b>IIA reference</b>
Likely significant social, environmental and economic effects are identified, including the types listed in the SEA Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage and landscape), as relevant; other likely environmental effects are also covered, as appropriate.	Expected in the Preferred Options and Proposed Submission IIAs
Both positive and negative effects are considered, and the duration of effects (short, medium or long-term) is addressed.	Expected in the Preferred Options and Proposed Submission IIAs
Likely secondary, cumulative and synergistic effects are identified where practicable.	Expected in the Preferred Options and Proposed Submission IIAs
Inter-relationships between effects are considered where practicable.	Expected in the Preferred Options and Proposed Submission IIAs
The prediction and evaluation of effects makes use of relevant accepted standards, regulations, and	Expected in the Preferred Options and Proposed

thresholds.	Submission IIAs
Methods used to evaluate the effects are described.	Expected in the Preferred Options and Proposed Submission IIAs
<b>Mitigation measures</b>	<b>IIA reference</b>
Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated.	Expected in the Preferred Options and Proposed Submission IIAs
Issues to be taken into account in project consents are identified.	Not required
<b>The Environmental Report</b>	<b>IIA reference</b>
Is clear and concise in its layout and presentation.	All stages of the IIA
Uses simple, clear language and avoids or explains technical terms.	All stages of the IIA
Uses maps and other illustrations where appropriate.	Expected in the Preferred Options and Proposed Submission IIA if appropriate
Explains the methodology used.	All stages of the IIA
Explains who was consulted and what methods of consultation were used.	All stages of the IIA
Identifies sources of information, including expert judgement and matters of opinion	All stages of the IIA
Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered, and any changes to the plan resulting from the SEA.	All stages of the IIA
<b>Consultation</b>	<b>IIA reference</b>
The SEA is consulted on as an integral part of the plan-making process.	All stages of the IIA
Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate time frames to express their opinions on the draft plan and Environmental Report.	All stages of the IIA
<b>Decision-making and information on the decision</b>	<b>IIA reference</b>
The environmental report and the opinions of those consulted are taken into account in finalising and adopting the plan or programme.	All stages of the IIA
An explanation is given of how they have been taken into account.	Expected in the Preferred Options and Proposed Submission IIAs
Reasons are given for choosing the plan or programme as adopted, in the light of other reasonable alternatives considered.	Expected in Proposed Submission IIAs
<b>Monitoring measures</b>	<b>IIA reference</b>
Measures proposed for monitoring are clear,	Expected in Proposed

practicable and linked to the indicators and objectives used in the SEA.	Submission IIAs
Monitoring is used, where appropriate, during implementation of the plan or programme to make good deficiencies in baseline information in the SEA.	To be reported in AMR if appropriate
Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.)	To be reported in AMR if appropriate
Proposals are made for action in response to significant adverse effects.	To be reported in AMR if appropriate

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<sup>i</sup> United Nations Environment Programme (UNEP) (2009). Climate Change Science Compendium. Available at: <http://www.unep.org/compendium2009/>

## **Appendix 12: Reasonable alternatives considered**

This appendix sets out all reasonable alternatives considered within different iterations (Preferred Option; Proposed Submission Version, Proposed changes to the Submitted New Southwark Plan, Main Modifications) of the Plan.

The sites within the Old Kent Road Area Action Plan also include the capacity for residential units within the whole opportunity area as identified within the London Plan and also the low, medium and high options considered within the OKR Place Making Study 2016 (Allies and Morrison). It also considers the site allocation capacities within the different iterations of the Old Kent Road Area Action Plan.

**Aylesbury Site**

NSP01a Aylesbury Action Core

<b>Site allocation: NSP01A Aylesbury Action Area Core</b>						
Alternatives considered						
<p>Aylesbury Action Area Core is now proposed as a site allocation given the significant amount of housing to be delivered through the redevelopment which will contribute to our housing supply. The Aylesbury estate regeneration is to be delivered through a partnership with Southwark Council and Notting Hill Genesis and the delivery timeframe is based on the planned phasing of the development.</p> <p>Redevelopment will come forward in four phases as indicated in the site allocation. There will be a minimum 4,200 new homes built, replacing around 2,700 original homes, with a net increase of at least 1,500 homes.</p> <p>The capacity was determined through masterplanning work undertaken through the preparation of the Aylesbury Area Action Plan which has been carried forward to the New Southwark Plan. Options for the estate regeneration were considered through the preparation of the Area Action Plan. An outline planning application and a full planning application were approved in 2015 setting the parameters for development of the site.</p> <p>The delivery of the already approved schemes are expected to come forward in 0-5 years and 6-15 years. Any remaining capacity is expected to come forward in 6-15 years.</p>						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP / minimum capacity</b>
		N/A	N/A	N/A	N/A	1,500 (net)

<b>Bankside and The Borough Sites</b>	
NSP01	Site Bordering Great Suffolk Street and Ewer Street
NSP02	62-67 Park Street
NSP03	185 Park Street
NSP04	London Fire and Emergency Planning Authority
NSP05	1 Southwark Bridge Road and Red Lion Court
NSP06	Landmark Court
NSP07	Land between Great Suffolk Street and Glasshill Street
NSP08	Swan Street Cluster
NSP09	19, 21 and 23 Harper Road, 325 Borough High Street, 1-5 and 7-11 Newington Causeway, SE1

**Site allocation: NSP01 Site Bordering Great Suffolk Street and Ewer Street**

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;
- The site lies within the Borough View south from the centre of Millennium Bridge;
- Bankside and Borough District Town Centre;
- Bankside, Borough and London Bridge Opportunity Area;
- The site is in the Central Activity Zone; and
- The site benefits from Tier 1 Archaeological Priority Area (APA) designation. The site is located in APA1 -North Southwark and Roman Roads.

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, listed buildings, archaeology; Central Activities Zone; town centre, opportunity area and Borough View south from the centre of Millennium Bridge. A lower option may not optimise the use of the site. The capacity for residential had been reduced to account for the northern part of the site delivering a solely commercial scheme.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		209	106	166	209	40

**Site allocation: NSP02 62-67 Park Street**

## Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. Redevelopment must be sensitive to the Thames Policy Area, where building heights should be lower in close the proximity to the River Thames;
- The site is within the setting of Grade II listed Union Works and undesignated heritage assets including Tate Modern, City of London Corporation Housing and building of townscape merit 6-8 Emerson Street;
- The site is within the setting of Bear Gardens Conservation Area;
- Bankside and Borough District Town Centre;
- Bankside, Borough and London Bridge Opportunity Area;
- The majority of the site lies within the Borough View of St Paul's Cathedral along Camberwell Road. The site lies within the Borough View south from the centre of the Millennium Bridge and the river prospect Borough View from Kings Stairs Gardens to Tower Bridge. The site also lies within the Background Assessment Area of LVMF view 1A.2 - Alexandra Palace Viewing Terrace to St Paul's Cathedral;
- The site benefits from Tier 1 Archaeological Priority Area (APA) designation. The site is located in APA1 - North Southwark and Roman Roads;
- The site is in close proximity to The Hope Theatre and Bear Baiting Arenas and relates to the internationally important Rose and Globe theatre sites;
- The site is within the Thames Policy Area;
- The site is in the Central Activity Zone (CAZ); and
- The site is in proximity to the Tate Community Garden (Other Open Space) and Tate Modern (Borough Open Land).

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, heritage, townscape, listed buildings, undesignated heritage assets, buildings of townscape merit, town centre, opportunity area, conservation area; Borough View of St Paul's Cathedral along Camberwell Road; on Borough View south from the centre of the Millennium Bridge; Borough View from Kings Stairs Gardens to Tower Bridge and view 1A.2 - Alexandra Palace Viewing Terrace to St Paul's Cathedral; theatre sites, archaeology, Thames Policy Area, Central Activity Zone and designated open space. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative
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						<b>capacity</b>
		165	165	80	165	80

<b>Site allocation: NSP03 185 Park Street</b>						
Alternatives considered						
The capacity has been determined by planning application 14/AP/3842. As the capacity has been tested by a planning application, this capacity represents the optimum use of the site. Within this table the different options considered during the plan making process are also presented.						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Planning application 14/AP/3842</b>	<b>Main Modifications to the NSP / indicative capacity</b>
		217	163	163	163	163

**Site allocation: NSP04 London Fire and Emergency Planning Authority**

Alternatives considered

The capacity has been determined by planning application 17/AP/0367. As the capacity has been tested by a planning application, this capacity represents the optimum use of the site. Within this table the different options considered during the plan making process are also presented.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Approved application 17/AP/0367	Main Modifications to the NSP / minimum capacity
		167	205	199	199	199

**Site allocation: NSP05 1 Southwark Bridge Road and Red Lion Court**

**Alternatives considered**

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. The design of the development should respond to its prominent, yet sensitive setting as an arrival point into Southwark from Southwark Bridge. Redevelopment must be sensitive to the Thames Policy Area, where building heights should be lower in close the proximity to the River Thames;
- The site is located within the setting of the Grade II listed Southwark Bridge, Anchor Terrace (1 Southwark Bridge Road), Anchor Public House (1 Bankside) and Union Works;
- Bankside and Borough District Town Centre;
- Bankside, Borough and London Bridge Opportunity Area;
- The site is located in the setting of the Bear Gardens and Thrale Street Conservation Areas;
- The site lies within the Borough Views of St Paul’s Cathedral from Nunhead Cemetery and One Tree Hill. The site lies within the river prospect Borough View from Kings Stairs Gardens to Tower Bridge. The majority of site lies within the Background Assessment Area of the LVMF view 1A.2 - Alexandra Palace Viewing Terrace to St Paul’s Cathedral. The site also partially lies within the Background Assessment Area of the LVMF view 3A.1 Kenwood Viewing Gazebo to St Paul’s Cathedral;
- The site benefits from Tier 1 Archaeological Priority Area (APA) designation. The site is located in APA1 - North Southwark and Roman Roads;
- The site is within a few metres of the internationally important Globe Theatre and Rose Theatre scheduled monuments;
- The site is within the Thames Policy Area; and
- The site is in the Central Activity Zone.

The optimum development capacity was arrived at using the sites methodology approach. Within previous iterations of the plan higher capacity options were considered for this site, and not taken forward. Any proposals for a higher option would need to consider the existing character, heritage, townscape, listed buildings, town centre, opportunity area, conservation area; Borough Views of St Paul’s Cathedral from Nunhead Cemetery and One Tree Hill; Borough View from Kings Stairs Gardens to Tower Bridge and view 1A.2 - Alexandra Palace Viewing Terrace to St Paul’s Cathedral; archaeology, scheduled monuments, Thames Policy Area and Central Activity Zone. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
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		303	273	261	303	261
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<b>Site allocation: NSP06 Landmark Court</b>						
Alternatives considered						
The capacity has been determined by planning applications 19/AP/0830 and the capacity was similar to the capacity set out within the Site Allocations Methodology Paper. As the capacity has been tested by planning applications, this capacity represents the optimum use of the site.						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Approved application 19/AP/0830</b>	<b>Main Modifications to the NSP / indicative capacity</b>
		Not included	118	36	36	36

**Site allocation: NSP07 Land between Great Suffolk Street and Glasshill Street**

**Alternatives considered**

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- The site is in the setting of the Grade II listed Drapers' Almshouses (1820);
- The site is adjacent to Kings Bench Conservation Area;
- Bankside and Borough District Town Centre;
- Bankside, Borough and London Bridge Opportunity Area;
- The site lies within the Borough View south from the centre of the Millennium Bridge;
- In accordance with Historic England's 'Greater London Archaeological Priority Area Guidelines' although outside of an Archaeological Priority Area, the site is over 0.5ha and should be acknowledged as a tier 4 designation within the APA tier system. As a result of this the site should be assessed for archaeological significance;
- The site is in the Central Activity Zone; and
- The site is in proximity to Grotto Open Space (Borough Open Land) and Grotto Podiums (Other Open Space).

The optimum development capacity was arrived at using the sites methodology approach. Within previous iterations of the plan higher options were considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, heritage, townscape, listed buildings, town centre, opportunity area, conservation area, Borough View south from the centre of the Millennium Bridge, archaeology, central activity zone and designated open space. A lower option may not optimise the use of the site. The capacity has been reduced in the main modifications to reflect a more accurate minimum/indicative capacity.

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP / indicative capacity</b>
		148	166	132	166	66

**Site allocation: NSP08 Swan Street Cluster - Site A, Site B and Site C**

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;
- Redevelopment must enhance the setting of the Grade II\* listed St George the Martyr Church, Grade II listed buildings to the south east and the nearby Trinity Church Square;
- Part of the Avon House site lies within the Bankside, Borough and London Bridge Opportunity Area;
- Redevelopment must enhance the setting of the Liberty of the Mint, Borough High Street and Trinity Church Square Conservation Areas. Existing mature landscaping provides significant amenity and screening value to the Conservation Areas;
- The cluster lies within the Background Assessment Area of LVMF view 1A.2 - the Alexandra Palace viewing terrace to St Paul's Cathedral;
- The site benefits from Tier 1 Archaeological Priority Area (APA) designation. The site is located in APA1 - North Southwark and Roman Roads. There is exceptional interest of this general location with regard to the Roman archaeology of Southwark. There is a high potential for human remains to be present on site in the form of Roman inhumation and cremation burials, with associated grave goods and ritual and non-ritual structures and artefacts;
- The site is in the Central Activity Zone; and
- The northern part of the cluster is in proximity to St George's Churchyard and Gardens (Borough Open Land).

Following the Hearing for the Examination in Public of the NSP and as requested by the Inspectors, the Main Modifications to the NSP, set out site requirements for the individual clusters and identify these as Site A, Site B and Site C.

The optimum development capacity was arrived at using the sites methodology approach. Within previous iterations of the plan higher capacity option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, heritage, townscape, listed buildings, conservation area and mature landscaping; view 1A.2 - the Alexandra Palace viewing terrace to St Paul's Cathedral; archaeology, opportunity area, central activity zone and designated open space. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		Not included	198	98	198	98

**Site allocation: NSP09 19, 21 and 23 Harper Road, 325 Borough High Street, 1-5 and 7-11 Newington Causeway, SE1**

Alternatives considered

The capacity has been determined by planning application 18/AP/0657. There are 7 existing residential units; as such the net residential uplift would be 13 units. As the capacity has been tested by a planning application, this capacity represents the optimum use of the site. Within this table the different options considered during the plan making process are also presented.

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Approved application 18/AP/0657</b>	<b>Main Modifications to the NSP / minimum capacity</b>
		Not included	58	13 (net)	13 (net)	13 (net)

<b>Bermondsey</b>
NSP10 Biscuit Factory and Campus
NSP11 Tower Workshops
NSP12 Chambers Wharf

**Site allocation: NSP10 (Biscuit Factory)**

## Alternatives considered

Planning application 17/AP/4088 (GLA reference 3776a) was considered on this site, with a capacity of 1,342 units. Southwark advised the Mayor that it was minded to refuse permission for the redevelopment proposals, and the Mayor having considered a report on the case, notified Southwark that he would act as the local planning authority for the purposes of determining the planning application. Subsequent to the direction that the Mayor will become the local planning authority, the applicant has submitted to the Mayor revisions to the application. The revisions included an increase in the number of residential units from 1,342 to 1,548 (+206). The Mayor has granted planning permission for the application, and the S106 legal agreement was signed in June, 2020.

As such the planning application represents the optimum use of the site. Within this table the different options considered during the plan making process are also presented.

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Planning application 17/AP/4088</b>	<b>Main Modifications to the NSP / minimum capacity</b>
		1,500	1,343	1,548	1,548	1,548

**Site allocation: NSP11 (Tower Workshops)**

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- The site lies within the Background Assessment Area of LVMF view 2A.1 - Parliament Hill summit to St Paul's Cathedral; and
- Partially falls within the Background Assessment Area of LVMF view 3A.1 - Kenwood Viewing Gazebo to St Paul's Cathedral;
- The site is located in Archaeological Priority Area 1 - North Southwark and Roman Roads;
- The site is in proximity of Abbey buildings

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, listed building and archaeology. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		202	178	178	202	178

**Site allocation: NSP12 (Chambers Wharf)**

Alternatives considered

The capacity has been determined by planning applications 07/AP/1262. As the capacity has been tested by planning applications, this capacity represents the optimum use of the site. Within this table the different options considered during the plan making process are also presented.

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Planning application 07/AP/1262</b>	<b>Main Modifications to the NSP / minimum capacity</b>
		407	587	587	587	587

<b>Blackfriars</b>
NSP13 Conoco House, Quadrant House, Edward Edwards House and Suthring House
NSP14 Friars House, 157-168 Blackfriars Road
NSP15 Land enclosed by Colombo Street, Meymott Street and Blackfriars Road
NSP16 Ludgate House and Sampson House, 64 Hopton Street
NSP17 Southwark Station and 1 Joan Street
NSP18 McLaren House, St George's Circus
NSP19 Land between Paris Gardens, Colombo Street, Blackfriars Road and Stamford Street
NSP20 1-5 Paris Garden and 16-19 Hatfields

**Site allocation:** NSP13 Conoco House, Quadrant House, Edward Edwards House and Suthring House

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;
- The site is in proximity of Grade II listed Rochester House, Christ Church and the undesignated heritage asset the Rectory;
- The site is in proximity of the Roupell Street Conservation Area in Lambeth;
- The site benefits from Archaeological Priority Area (APA) Tier 1 designation. The site is located in APA1 - North Southwark and Roman Roads. The site has potential to contain multi-phase archaeological deposits and an archaeological assessment is required for this site;
- The site is in Bankside and Borough District Town Centre;
- The site is in Bankside, Borough and London Bridge Opportunity Area; and
- The site is in proximity to Christchurch Gardens (Borough Open Land and Site of Importance for Nature Conservation)

There are existing residential units currently on site, as follows:

- 36 units in Quadrant House
- 6 units in Suthring House
- 25 almshouses in Edward Edwards' House owned and managed by Southwark Charities

The optimum development capacity was arrived at using the sites methodology approach, being 124 net units in addition to the existing residential units on site. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, listed buildings, archaeology, town centre, opportunity area, the Central Activities Zone and designated open space. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity

		180	191	124 (net)	191	124 (net)
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<b>Site allocation:</b> NSP14 Friars House, 157-168 Blackfriars Road						
Alternatives considered						
<p>The capacity has been determined by planning application 20/AP/0556. The proposal approved under this application is a non-residential scheme comprising a hotel (Class C1), flexible commercial or community unit (Class B1/D1) and retail floorspace (Class A1/A3). As the capacity has been tested by a planning application, this capacity represents the optimum use of the site. Within this table the different options considered during the plan making process are also presented.</p>						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Planning application 20/AP/0556</b>	<b>Main Modifications to the NSP</b>
		169	180	0	0	0

**Site allocation:** NSP15 Land enclosed by Colombo Street, Meymott Street and Blackfriars Road

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;
- The site is directly opposite Grade II listed building Christ Church and is in proximity of undesignated heritage assets the Rose and Crown Public House and the Rectory;
- The site is in proximity of some Lambeth Conservation Areas, especially Roupell Street;
- The site benefits from Tier 1 Archaeological Priority Area (APA) designation. The site is located in APA1 North Southwark and Roman Roads. Prehistoric alluvial deposits and an east-west aligned channel have been recorded at Wedge House and archaeological assessment is required for the remainder of this site;
- Bankside and Borough District Town Centre;
- Bankside, Borough and London Bridge Opportunity Area;
- Central Activities Zone; and
- The site is in proximity to the designated Christchurch Gardens (Borough Open Land and Site of Importance for Nature Conservation) Paris Gardens (Borough Open Land).

Application 15/AP/0237 is relevant for this site, and it only covers part of the site allocation. Under this application a non-residential scheme was approved, and this is now completed. The rest of the site has the potential for a mixed use development, including residential provision. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, heritage, listed buildings, conservation area, archaeology, town centre, opportunity area, the Central Activities Zone and designated open space. A lower option may not optimise the use of the site.

Application 16/AP/1660 was relevant to Friars Bridge Court at 41-45 Blackfriars Road within the site allocation. The following scheme was granted permission: demolition of existing office building (Class B1a) and redevelopment to provide a part 13, part 22 storey building plus basement comprising offices (Class B1a) with retail (Classes A1/A3 and A4) together with servicing, car parking and landscaping. This application has now expired. Friars Bridge Court is now undergoing an office refurbishment rather than redevelopment.

The remaining site is the Colombo Sport Centre which is a community gym owned freehold by Southwark Council and operated by Coin Street. Some

intensification of the site to include residential and community uses may be possible but not at the scale originally envisaged with adjoining landowners. The capacity for new homes is currently unknown.

Options considered summary		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP – Indicative capacity</b>
		150	N/A	198	355	Unknown

**Site allocation:** NSP16 Ludgate House and Sampson House, 64 Hopton Street

Alternatives considered

The capacity has been determined by planning applications 12/AP/3940 and 18/AP/1603. As the capacity has been tested by planning applications, this capacity represents the optimum use of the site. Within this table the different options considered during the plan making process are also presented.

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Planning applications (12/AP/3940 &amp; 18/AP/1603)</b>	<b>Main Modifications to the NSP / minimum capacity</b>
		489	492	598	598	598

**Site allocation:** NSP17 Southwark Station and 1 Joan Street

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Development proposals must recognise the site's close proximity to the borough boundary and must consider the setting of heritage assets in Lambeth, in addition to any cross-boundary issues and the provisions of policies and site allocations within reasonable proximity of the site as set out in the Lambeth Local Plan;
- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;
- The site is within the setting of Grade II listed buildings on Blackfriars Road and abuts the undesignated heritage asset of the railway viaduct to the north;
- The site benefits from Archaeological Priority Area (APA) Tier 1 designation. The site is located in APA1 - North Southwark and Roman Roads;
- The site is in Bankside and Borough District Town Centre;
- The site is in Bankside, Borough and London Bridge Opportunity Area;
- The site is in the Central Activity Zone; and
- The site can provide Low Line walking routes.

Application 20/AP/1189 has been approved at Planning Committee subject to a legal agreement, and it occupies part of the site allocation. The proposal under this application is for the: Redevelopment of the site including the demolition of Nos. 49-56 Hatfields and No 1 Joan Street to provide a 17 storey (plus plant) building above Southwark Underground Station accommodating Class B1 office space and Class A1/A2/A3/A4/A5 retail space and Class B1/D1 flexible workspace. The development includes associated basement construction, public realm improvements and associated highways works including the closure of Joan Street. The approval of this application has reduced the residential capacity of this site.

Another application has been approved at Planning Committee subject to a legal agreement that is relevant to this site is 20/AP/0969, which is for the redevelopment of Styles House and occupies the remainder of the site. The proposal under this application is for the: Redevelopment of the site to include the demolition of existing buildings (the Platform Southwark building, the existing tenant management organisation hall, nine garages, a sub-station, eight studio apartments, and a storage and boiler room building); the retention and improvement to the existing Styles House building; the erection of 25 new dwellings, a new substation, a new community centre and tenant management organisation facilities; car and cycle parking; a new boiler house; landscaping; access and associated works.

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, listed buildings, archaeology, town centre, opportunity area and the Central Activities Zone. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		175	130	130	175	16 (net)

<b>Site allocation:</b> NSP18 McLaren House, St George's Circus
Alternatives considered
<p>The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.</p> <p>No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:</p> <ul style="list-style-type: none"> <li>- The frontage of the development to St George's Circus must be concave to retain the curved Circus;</li> <li>- Redevelopment should retain the Cycle Super Highway and support the boulevard character on Blackfriars Road;</li> <li>- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;</li> <li>- The site is located within the setting of the Grade II* listed Obelisk and Grade II listed buildings on London Road, Borough Road, and the Peabody Buildings on Blackfriars Road;</li> <li>- The site is adjacent to the St George's Circus Conservation Area boundary;</li> <li>- The site does not impact an Archaeological Priority Area but archaeological assessment is required as the first stage in archaeological mitigation for this large site;</li> <li>- The site is in Elephant and Castle Major Town Centre;</li> <li>- The site is in Bankside, Borough and London Bridge Opportunity Area; and</li> <li>- The site in the Central Activity Zone.</li> </ul> <p>The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, listed buildings, conservation area, archaeology, town centre, opportunity area and the Central Activities Zone. A lower option may not optimise the use of the site.</p>

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP / minimum capacity</b>
		262	215	215	262	215

<b>Site allocation:</b> NSP19 Land between Paris Gardens, Colombo Street, Blackfriars Road and Stamford Street						
Alternatives considered						
The capacity has been determined by planning application 16/AP/5239. As the capacity has been tested by a planning application, this capacity represents the optimum use of the site. Within this table the different options considered during the plan making process are also presented.						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Planning application 16/AP/5239</b>	<b>Main Modifications to the NSP / indicative capacity</b>
		504	288	288	288	288

<b>Site allocation:</b> NSP20 1-5 Paris Garden and 16-19 Hatfields						
Alternatives considered						
The capacity has been determined by planning application 17/AP/4230, which is for an office redevelopment with retail uses at ground floor level. Therefore, no residential capacity has been included for this site in the NSP Submission Version. Within this table the different options considered during the plan making process are also presented.						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Planning application 17/AP/4230</b>	<b>Main Modifications to the NSP</b>
		223	220	N/A	N/A	N/A

<b>Camberwell Sites</b>
NSP21 Camberwell Station
NSP22 Burgess Business Park
NSP23 Butterfly Walk and Morrisons Car Park and police station
NSP24 Valmar Trading Estate
NSP25 Camberwell Bus Garage
NSP26 Abellio Walworth Depot
NSP27 Land Between Camberwell Station Road and Warner Road
NSP28 Iceland, 120-132 Camberwell Road
NSP29 49 Lomond Grove
NSP30 83 Lomond Grove
NSP31 123 Grove Park
NSP32 Camberwell Green Magistrates Court
NSP33 Denmark Hill Campus East

<b>Site allocation: NSP21 Camberwell Station</b>						
Alternatives considered						
This site allocation is required to provide a new station at Camberwell; employment floorspace and active frontages with town centre uses. The site allocation is not required to provide residential use, as such, no residential capacity has been provided across different iterations of the plan for this site allocation.						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP</b>
		N/A				

**Site allocation: NSP22 Burgess Business Park**

Alternatives considered

The capacity for this site was determined by considering the two planning permissions on the site (which do not propose any housing), the three live planning applications on the site (which propose housing) and the remaining capacity was determined using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. Buildings of merit were assumed to be retained. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

The following site constraints were considered for the remaining capacity on this site:

- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;
- The site contains Grade II listed buildings 73, 75, 77 Southampton Way and other Grade II listed buildings are located on Wells Way and Cottage Green. The site also includes the historic semi-detached townhouse on the corner of Southampton Way and Parkhouse Street. Redevelopment must conserve and enhance the setting of these heritage assets;
- Although the site is not within an Archaeological Priority Area (APA), an archaeological assessment is required as the site is over 0.5 ha and in accordance with Historic England's 'Greater London Archaeological Priority Area Guidelines' the site should be acknowledged as a Tier 4 APA; and
- The site is in proximity to the designated Burgess Park (Metropolitan Open Land and Site of Importance for Nature Conservation).

The optimum development capacity was arrived at using the sites methodology approach. The capacity of this site has been increased during different iterations of the plan to more appropriately reflect the capacity of the site and optimise the use of this. The higher option is based on the live planning applications on the site, the dismissed appeal decision 17/AP/4794 at land at Burgess Business Park and Parkhouse Street, along with the remaining capacity on the site. Any proposals for a higher option would need to consider the existing character, heritage townscape, listed buildings, archaeology and open space. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / minimum capacity
		498	437	681	810	681

**Site allocation: NSP23 Butterfly Walk and Morrisons Car Park and Police Station**

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

The following site constraints were considered for this site:

- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. The south and east areas of the site should be lower rise;
- The site lies partially within the Camberwell Green Conservation Area and is in proximity of Camberwell Grove Conservation Area;
- The site is in proximity to Grade II listed buildings on Jephson Street and Camberwell Church Street;
- The site is in Camberwell District Town Centre;
- The site benefits from Tier 2 Archaeological Priority Area (APA) designation. The site is located in APA3 - Camberwell Village; and
- The site is in proximity to Camberwell Green (Borough Open Land).

The optimum development capacity was arrived at using the sites methodology approach. Within previous iterations of the plan higher capacity options were considered for this site, however this has been subsequently reduced to be better suited with the site requirements and site surroundings. Any proposals for a higher option would need to consider the existing character, heritage, townscape, listed buildings, conservation area, town centre, archaeology and designated open space. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / minimum capacity
		338	286	230	338	230

**Site allocation: NSP24 Valmar Trading Estate**

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

The following site constraints were considered for this site:

- The site lies partially within the Camberwell Green Conservation Area;
- The site is in Camberwell District Town Centre; and
- The site benefits from Tier 2 Archaeological Priority Area (APA) designation. The site is located in APA3 - Camberwell Village.

The optimum development capacity was arrived at using the sites methodology approach. Within previous iterations of the plan higher capacity options were considered for this site, however this has been subsequently reduced to be better suited with the site requirements and site surroundings. Any proposals for a higher option would need to consider the existing character, heritage, townscape, town centre, conservation area and archaeology. A lower option may not optimise the use of the site.

The site has planning permission covering the majority of the site (19/AP/0864) for: 'Redevelopment of the site to include the demolition of the existing buildings and construction of three buildings of: 7 storeys (plus single storey basement), 6 storeys and 4 storeys across the site providing employment space with ancillary screening room and gallery space (Use Class B1), 127 hotel rooms (Use Class C1), 43 residential units (Use Class C3) and a café (Class A3); together with associated landscaping works and provision of refuse storage, cycle parking, disabled car parking and amenity space.'. The capacity has therefore been updated to reflect the 43 units approved.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		78	67	48	78	43

**Site allocation: NSP25 Camberwell Bus Garage**

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

The following site constraints were considered for this site:

- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;
- The site is within the setting of a number of Grade II Listed buildings on Camberwell New Road, the important unlisted Greek Orthodox Cathedral and undesignated heritage assets including Warner Road mansion blocks. The brick bus garage should also be retained where possible;
- The site is in Camberwell District Town Centre;
- The site lies between Camberwell Green Conservation; and
- The site partially lies within the Background Assessment Area of LVMF view 4A.2 - Palace of Westminster from Primrose Hill Summit; and
- The site benefits from Tier 2 Archaeological Priority Area (APA) designation. The site is located in APA3 - Camberwell Village. An archaeological assessment is required for this large site.

The optimum development capacity was arrived at using the sites methodology approach. Within previous iterations of the plan a higher capacity option was considered for this site, however this has been subsequently reduced to be better suited with the site requirements and site surroundings. Any proposals for a higher option would need to consider the existing character, heritage, townscape, listed buildings, undesignated heritage assets, town centre, conservation area, archaeology and on view 4A.2 - Palace of Westminster from Primrose Hill Summit. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		319	264	264	319	264

**Site allocation: NSP26 Abellio Walworth Depot**

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

The following site constraints were considered for this site:

- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;
- The site is within the setting of Grade II listed building The Regal Cinema and other Grade II listed buildings on Camberwell New Road. The site is within the setting of the important unlisted Greek Orthodox Cathedral and undesignated heritage asset of the railway viaduct;
- The site is in Camberwell District Town Centre;
- The site lies partially within Camberwell Green Conservation Area and is in close proximity of Camberwell New Road Conservation Area;
- The site benefits from tier 2 Archaeological Priority Area (APA) designation. The site is located in APA3 - Camberwell Village; and
- The site is in proximity to Camberwell Green (Borough Open Land).

The optimum development capacity was arrived at using the sites methodology approach. Within previous iterations of the plan a higher capacity option was considered for this site, however this has been subsequently reduced to be better suited with the site requirements and site surroundings. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, heritage, townscape, listed buildings, town centre, conservation area, archaeology and designated open space. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		325	196	196	325	196

**Site allocation: NSP27 Land Between Camberwell Station Road and Warner Road**

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

The following site constraints were considered for this site:

- Development proposals must recognise the site's close proximity to the borough boundary and must consider the function of Camberwell Trading Estate, in addition to any cross-boundary issues and the provisions of policies and site allocations within reasonable proximity of the site as set out in the Lambeth Local Plan;
- The site is in Camberwell District Town Centre;
- The site lies partially within the Background Assessment Area of LVMF view 4A.2 - Palace of Westminster from Primrose Hill Summit; and
- Although the site is not within an Archaeological Priority Area (APA), but an archaeological assessment will be required for this large site;

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, heritage, townscape, town centre; the proximity to borough boundary with Lambeth, archaeology and view 4A.2 - Palace of Westminster from Primrose Hill Summit. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		74	64	64	121	64

**Site allocation: NSP28 Iceland, 120-132 Camberwell Road**

## Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

The following site constraints were considered for this site:

- The site is within the setting of Grade II Listed buildings and the undesignated heritage assets of the railway viaduct to rear. The site is opposite to the Grade II listed terraces 117-129 and 131-155 Camberwell Road;
- The site is in proximity to the Addington Square Conservation Area; and
- The site lies just outside of the Borough View of St Paul's Cathedral along Camberwell Road.

There are currently 6 residential units on this site. The optimum development capacity was arrived at using the sites methodology approach, being 39 net units in addition to the existing residential units on site. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, heritage, townscape, listed buildings and conservation area. A lower option may not optimise the use of the site.

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP / indicative capacity</b>
		63	43	39 (net)	63	39 (net)

**Site allocation: NSP29 49 Lomond Grove**

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, heritage and townscape. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		45	39	39	65	39

**Site allocation: NSP30 83 Lomond Grove**

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

The following site constraints were considered for this site:

- Site is immediately adjacent to Grade II listed buildings at 99, 101 and 103 Lomond Grove.

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, heritage, townscape and listed buildings. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		70	51	50	70	50

**Site allocation: NSP31 123 Grove Park**

## Alternatives considered

The capacity has been determined by planning application 17/AP/4124. The proposal was for: Change of use from Class D1 with an ancillary Class B1 office function to Class C3 for residential use, including conversion and part demolition of existing main house to enable the creation of x5 new residential units and the construction of x4 new residential units in the rear garden with x9 off street parking spaces, associated communal and private landscaped areas.

As the capacity has been tested by a planning application, this capacity represents the optimum use of the site. Within this table the different options considered during the plan making process are also presented.

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Approved application 17/AP/4124</b>	<b>Main Modifications to the NSP / minimum capacity</b>
		21	Indicative development capacity reflects current capacity	9	9	9

**Site allocation: NSP32 Camberwell Green Magistrates Court**

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

The following site constraints were considered for this site:

- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;
- The site is in proximity to Grade II listed building Camberwell Public Baths. Redevelopment must enhance the setting of important unlisted Peabody Buildings;
- The site is within the setting of the Camberwell Green Conservation Area;
- The site is in Camberwell District Town Centre;
- The site benefits from Tier 2 Archaeological Priority Area (APA) designation. The site is located in APA3 - Camberwell Village. Archaeological assessment of site is required as it has the potential to contain multi-phase archaeological deposits; and
- The site is in proximity to Camberwell Green (Borough Open Land).

The optimum development capacity was arrived at using the sites methodology approach. The capacity of this site has been increased during different iterations of the plan to more appropriately reflect the capacity of the site and optimise the use of this. Any proposals for a higher option would need to consider the existing character, heritage, townscape, listed buildings, conservation area, town centre, archaeology and open space. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		Not included	45	150	150	150

**Site allocation: NSP33 Denmark Hill Campus East**

Alternatives considered

This site allocation is a land use policy requirement only and is not intended for residential redevelopment. Therefore, no residential capacity has been provided across different versions of the plan. In this case the site is suitable for continued use for health, research and education facilities. If approved live application 20/AP/2768 would provide 187 residential units, a nursery facility and play space. The residential proposal has come about as there are a number of old redundant buildings on site as a result of consolidating and enhancing medical facilities elsewhere on the hospital campus. Provision of residential units has come forward on the basis that there would be no reduction in the amount of medical floorspace or range of services. The residential units would generate funds for future improvements and expansion of medical uses on the other parts of the campus. If the application is approved it is expected to come forward 6- 15 years.

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP</b>
		Land use policy - not an opportunity for comprehensive redevelopment				

<b>Crystal Palace and Gipsy Hill Sites</b>
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NSP34 Guys and St Thomas Trust Rehabilitation Centre, Crystal Palace
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**Site allocation:** NSP34 Guys and St Thomas Trust Rehabilitation Centre, Crystal Palace

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- The site is located adjacent to the intersection of the three borough boundaries of Southwark, Lambeth and Bromley. Accordingly, development proposals must consider any cross-boundary issues as well as the provisions of policies and site allocations within reasonable proximity to the site as set out in the Lambeth Local Plan and the Draft Bromley Local Plan;
- The site is adjacent to the Crystal Place arches which are an undesignated heritage asset with a Grade II listed pedestrian subway under Crystal Palace Parade to the north east of the site. Development should contribute towards enhancing the subway, and enhancing the setting of the subway. The mature trees which line the perimeter of the site on the east and west boundary should be retained and will provide a visual screen for the new development; and
- The site is in proximity to Dulwich Upper Wood (Metropolitan Open Land and Site of Importance for Nature Conservation) and Crystal Palace Park.

The optimum development capacity was arrived at using the sites methodology approach. Within previous iterations of the plan higher capacity options were considered for this site, however these have been subsequently reduced to be better suited with the site requirements and site surroundings. Any proposals for a higher option would need to consider the existing character, townscape, listed buildings, heritage assets and designated open space. A lower option may not optimise the use of the site.

Guy's and St Thomas' have submitted a Matter Statement to Matter 10 of the NSP which confirms the potential for the future development of the site, this also confirms the potential capacity of the site to deliver 103 homes which have been amended accordingly.

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher options</b>	<b>Main Modifications to the NSP / indicative capacity</b>
		118	103	51	118	103

<b>Dulwich Sites</b>
NSP35 The Grove Tavern, 520 Lordship Lane

**Site allocation:** NSP35 The Grove Tavern, 520 Lordship Lane

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Development should be set back from the busy south circular road and reflect both the open, green aspect of the neighbouring Lordship Lane Estate and the prevailing density of the surrounding area;
- Air quality is poor along the south circular road, and any development should be designed to mitigate its impacts;
- The site is within the setting of Grade II listed St Peter’s Church and parish hall and Dulwich War Memorial. The site includes a public house, which is an undesignated heritage asset that should be retained;
- The site lies within Dulwich Wood Conservation Area;
- The site benefits from Tier 2 Archaeological Priority Area (APA) designation. The site is located in APA 6 – Lordship Lane Burial Mound. Historic maps show a barrow (burial mound) of unknown date was once located on this site. In the 18th century the area was part of Dulwich Wells; and
- The site is in proximity to Dulwich Park (Site of Importance for Nature Conservation and Metropolitan Open Land); Barclay Way, Dulwich Common Allotments and Tennis Club; Dulwich Common Sports Ground and Cricket Club, Cox’s Walk and St Peter’s Churchyard, Lordship Lane (Metropolitan Open Land).

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, listed buildings and undesignated heritage assets, conservation area, air quality, archaeology and designated open space. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		68	63	63	120	63

<b>East Dulwich Sites</b>
NSP36 Kwik Fit and Gibbs and Dandy, Grove Vale
NSP37 Dulwich Hamlet Champion Hill Stadium, Dog Kennel Hill
NSP38 Railway Rise, East Dulwich
NSP39 Dulwich Community Hospital, East Dulwich Grove
NSP40 Goose Green Trading Estate

**Site allocation:** NSP36 Kwik Fit and Gibbs and Dandy, Grove Vale

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Development should respond positively to maintaining established building lines on Grove Vale; and
- The site is within the setting of Grade II listed Goose Green School.

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, listed buildings and undesignated heritage assets, conservation area, air quality, archaeology and designated open space. A lower option may not optimise the use of the site.

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP / indicative capacity</b>
		10	19	19	41	19

<b>Site allocation:</b> NSP37 Dulwich Hamlet Champion Hill Stadium, Dog Kennel Hill						
Alternatives considered						
The capacity has been determined by planning application 19/AP/1867. As the capacity has been tested by a planning application, this capacity represents the optimum use of the site. Within this table the different options considered during the plan making process are also presented.						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Planning application 19/AP/1867</b>	<b>Main Modifications to the NSP / indicative capacity</b>
		501	40	219	219	219

**Site allocation:** NSP38 Railway Rise, East Dulwich

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Redevelopment should enhance the green habitat corridor adjacent to the railway track;
- The site is within the setting of East Dulwich Community Hospital; and
- The site is in proximity to Grove Park Cutting (Borough Open Land and Site of Importance for Nature Conservation).

The optimum development capacity was arrived at using the sites methodology approach. Within previous iterations of the plan a higher capacity option was considered for this site, however this has been subsequently reduced to be better suited with the site requirements and site surroundings. Any proposals for a higher option would need to consider the existing character, townscape and designated open space. A lower option may not optimise the use of the site.

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP / indicative capacity</b>
		73	53	53	73	53

<b>Site allocation:</b> NSP39 Dulwich Community Hospital, East Dulwich Grove						
Alternatives considered						
The capacity has been determined by planning applications 16/AP/2740 and 16/AP/2747, which are for the redevelopment of health and education facilities. Therefore, no residential capacity has been included in the submission version for this site.						
Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP
		N/A				

**Site allocation:** NSP40 Goose Green Trading Estate

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- The site abuts the Grade II listed Dulwich Public Baths. Any redevelopment must protect and enhance the setting of this building; and
- The site is in proximity to the designated Goose Green (Borough Open Land) and Goose Green Playground (Other Open Space).

The optimum development capacity was arrived at using the sites methodology approach. Within the Proposed changes to the Submitted NSP version of the plan it was identified that this site is capable of providing residential units, as such residential capacity was introduced for this site. Any proposals for a higher option would need to consider the existing character, townscape, listed building and designated open space. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		N/A	N/A	83	103	83

<b>Elephant and Castle sites</b>
NSP41 Newington Triangle
NSP42 Bakerloo Line Sidings and 7 St George's Circus
NSP43 63-85 Newington Causeway
NSP44 Salvation Army Headquarters, Newington Causeway
NSP45 Elephant and Castle Shopping Centre and London College of Communication
NSP46 London Southbank University Quarter
NSP47 1-5 Westminster Bridge Road

**Site allocation: NSP41 (Newington Triangle)**

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;
- The site is within the setting of Grade II listed buildings on Borough Road and Newington Causeway as well as undesignated heritage assets including the railway viaduct and buildings on Borough Road and Newington Causeway;
- The site is in Elephant and Castle Major Town Centre;
- The site is in Elephant and Castle Opportunity Area;
- The site is in the Central Activity Zone;
- The site is in proximity of Kings Bench and the Liberty of the Mint Conservation Areas; and
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads. The site has high potential to contain multi-phase archaeological deposits that would require protection.

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, heritage, townscape, listed buildings, undesignated heritage assets, town centre, opportunity area, central activity zone, archaeology and conservation area. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / minimum capacity
		347	438	438	738	438



**Site allocation: NSP42 (Bakerloo Line Sidings and 7 St George's Circus)**

**Alternatives considered**

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;
- The site is located within the setting of the Grade II\* listed Obelisk situated at the centre of St George's Circus and is directly adjacent to Grade II listed buildings on Gladstone Street and London Road. The historic building 'One London Road' should be retained and integrated into any redevelopment;
- The site is almost entirely surrounded by the West Square Conservation Area and St George's Circus Conservation Area;
- The site partially lies within the Background Assessment Area of LVMF view 23A.1 Centre of Bridge over the Serpentine to the Palace of Westminster;
- The site is in Elephant and Castle Major Town Centre;
- The site is in Elephant and Castle Opportunity Area;
- The site is in the Central Activity Zone;
- The site does not impact an Archaeological Priority Area, but Civil War defences may cross the southern part of the site. In accordance with Historic England's 'Greater London Archaeological Priority Area Guidelines' and the site being over 0.5 ha it should be acknowledged as a tier 4 designation within the APA tier system. An archaeological assessment is required for this large site to assess for archaeological significance; and
- Proximity to Geraldine Mary Harmsworth Park (Metropolitan Open Land);

The optimum development capacity was arrived at using the sites methodology approach. Within previous iterations of the plan higher capacity options were considered for this site and not taken forward. The site is constrained by railway lines, as such to take this into consideration and to better optimise the use of the site the capacity of the site has been subsequently reduced. Any proposals for a higher option would need to consider the existing character, heritage, townscape, listed buildings, conservation area, view 23A.1 Centre of Bridge over the Serpentine to the Palace of Westminster, town centre, opportunity area, central activity zone, archaeology and open space. A lower option may not optimise the use of the site.

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP / minimum capacity</b>
		565	454	100	565	100

**Site allocation: NSP43 (63-85 Newington Causeway)**

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Redevelopment should deliver a more complementary and harmonious mix of uses alongside the retained Southwark Playhouse theatre, subject to need, that emphasises its cultural significance, attracts more visitors to the area and creates active frontages on Newington Causeway;
- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;
- The site is within the setting of Grade II listed building Inner London Sessions Court and the undesignated heritage asset Newington Gardens and undesignated heritage assets on Newington Causeway;
- The site is within the setting of the Trinity Church Square Conservation Area;
- The site is in Elephant and Castle Major Town Centre;
- The site is in Elephant and Castle Opportunity Area;
- The site is in the Central Activity Zone;
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads. The site has high potential to contain multi-phase archaeological deposits that would require protection; and
- The site is in close proximity to Newington Gardens (Borough Open Land).

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, listed building, conservation area, town centre, opportunity area, central activity zone, archaeology and designated open space. A lower option may not optimise the use of the site.

Options considered summary		NSP Preferred	NSP PSV	Proposed	Higher option	Main
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(residential units)		Option		changes to the Submitted NSP		Modifications to the NSP / indicative capacity
		241	93	93	241	93

<b>Site allocation: NSP44 (Salvation Army Headquarters, Newington Causeway)</b>						
Alternatives considered						
<p>The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.</p> <p>No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:</p> <ul style="list-style-type: none"> <li>- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;</li> <li>- The site is in Elephant and Castle Major Town Centre;</li> <li>- The site is in Elephant and Castle Opportunity Area;</li> <li>- The site is in the Central Activity Zone;</li> <li>- The site is within the setting of Grade II listed building Metro Central Heights and undesignated heritage assets on Newington Causeway; and</li> <li>- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.</li> </ul> <p>The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, heritage, townscape, town centre, opportunity area, central activity zone, listed building and archaeology. A lower option may not optimise the use of the site.</p>						
Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		88	55	57	88	57

**Site allocation: NSP45 (Elephant and Castle Shopping Centre and London College of Communication)**

Alternatives considered

The capacity has been determined by planning application 16/AP/4458. The proposal is for a mixed use redevelopment, including the construction of 979 units. There are two existing residential units on site; as such the net residential provision would be 977 units. As the capacity has been tested by a planning application, this capacity represents the optimum use of the site. Within this table the different options considered during the plan making process are also presented.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Planning application 16/AP/4458	Main Modifications to the NSP / minimum capacity
		2,570	1,807	977 (net)	977 (net)	977 (net)

<b>Site allocation: NSP46 (London Southbank University Quarter)</b>						
Alternatives considered						
This site allocation is a land use policy requirement only and is not intended for residential redevelopment. The site is suitable for continued use for research and education facilities. Therefore, no residential capacity has been provided across different iterations of the plan for this site allocation.						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP</b>
		N/A				

**Site allocation: NSP47 (1-5 Westminster Bridge Road)**

## Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Redevelopment must successfully relate to the St George's Circus building line;
- A comprehensive mixed-use development will provide an uplift in floorspace, enabling the continued provision of office space, alongside new residential units. Redevelopment must successfully relate to the St George's Circus building line;
- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape;
- The site is in Elephant and Castle Major Town Centre;
- The site is in Elephant and Castle Opportunity Area;
- The site is in the Central Activity Zone;
- The site is within the setting of the Grade II\* listed Obelisk at the centre of St George's Circus and to other Grade II listed buildings on London Road and Borough Road; and
- The site lies partially within the St George's Circus Conservation Area and affects the setting of the West Square Conservation Area.

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, town centre, opportunity area, central activity zone, listed building and conservation area. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		7	21	21	32	21

<b>Herne Hill and North Dulwich Sites</b>
NSP48 Bath Trading Estate

**Site allocation:** NSP48 Bath Trading Estate

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- The site is directly adjacent to Grade II\* listed building Half Moon public house and is in proximity of Grade II listed Herne Hill Baptist Church. Heritage assets in Lambeth must be considered such as the ornate cast iron railway viaduct to the south of the site (locally listed in Lambeth);
- The sites lies partially within and is surrounded on the east side by Stradella Road Conservation Area and to the west is Brockwell Park, a Registered Landscape and Conservation Area; and
- The site is in proximity to Brockwell Park.

Within the submission version of the plan it was identified that this site is capable of providing residential units, as such residential capacity was introduced for this site. The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for the site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, listed buildings, heritage assets, conservation area and Brockwell Park. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		N/A	N/A	45	150	45

<b>London Bridge Sites</b>
NSP49 London Bridge Health Cluster
NSP50 Land between Melior Street, St Thomas Street, Weston Street and Fenning Street
NSP51 Land between St Thomas Street, Fenning Street, Melior Place and Snowsfields
NSP52 Colechurch House, London Bridge Walk

<b>Site allocation:</b> NSP49 London Bridge Health Cluster						
Alternatives considered						
This site allocation is a land use policy requirement only and is not intended for residential redevelopment. Therefore, no residential capacity has been provided across different versions of the plan.						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP</b>
		Land use policy - not an opportunity for comprehensive redevelopment				

<b>Site allocation:</b> NSP50 Land between Melior Street, St Thomas Street, Weston Street and Fenning Street						
Alternatives considered						
<p>Approved application 18/AP/0900 is relevant to this site, which will provide 905 student rooms (this is equivalent to 362 units) with flexible retail/café/office floorspace and associated access and public realm works. This application only covers part of the site. As the capacity has been tested by the planning application, this capacity represents the optimum use for this part of the site allocation.</p> <p>The rest of the site has the potential to deliver non-residential uses to meet the site requirement. There is a live application currently on the rest of the site allocation, which if approved will deliver a non-residential scheme.</p>						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Planning application 18/AP/0900</b>	<b>Main Modifications to the NSP / indicative capacity</b>
		145	193	362	362 (905 student rooms)	362

**Site allocation:** NSP51 Land between St Thomas Street, Fenning Street, Melior Place, and Snowsfields

**Alternatives considered**

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. Taller buildings should be towards the west of the site and should not detract from the primacy of The Shard;
- The site is within the setting of the Grade II listed Railway Arches. The site includes an important unlisted building, The Leather Warehouse, which makes a positive contribution to the area. The site is also within the setting of the important unlisted Horseshoe Pub. Redevelopment should enhance the setting of these buildings. Development proposals should retain and enhance the townscape setting provided by key heritage assets and complement local character and distinctiveness. The urban grain and street layout of the surrounding area should be retained;
- The site lies partially within the Bermondsey Street Conservation Area;
- The site lies within the Background Assessment Areas of LVMF views 3A.1 and 2A.1 – Parliament Hill Summit to St Paul’s Cathedral and Kenwood Viewing Gazebo to St Paul’s Cathedral;
- The site benefits from Tier 1 Archaeological Priority Area (APA) Tier 1 designation. The site is located in APA1 North Southwark and Roman Roads. Significant archaeological remains are known within the immediate area;
- The site is in London Bridge District Town Centre;
- The site is in the Central Activity Zone;
- The site is in Bankside, Borough and London Bridge Opportunity Area; and
- The site is in proximity to Melior Street Community Garden (Other Open Space).

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, listed buildings, heritage assets, archaeology, town centre, central activity zone, opportunity area, open space, and views 3A.1 and 2A.1 – Parliament Hill Summit to St Paul’s Cathedral and Kenwood Viewing Gazebo to St Paul’s Cathedral. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / minimum capacity
		254	121	121	254	121

<b>Site allocation:</b> NSP52 Colechurch House, London Bridge Walk						
Alternatives considered						
The site allocation is intended for office redevelopment with town centre uses (A1, A2, A3, A4, D1, D2) at the ground floor level. Therefore, no residential capacity has been provided across different iterations of the plan for this site allocation.						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP</b>
		N/A				

<b>Old Kent Road sites</b>
NSP53 Bricklayers Arms
NSP54 Crimscott Street and Pages Walk
NSP55 Mandela Way
NSP56 107 Dunton Road (Tesco store and car park) and Southernwood Retail Park
NSP57 Salisbury estate car park
NSP58 96-120 Old Kent Road (Lidl store)
NSP59 Former petrol filling station, 233-247 Old Kent Road
NSP60 Kinglake Street Garages
NSP61 4/12 Albany Road
NSP62 Former Southern Railway Stables
NSP63 Land bounded by Glengall Road, Latona Road and Old Kent Road
NSP64 Marlborough Grove and St James's Road
NSP65 Sandgate Street and Verney Road
NSP66 Devon Street and Sylvan Grove
NSP67 Hatcham Road and Penarth Street and Ilderton Road
NSP68 760 and 812 Old Kent Road (Toyrus store) and 840 Old Kent Road (Aldi store)
NSP69 684-698 Old Kent Road (Kwikfit garage)
NSP70 636 Old Kent Road

**Site allocation: NSP 53 (OKR1) Bricklayers Arms Roundabout**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP53 (OKR1) could potentially come forward in Phase 2 (these are subject to review as we monitor actual delivery rates).

This site has no planning permission or pending applications relating to it and no masterplan has been produced. This site allocation is considered important to redevelopment of the Old Kent Kent Road and although several options have been proposed its capacity remains unclear. It is expected that this site may come forward for re-development in Phase 2. TFL have expressed positivity towards the inclusion of the site as an allocation.

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	Dependent on land available	Dependent on BLE option	Unknown

**Site allocation: NSP 54 (OKR2) Crimscott Street and Pages Walk**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP57 (OKR5) would fall outside of the phasing because a planning application 19/AP/1506 has been approved and this site is located further away from the A2 bus corridor.

The first draft OKR AAP (2016) indicated this site could have a capacity for 760 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP.

Since the AAP (2016) was published, numerous planning applications have been submitted and approved on the Phase 1 part of this site. A residential development at Marshall House has already delivered 82 homes. There is a large mixed use scheme currently under construction on the Rich Estate which will deliver 406 homes, expected to be completed in 2023. Current approvals are 64 homes and live applications are a further 8 homes, bringing the total to 560 homes. Therefore, there is capacity on this site for an additional 200 homes. These reflect the potential capacity consistent with the high option scenario.

The latest draft of the AAP (December 2020) indicates that the site could have capacity for 760 homes which is consistent with the high option. Any higher options would need to consider existing character, townscape, heritage assets, protected views and the archaeological priority area. A lower option may not optimise the use of the site.

The following constraints were considered for this site:

- The site includes part of Grade II listed buildings 44 and 45 Grange Road.
- The site is within the setting of the Pages Walk and Bermondsey Street Conservation Areas.
- Part of the site lies within the Background Assessment Area of LVMF view 3A.1 from the Kenwood viewing gazebo to St Paul's Cathedral.
- Part of the site falls within the Borough View of St Paul's Cathedral from Nunhead Cemetery.
- The site is in proximity of the Scheduled Ancient Monument the Bermondsey Abbey Buildings.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020 / minimum
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							<b>capacity</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	760 homes	760 homes	760 homes

**Site allocation: NSP 55 (OKR3) Mandela Way**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP55 (OKR3) would fall within Phase 2 as there are currently no planning applications relevant to this site (this is subject to review as we monitor actual delivery rates).

The first draft OKR AAP (2016) indicated this site could have a capacity for 2420 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP. It was indicated that the site had the slightly lower capacity for 2200 homes.

The latest draft AAP (December 2020) indicates that the site could have a capacity of 1,955 which took the lower end of the range. This is due to an increase in industrial floorspace. Any higher options would need to consider existing character, townscape, heritage assets, protected views and the archaeological priority area. A lower option may not optimise the use of the site.

The following constraints were considered when masterplanning for this site. The impacts have been fully analysed in the Old Kent Road AAP evidence base:

- The site is within the setting of Grade II listed building The White House
- The site is partially within the Page's Walk Conservation Area
- Much of the site lies within the Background Assessment Area of LVFM view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster.
- Much of the site falls within the Borough Views of St Paul's Cathedral from Nunhead Cemetery and One Tree Hill.
- The site is in proximity of the Scheduled Ancient Monument the Bermondsey Abbey Buildings.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020 / minimum
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							<b>capacity</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	2,420 homes	2,200 homes	1,955 homes

**Site allocation: NSP 56 (OKR4) 107 Dunton Road (Tesco and Car Park) and Southernwood Retail Park**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP56 (OKR4) would fall within Phase 1 and Phase 2 (these are subject to review as we monitor actual delivery rates).

The first draft OKR AAP (2016) indicated this site could have a capacity for 1,055 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP and this capacity increased to 1,240.

Since the AAP (2016) was published, a planning application have been submitted and approved subject to s106 agreement on the Phase 1 part of this site (Southernwood Retail Park). Current approvals are 724 homes. There is currently ongoing discussions between the Council and the developer for the Tesco site which indicate that there is a potential for a further 882 homes.

The latest draft of the AAP (December 2020) indicates that the site could have capacity for 1,600 homes based on current approvals on the site and masterplanning work undertaken by Maccreanor Lavington. This site is required for one of the stations for the Bakerloo Line Extension.

The following constraints were considered when masterplanning for this site. The impacts have been fully analysed in the Old Kent Road AAP evidence base:

- The site is in close proximity of the Grade II listed Former Fire Station.
- The site is in close proximity to the Cobourg Road Conservation Area.
- Part of the site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster.
- Part of the site lies within the Borough View of St Paul's Cathedral from Nunhead Cemetery.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.
- The site is opposite the entrance to Burgess Park.

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020 / minimum capacity
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	1,055 homes	1,240 homes	1,600 homes

**Site allocation: NSP 57 (OKR5) Salisbury Estate Car Park**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP57 (OKR5) would fall within Phase 1 as a planning application 19/AP/1506 has been approved (these are subject to review as we monitor actual delivery rates).

Since the AAP (2016) was published, an application has come forward and been approved for 26 new homes on the site.

The latest draft OKR AAP (2020) indicates this site could have a capacity for 26 new homes. This reflects a slightly lower but not significant change from the potential capacity consistent with the high option scenario and the tall buildings and density strategy developed in the OKR AAP. As the capacity has been tested by planning applications, this capacity represents the optimum use of the site without having a detrimental impact on heritage assets and protected views.

The following constraints were considered when determining the application:

- The sites is adjacent to Grade II listed Lady Margaret Church.
- The site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster and LVMF view 1A.2 Alexandra Palace viewing terrace to St Paul's Cathedral.

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020 / minimum capacity
	Opportunity area	Opportunity	Opportunity area	Opportunity area	28 homes	28 homes	26 homes

	wide - 8,468 homes	area wide – 12,000 homes	wide - 13,658 homes	wide - 20,000 homes			
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<b>Site allocation: NSP 58 (OKR6) 96-120 Old Kent Road (Lidl store)</b>							
<b>Alternatives considered</b>							
<p>The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.</p> <p>The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP58 (OKR6) is expected to come forward within Phase 1 (these are subject to review as we monitor actual delivery rates).</p> <p>The first draft OKR AAP (2016) indicated this site could have a capacity for 115 new homes. The site boundary has been expanded in the NSP and the capacity has now been increased to 180. The latest draft OKR AAP (December 2020) indicates this site could have a capacity for 180 new homes.</p> <p>A 3 storey Victorian building which faces the street is identified as building of architectural and historic merit. There is currently no planning permission or pending applications for this site. Any higher options would need to consider existing character, townscape, heritage assets, protected views and the archaeological priority area. A lower option may not optimise the use of the site.</p> <p>The following constraints were also considered for this site:</p> <ul style="list-style-type: none"> <li>- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.</li> <li>- The site lies within the Background Assessment Area of LVMF view 23.1A from the centre of bridge over the Serpentine to the Palace of Westminster.</li> <li>- The site falls within the Borough View of St Paul’s Cathedral from One Tree Hill.</li> </ul>							
<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020 /</b>

							<b>minimum capacity</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	115 homes	140 homes	180 homes

<b>Site allocation: NSP59 (OKR7) Former petrol filling station, 233-247 Old Kent Road</b>							
Alternatives considered							
<p>The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.</p> <p>The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP59 (OKR7) would fall within Phase 1 as the site is currently under construction.</p> <p>The first draft OKR AAP (2016) indicated this site could have a capacity for 30 new homes. Since the AAP was published, a planning application, 18/AP/0928, has been submitted and approved on the Phase 1 part of this site, and is now under construction which will deliver 24 homes by 2021. As the capacity has been tested by planning applications, this capacity represents the optimum use of the site. The latest draft OKR AAP (December 2020) indicates this site could have a capacity for 24 new homes.</p>							
<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020 / minimum capacity</b>
	Opportunity area wide - 8,468	Opportunity area wide –	Opportunity area wide - 13,658	Opportunity area wide - 20,000	30 homes	24 homes	24 homes

	homes	12,000 homes	homes	homes			
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<b>Site allocation: NSP60 (OKR8) Kinglake Street Garages</b>							
Alternatives considered							
<p>The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates the Old Kent Road Opportunity Area for 12,000 homes and 5,000 jobs. As a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. This high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.</p> <p>The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP60 (OKR8) would deliver within Phase 1 as the site is currently under construction.</p> <p>The first draft OKR AAP (2016) indicated this site could have a capacity for 22 new homes. Since the AAP was published, a planning application has been submitted and approved, and is now under construction which will deliver 21 homes by 2023. As the capacity has been tested by planning applications, this capacity represents the optimum use of the site. The latest draft OKR AAP (December 2020) indicates this site could have a capacity for 24 new homes.</p>							
Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020 / minimum

							<b>capacity</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	22 homes	22 homes	21 homes

<b>Site allocation: NSP61 (OKR9) 4/12 Albany Road</b>
Alternatives considered
<p>The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.</p> <p>The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP61 (OKR9) is expected to come forward in Phase 2 (these are subject to review as we monitor actual delivery rates).</p> <p>The first draft OKR AAP (2016) indicated this site could have a capacity for 24 new homes. There is currently no planning permission or pending application for this site. Any higher options would need to consider existing character, townscape, heritage assets, protected views and the archaeological priority area. A lower option may not optimise the use of the site. The latest draft OKR AAP (December 2020) maintains that this site could have a capacity for 24 new</p>

homes.

The following site constraints must be considered by any application for redevelopment of this site:

- The site is in close proximity of the Grade II listed former Fire Station on Shorncliffe Road. The unlisted Thomas A. Beckett Pub adjacent to the site is of architectural and historic interest.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.
- The site lies within the Borough View of St Paul's Cathedral from Nunhead Cemetery.

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020 / minimum capacity
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	24 homes	24 homes	24 homes

**Site allocation: NSP 62 (OKR12) Former Southern Railway Stables**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP62 (OKR12) is expected to come forward in Phase 1 (these are subject to review as we monitor actual delivery rates).

A feasibility study was undertaken by Makower Architects in 2018 which indicated the site could allocate 103 homes and 765m<sup>2</sup> of workspace suitable for B class employment uses. The site is expected to come forward as one holding for redevelopment.

The following constraints have been considered when masterplanning for the site. The impacts have been fully analysed in the Old Kent Road AAP evidence base:

- The unlisted former Southern Railway Stables, horse hospital and the forge are identified as buildings of architectural and historic interest and are subject to an Article 4 Direction.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.
- The site includes land designated as other open space but is not currently accessible.

The latest draft of the AAP (December 2020) indicates that the site could deliver up to 103 homes consistent with the masterplan and the high option.

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020 / indicative capacity</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	n/a	119 homes	103 homes

**Site allocation: NSP63 (OKR10) Land bounded by Glengall Road, Latona Road and Cantium Retail Park**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result

of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The first draft OKR AAP (2016) indicated this site could have a capacity for 3,170 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP. The Cantium Retail Park Local Development Study 2018 (Patel Taylor) provided further testing and modelling. This ongoing work informed the capacity in the second draft OKR AAP (2017) which indicated this site could have a capacity for 4,200 homes.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP63 (OKR10) would fall within Phase 1 and Phase 2 (these are subject to review as we monitor actual delivery rates).

Since the AAP (2016) was published, numerous planning applications have been submitted and approved on the Phase 1 part of this site. Current approvals are 3,133 homes and live applications are a further 456 homes (3,589 total). These reflect the potential capacity consistent with the high option scenario and the tall buildings and density strategy developed in the OKR AAP.

The latest draft OKR AAP (December 2020) indicates this site could have a capacity for 4,800 homes consistent with the masterplan and the high option. This takes into account current approvals on the site.

The following constraints have been considered when masterplanning for the site. The impacts have been fully analysed in the Old Kent Road AAP evidence base:

- The site includes the Grade II listed mural depicting the history of Old Kent Road and is in proximity of Grade II listed buildings on Glengall Road. The site contains buildings and features of townscape merit and two chimneys of historic interest.
- The site is within the setting of the Glengall Road Conservation Area
- The western part of the site lies within the Borough View of St Paul's Cathedral from One Tree Hill.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020 / minimum capacity
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	3,170 homes	4,200 homes	4,800 homes

**Site allocation: NSP64 (OKR11) Marlborough Grove and St James's Road**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP64 (OKR11) would fall within Phase 1 and Phase 2 (these are subject to review as we monitor actual delivery rates).

The first draft OKR AAP (2016) indicated this site could have a capacity for 1095 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP. Since the AAP (2016) was published, a planning application has been submitted and approved subject to s106 agreement on the Phase 1 part of this site. Current approvals are equivalent to 100 homes (student housing) and live applications are for a further 15 homes.

The latest draft OKR AAP (2020) indicates this site could have a capacity for 1,200 new homes consistent with the high option.

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020 / minimum capacity</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	1,095 homes	1,012 homes	1,200 homes

**Site allocation: NSP 65 (OKR13) Sandgate Street and Verney Road**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP65 (OKR13) would fall within Phase 1 and Phase 2 (these are subject to review as we monitor actual delivery rates).

The first draft OKR AAP (2016) indicated this site could have a capacity for 3045 new homes. The site boundary was smaller at OKR13 and larger at the adjacent site OKR18 in 2016. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP. A feasibility study by Stitch Architects in 2018 indicated a capacity of 3754 new homes for the site.

Since the AAP was published, numerous planning applications have been submitted and approved on the Phase 1 part of this site. Current approvals are 1937 homes. Live applications indicate a further 57 homes, bringing a total of 1994 currently in planning homes to be delivered in Phase 1 of the site. These reflect the potential capacity consistent with the high option scenario and the tall buildings and density strategy developed in the OKR AAP.

The latest draft OKR AAP (2020) indicates this site could have a capacity for 5,300 homes consistent with the high option.

The following constraints have been considered when masterplanning for the site. The impacts have been fully analysed in the Old Kent Road AAP evidence base:

- The site includes the Grade II listed mural depicting the history of Old Kent Road and is in proximity of Grade II listed buildings on Glengall Road.
- The site contains buildings and features of townscape merit and two chimneys of historic interest.
- The site is within the setting of the Glengall Road Conservation Area.
- The western part of the site lies within the Borough View of St Paul’s Cathedral from One Tree Hill.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.
- The site is in proximity to Burgess Park and Surrey Canal (designated Metropolitan Open Land)

Options considered summary	Low option	London Plan Option	Medium option	High option	OKR AAP 2016	OKR AAP 2017	OKR AAP 2020 / minimum capacity
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	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	3,045 homes	3,680 homes	5,300 homes
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**Site allocation: NSP 66 (OKR18) Devon Street and Sylvan Grove**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP66 (OKR18) would fall within Phase 1 and Phase 2 (these are subject to review as we monitor actual delivery rates).

The first draft OKR AAP (2016) indicated this site could have a capacity for 1,390 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP and indicated the capacity for this site at 740 homes. The Local Development Study by Stinch in 2018 indicated a capacity of 149 homes for this site.

Since the AAP (2016) was published, numerous planning applications have been submitted on the Phase 1 part of this site. An affordable housing development has been completed delivering 80 homes. Application 19/AP/1239 was recently approved providing 565 homes. Live applications offer 219 further homes if approved.

Based on current permissions, pending applications and masterplanning work, the latest draft OKR AAP (2020) indicates this site could have a capacity for 1,500 homes. This reflects the high option and the tall buildings and density strategy developed in the OKR AAP.

The following constraints have been considered when masterplanning for the site. The impacts have been fully analysed in the Old Kent Road AAP evidence base:

- The site contains buildings of townscape merit.
- The site is in proximity to the Caroline Gardens Conservation Area.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020 / minimum capacity</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	1,390 homes	740 homes	1,500 homes



**Site allocation: NSP 67 (OKR16) Hatcham Road, Penarth Street and Ilderton Road**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP67 (OKR16) would fall within Phase 1 and Phase 2 (these are subject to review as we monitor actual delivery rates). The northern part of Ilderton Road is excluded from phasing as this is located closer to South Bermondsey station.

In the first draft OKR AAP (2016) this site was proposed as two allocations and indicated a combined capacity for 2310 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP. The site was brought forward as a single allocation indicating a capacity of 1460 new homes.

One application has been approved and built delivering 9 homes. Numerous other planning applications have been submitted and approved on the Phase 1 part of this site. Current approvals are 1,012 homes. There are currently no pending applications for the site, however, several developers and landowners are in discussions with the Council about redevelopment of various parts of the site.

Based on the current permissions and pending applications and masterplanning work, the latest draft OKR AAP (December 2020) indicates this site could have a capacity for 2,200 homes. This reflects the high option and the tall buildings and density strategy developed in the OKR AAP.

The following constraints have been considered when masterplanning for the site. The impacts have been fully analysed in the Old Kent Road AAP evidence base:

- The site contains some buildings of townscape merit and buildings of architectural and historic interest.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads
- The site is in proximity to South Bermondsey Railway Embankments (Borough Open Land) at the north end of the site.

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020 / minimum capacity</b>
	Opportunity area wide - 8,468	Opportunity area wide –	Opportunity area wide - 13,658	Opportunity area wide - 20,000	1,285 and 1,025 homes	1,460 homes	2,200 homes

	homes	12,000 homes	homes	homes	(2,310)		
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<b>Site allocation: NSP 68 (OKR17) 760 and 812 Old Kent Road (ToysRUs) and 840 Old Kent Road (Aldi)</b>							
<b>Alternatives considered</b>							
<p>The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.</p> <p>The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP68 (OKR17) would fall within Phase 1 and Phase 2 (these are subject to review as we monitor actual delivery rates).</p> <p>In the first draft OKR AAP (2016) this site was proposed as two allocations and indicated a combined capacity for 740 new homes. In preparing the next draft of the AAP (2017) further urban design work was undertaken which resulted in a more detailed masterplan and capacity modelling for specific site allocations in the AAP. The site was brought forward as a single allocation indicating a capacity of 1700 new homes.</p> <p>Since the AAP (2016) was published, a planning application has been submitted and approved subject to s106 agreement on the Phase 1 part of this site. Current approvals are 168 homes and live applications are a further 154 homes (Phase 2) (322 total). The latest draft OKR AAP (December 2020) indicates this site could have a capacity for 1,000 homes based on further masterplanning work. This reflects the high option and the tall buildings and density strategy developed in the OKR AAP.</p> <p>The site will be required for one of the new Bakerloo Line Extension stations.</p> <p>The following constraints have also been considered for the site:</p> <ul style="list-style-type: none"> <li>- The site is within proximity of the Grade II listed Licensed Victuallers Benevolent Institution (Caroline Gardens).</li> <li>- The site is in close proximity of the Caroline Gardens Conservation Area</li> <li>- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads</li> <li>- The site is in proximity to Brimington Park (Borough Open Land).</li> </ul>							
<b>Options considered</b>	<b>Low option</b>	<b>London Plan</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP</b>	<b>OKR AAP</b>	<b>OKR AAP</b>

summary		Option			2016	2017	2020 / minimum capacity
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	590 homes and 150 homes (740)	1,700 homes	1,000 homes

**Site allocation: NSP 69 (OKR15) 684-698 Old Kent Road (Kwikfit Garage)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows which parts of NSP69 (OKR15) would come forward in Phase 2 (these are subject to review as we monitor actual delivery rates).

The first draft OKR AAP (2016) indicated this site could have a capacity for 70 new homes. The AAP (2017) revised this to 65 homes. The latest draft OKR AAP (December 2020) maintains that this site could have a capacity for 65 new homes.

There is currently no planning permission or pending applications for this site. Any higher options would need to consider existing character, townscape, heritage assets, protected views and the archaeological priority area. A lower option may not optimise the use of the site.

The following site constraints must be considered by any application for redevelopment of this site:

- The site is adjacent to the Grade II listed Camberwell Public Library and Livesey Museum.
- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020 / minimum capacity</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	70 homes	65 homes	65 homes

**Site allocation: NSP 70 (OKR14)**

Alternatives considered

The capacity for this site was considered in the OKR Place Making Study 2016 (Allies and Morrison). The study considered high, medium and low options for development based on a Bakerloo Line (2 station, high density scenario) option, a Bakerloo Line (1 or 2 stations, medium scenario) and a no Bakerloo Line extension option (low scenario). This was based on indicative massing. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The medium scenario indicated a potential total capacity of 13,658 units and the low option indicated 8,468 units. The Old Kent Road AAP Integrated Impact Assessment explains these options in more detail. The London Plan designates OKR OA for 12,000 homes and 5,000 jobs and as a result of the detailed masterplan and preparation of the AAP we have increased this to 20,000 homes and 10,000 jobs over 20 years. The high option was considered the most appropriate option with up to 20,000 homes across the opportunity area, significantly exceeding the target set out by the regional plan.

The Bakerloo Line extension has not yet been confirmed therefore the Council has agreed with the Mayor around 9,500 homes could come forward prior to the confirmation of the BLE (Phase 1) across the whole opportunity area. The remaining 10,500 homes would be delivered in Phase 2 (upon letting of the construction contract for the BLE). The phasing plan shows that NSP70 (OKR14) would be delivered within Phase 1.

The first draft OKR AAP (2016) indicated this site could have a capacity for 22 new homes. A planning application, 17/AP/1646, came forward in 2017 indicating a capacity of 42 homes. This has been approved and is currently under construction, due to be completed by 2023. As the capacity has been tested by a planning application, this capacity represents the optimum use of the site. The latest draft OKR AAP (December 2020) maintains that this site could have a capacity for 42 new homes.

The following constraints were considered when determining the application:

- The site benefits from Tier 1 APA (Archaeological Priority Area) designation. Located in APA1 – North Southwark and Roman Roads.

<b>Options considered summary</b>	<b>Low option</b>	<b>London Plan Option</b>	<b>Medium option</b>	<b>High option</b>	<b>OKR AAP 2016</b>	<b>OKR AAP 2017</b>	<b>OKR AAP 2020 / minimum capacity</b>
	Opportunity area wide - 8,468 homes	Opportunity area wide – 12,000 homes	Opportunity area wide - 13,658 homes	Opportunity area wide - 20,000 homes	22 homes	42 homes	42 homes

Peckham Sites
NSP71 Aylesham Centre and Peckham Bus Station
NSP72 Blackpool Road Business Park
NSP73 Land between the railway arches (East of Rye Lane including railway arches)
NSP74 Copeland Industrial Park and 1-27 Bournemouth Road

**Site allocation:** NSP71 Aylesham Centre and Peckham Bus Station

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Redevelopment or refurbishment of the site should introduce active frontages throughout the site, and retain and enhance frontages to Rye Lane, taking Rye Lane Peckham conservation area into consideration;
- Currently there is poor access to Peckham High Street and Queens Road due to the location of the bus station. Redevelopment should maximise opportunities to improve links across the site, provide new civic space and connect to the existing road and public realm layout, while retaining bus station provision on the site if that use is still required;
- If the bus garage is required redevelopment should consider over the station development to provide new homes;
- Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. Assessment of the site in the Peckham and Nunhead Area Action Plan (PNAAP 26) concluded that development of up to 20 storeys could be appropriate in this location. The site is within the setting of Rye Lane Peckham and Peckham Hill Street conversation areas, so any taller development should be set back from the Rye Lane shopping frontage, towards the eastern end of site, to mitigate its impact. Development massing should be directed to the east of the site to minimise impact on the view to the City from the Bussey Building rooftop. In any case a 20 storey height restriction on development proposals should be observed to conform with guidance set out in the Peckham and Nunhead Area Action Plan. Careful consideration would also need to be given to the neighbouring residential areas and important local heritage buildings;
- The site is within the setting of Grade II listed Rye Lane Chapel and a group of listed buildings on Highshore Road. The site is also within the setting of a number of important unlisted buildings on Peckham High Street and Rye Lane, including Jones and Higgins Clock Tower and 43-49 Rye Lane;
- The site falls partially within the Rye Lane Peckham Conservation Area;
- The site lies within the Borough View of St Paul's Cathedral from One Tree Hill;
- The site impacts Tier 2 Archaeological Priority Area designation. The site is located in APA4 - Peckham Village. Archaeological investigations have taken place on this site and revealed multi-phase archaeological deposits (predominantly prehistoric in date);
- The site is in Peckham Major Town Centre; and
- The site lies within the Peckham and Nunhead Action Area;

The optimum development capacity was arrived at using the sites methodology approach. The capacity of this site has been increased during different iterations of the plan to more appropriately reflect the capacity of the site and optimise the use of this. Any proposals for a higher option would need to consider the existing character, townscape, listed buildings, heritage assets, conservation area, Borough View of St Paul's Cathedral from One Tree Hill, archaeology, town centre and action area. A lower option may not optimise the use of the site.

A lower capacity should be used if the figure is expressed as a minimum for this site rather than indicative and this has been updated accordingly.

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP / minimum capacity</b>
		400	645	850	850	700

**Site allocation:** NSP72 Blackpool Road Business Park

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. Buildings of merit were assumed to be retained. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Redevelopment of the site should support the provision and implementation of the Peckham Coal Line;
- Commercial uses and taller buildings should be concentrated towards the north of the site;
- The site is in proximity of important undesignated heritage assets such as the railway viaduct and the site contains the Old Mill Building at 72 Copeland Road, which is of local interest. Other Victorian heritage assets on the site may be retained and enhanced, including former industrial buildings;
- The site lies between the Nunhead Green and Rye Lane Peckham Conservation Areas;
- Although the site is in not in an Archaeological Priority Area, an archaeological assessment will be required for the large site which lies close to the site of the Camberwell Workhouse; and
- The site lies within the Peckham and Nunhead Action Area.

The optimum development capacity was arrived at using the sites methodology approach. Any proposals for a higher option would need to consider the existing character, townscape, conservation area, undesignated heritage assets, archaeological deposits and action area. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		Not included	279	250	279	250

<b>Site allocation:</b> NSP73 Land between the railway arches (East of Rye Lane including railway arches)						
Alternatives considered						
This site allocation is set out in the adopted Peckham and Nunhead Area Action Plan (2004) as 'PNAAP 3: Land between the railway arches (East of Rye Lane including railway arches)'. It is intended for mixed use development with small scale businesses, cultural, leisure and retail uses. Therefore, no residential capacity has been provided across different iterations of the plan for this site allocation.						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP</b>
				N/A		

**Site allocation:** NSP74 Copeland Industrial Park and 1-27 Bournemouth Road

**Alternatives considered**

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. Buildings of merit were assumed to be retained. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Opportunities to improve and extend links west to Rye Lane and north-south through the railway arches should be explored. Opportunities to create improved public realm and a possible public square/space within the site should be maximised;
- Development should provide a north-south link through the railway arches to the north and linking development sites which will provide further relief to Rye Lane;
- The site's central town centre location provides an opportunity for a taller landmark building of up to 15 storeys towards the east of the site, to identify the regeneration of the site and provide a point of reference for people within the town centre. If a taller building is to be built on this site, careful consideration must be given to the Rye Lane Peckham Conservation Area which covers the northern part of the site, and the Bussey building;
- The site contains undesignated heritage assets the Bussey building and 135 Rye Lane;
- The site lies partially within the Rye Lane Peckham Conservation Area. Development on this site should conserve and enhance its heritage setting;
- The site lies within the Borough View of St Paul's Cathedral from One Tree Hill;
- Although the site is not in an Archaeological Priority Area (APA), the site is over 0.5 ha and it should be acknowledged as a tier 4 designation within the APA tier system. An archaeological assessment is required as the first stage of archaeological mitigation for this large site;
- It is in Peckham Major Town Centre;
- The site lies within the Peckham and Nunhead Action Area; and
- The site can contribute to Peckham Coal Line.

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, listed buildings, undesignated heritage assets, conservation area and Borough View of St Paul's Cathedral from One Tree Hill, town centre and action area. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / minimum capacity
		268	270	270	480	270

<b>Rotherhithe Sites</b>
NSP75 Rotherhithe Gasometer
NSP76 St Olav's Business Park, Lower Road
NSP77 Decathlon Site and Mulberry Business Park
NSP78 Harmsworth Quays, Surrey Quays Leisure Park, Surrey Quays Shopping Centre and Robert's Close
NSP79 Croft Street Depot

**Site allocation:** NSP75 Rotherhithe Gasometer

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. Buildings of merit were assumed to be retained. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- A new green link between Salter Road and Windrose Close will provide access to Canada Water town centre and the woodland to the south of the development site;
- Development should be set back from the mature trees on Brunel Road;
- The site includes an undesignated gas container which is recognised across London as heritage assets and appropriate safeguards are required for their preservation and/or recording. Consideration should be given to the potential for innovative design solutions such as retention of the gasometer; The site is in proximity of Grade II listed Surrey Lock;
- The site is benefits from Archaeological Priority Area (APA) Tier 1 designation - North Southwark and Roman Roads;
- The site is in Canada Water Opportunity Area; and
- The site is in proximity to Deal Porters Walk (Borough Open Land) and within the setting of the undesignated heritage asset Surrey Water Basin (Open Water Space).

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, undesignated heritage assets, archaeological priority area, mature trees, opportunity area, designated open space and open water space. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / minimum capacity
		137	155	160	182	160

**Site allocation:** NSP76 St Olav's Business Park, Lower Road

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- The site should comprehensively developed to include both St Olav's Court and City Business Centre on each side of Lower Road;
- The site is in proximity of Grade II listed buildings the Rotherhithe War Memorial, St Olav's Church and the archway to Rotherhithe tunnel approach
- The site is within the setting of King Edward III Conservation Area;
- Part of the site lies within the LVMF view 5A.2 Greenwich Park Wolfe Statue to Tower Bridge and St Paul's Cathedral. On the western edge of the site development should respect the LVMF view avoiding any incursion into the Landmark Viewing Corridor including its Wider Setting Consultation Area and respecting the setting of St Olaf Church;
- The site is located outside of an Archaeological Priority area, but important archaeological deposits have been recorded in this area. The site is also over 0.5ha and as a result should be acknowledged as a tier 4 designation within the Archaeological Priority Area (APA) tier system. An archaeological assessment of this large site is required to assess archaeological significance;
- The site is in Canada Water Opportunity Area; and
- The site boundary is in proximity to Christopher Jones Square (Other Open Space) and Southwark Park (Metropolitan Open Land).

The optimum development capacity was arrived at using the sites methodology approach. The capacity of this site has been increased during different iterations of the plan to more appropriately reflect the capacity of the site and optimise the use of this. Any proposals for a higher option would need to consider the existing character, townscape, conservation area, view 5A.2 Greenwich Park Wolfe Statue to Tower Bridge and St Paul's Cathedral; Landmark Viewing Corridor including its Wider Setting Consultation Area and respecting the setting of St Olaf Church; archaeology, opportunity area and open space. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / indicative capacity
		73	62	125	125	125

<b>Site allocation:</b> NSP77 Decathlon Site and Mulberry Business Park						
Alternatives considered						
<p>The capacity has been determined by planning application 12/AP/4126 and 13/AP/1429. As the capacity has been tested by a planning application, this capacity represents the optimum use of the site. Within this table the different options considered during the plan making process are also presented. The Decathlon site, previously known as Site C and E along Surrey Quays Road, forms the southern part of the site allocation. An outline application for a comprehensive redevelopment on the plot (Ref: 12/AP/4126) was approved with legal agreement in 2013. As set out in the officer report, the mixed use redevelopment will be delivered in four phases over approximately eight years. Phase 1 has been completed, delivering 234 residential units and town centre uses in 2019. The site for Phase 2, 3 and 4 has been sold and the new owners have been in discussion with the council through a Statement of Common Ground about the future use and development of the site which could result in the reduction of 796 units coming forward on the site and increasing the employment provision. Therefore the remaining delivery has been included in 6-15 years and the housing requirement is changed to a 'should' requirement and the capacity remains as indicative. The Mulberry Business Park forms the northern part of the site allocation. The full application (Ref: 13/AP/1429) was approved with legal agreement in 2013 for student housing-led mixed use development, including 33 affordable residential units. With London Plan setting out non-conventional housing as part of housing supply, the 770 student rooms will provide an equivalent of 308 residential units on the 2.5:1 ratio. The scheme in total provides 341 residential units.</p>						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Approved applications 12/AP/4126 and 13/AP/1429</b>	<b>Main Modifications to the NSP / indicative capacity</b>
		N/A: The site boundary has been substantially revised with plots re-coordinated with NSP 78		1,371	1,371	1,371

<b>Site allocation:</b> NSP78 Harmsworth Quays, Surrey Quays Leisure Park, Surrey Quays Shopping Centre and Robert's Close						
Alternatives considered						
The capacity has been determined by planning application 18/AP/1604. As the capacity has been tested by a planning application, this capacity represents the optimum use of the site.						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Approved application: 18/AP/1604</b>	<b>Main Modifications to the NSP / minimum capacity</b>
		N/A: The site boundary has been substantially revised with plots re-coordinated with NSP 77		2,000 - 3995	2,000 – 3,995	2,000 – 3,995

**Site allocation: NSP79 Croft Street Depot**

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Development should provide active edges onto Croft Street whilst retaining and protecting the street trees on Croft Street;
- Development should consider potential road alterations on Lower Road that may narrow the Croft Street junction and introduce a two-way segregated cycle track across the mouth of Croft Street; and
- Although the site is not located in an Archaeological Priority Area, a Roman coin hoard was reported from Chilton Grove nearby.

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape and archaeological deposits. A lower option may not optimise the use of the site.

<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Higher option</b>	<b>Main Modifications to the NSP / indicative capacity</b>
		Not included	56	56	94	56

<b>Walworth Sites</b>
NSP80 Morrison's, Walworth Road
NSP81 330-344 Walworth Road
NSP82 Chatelaine House, Walworth Road

**Site allocation:** NSP80 Morrison's, Walworth Road

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Redevelopment should enable the Low Line walking route and enhance accessibility to bus stops and the existing cycle network;
- The site is within proximity of Grade II listed building Manor Place Baths and 33 Penrose Street and buildings of townscape merit along Walworth Road. It adjoins the important undesignated heritage asset of the railway viaduct to the rear. The site is within the Walworth Heritage Action Zone (HAZ);
- The site lies within the Walworth Road Conservation Area;
- The site lies just outside of the Borough View of St Paul's Cathedral along Camberwell Road;
- The site benefits from Tier 2 Archaeological Priority area (APA) designation. The site is located in APA2 - Walworth Village;
- The site is in Elephant and Castle Major Town Centre; and
- The site is in Elephant and Castle Opportunity Area.

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, listed buildings, undesignated heritage assets, heritage action zone, opportunity area, town centre, conservation area and archaeological priority area. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / minimum capacity
		150	129	129	150	129

**Site allocation:** NSP81 330-344 Walworth Road

Alternatives considered

The capacity for this site was considered using the sites methodology approach. This involved council officers assessing potential building footprints on each site allocation that made an efficient use of land and responded to their context. The council officers then estimated the notional massing, i.e. number of storeys, which could be achieved on each building footprint to generate a total Gross External Area (GEA) for the site. This process was iterative, with each site appraised separately by multiple officers before agreeing the final parameters. The final figures are based on mid-points between the assumptions made in individual officer assessments.

No master planning work was commissioned by the council for this site. The following site constraints were considered for this site:

- Redevelopment should provide active frontages at ground floor level;
- Redevelopment should support delivery of the Low Line, access to the Southwark Spine cycle network, and enhanced access to walking routes;
- The site is in proximity to Grade I listed Church of St Peter, Grade II listed buildings on Sutherland Square and Liverpool Grove, and within the setting of buildings of townscape merit. The site is within the Walworth Heritage Action Zone (HAZ);
- The site lies within the Walworth Road Conservation Area;
- The site partially lies within the Borough View of St Paul's Cathedral along Camberwell Road;
- The site is not within a borough designated Archaeological Priority Area but an archaeological assessment is required for this large site;
- The site is in Elephant and Castle Major Town Centre; and
- The site is in Elephant and Castle Opportunity Area.

The optimum development capacity was arrived at using the sites methodology approach. A higher option was considered for this site and not taken forward. Any proposals for a higher option would need to consider the existing character, townscape, listed buildings and buildings of townscape merit, heritage action zone, Borough View of St Paul's Cathedral along Camberwell Road, town centre, opportunity area, conservation area and archaeology. A lower option may not optimise the use of the site.

Options considered summary (residential units)		NSP Preferred Option	NSP PSV	Proposed changes to the Submitted NSP	Higher option	Main Modifications to the NSP / minimum capacity
		43	46	46	100	46

<b>Site allocation:</b> NSP82 Chatelaine House, Walworth Road						
Alternatives considered						
The capacity has been determined by planning application 13/AP/1122. As the capacity has been tested by a planning application, this capacity represents the optimum use of the site. Within this table the different options considered during the plan making process are also presented.						
<b>Options considered summary (residential units)</b>		<b>NSP Preferred Option</b>	<b>NSP PSV</b>	<b>Proposed changes to the Submitted NSP</b>	<b>Approved application 13/AP/1122</b>	<b>Main Modifications to the NSP / minimum capacity</b>
		54	95	54	54	54

## Appendix 12a

### 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 roadspace
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**

<b>Key spatial issue</b>	<b>Reasonable alternatives considered and appraised</b>
<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</p>

	<p>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>	<p>Policy covered by student housing, requiring the same provision of affordable housing.</p> <p>Reliance on the London Plan 2021.</p> <p>New policy specifically for development for co-living / purpose built shared living with specific affordable housing requirements (chosen option).</p>
<b>Build to rent</b>	<p>All new development could be build to rent with no provision of affordable housing</p> <p>All new development could be build to rent with 35% provision of affordable housing</p> <p>All new development of 100 units or more could be build to rent providing the 35% affordable housing (chosen option)</p> <p>All new development of 100 units or more could be build to rent with no provision of affordable housing</p>
<b>Housing tenure</b>	<p>Consider requiring a higher requirement of intermediate housing on development</p> <p>Consider requiring a higher requirement of social rented housing on development</p> <p>Borough wide requirement of 25% social rented and 10% intermediate housing with the exception of Aylesbury Action Area Core (chosen option).</p>
<b>Family homes</b>	<p>Continue with the same percentages of family homes based on density</p> <p>Increase the percentage of family homes in the Central Activities Zone.</p> <p>Continue with the same percentage of family homes in the CAZ at 20% (chosen option)</p> <p>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).</p> <p>Increase the percentage of family homes in the Urban Zone to 25% (chosen option).</p> <p>Reduce the percentage of family homes in Old Kent Road.</p> <p>Family housing should be two bed</p> <p>Family housing should be three bed (chosen option)</p> <p>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)</p>
<b>Housing for older people</b>	<p>Require affordable housing for developments of new specialist housing for older people (chosen option)</p> <p>Do not require affordable housing for developments of new specialist housing for older people</p>

	<p>Allow specialist housing for older people anywhere in the borough</p> <p>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)</p>
<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</p>

	<p>relocation)</p> <ul style="list-style-type: none"> <li>- Extend South Bermondsey SPIL to include railway arches (NSP submission) <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> </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</p>

	<p>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 at 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>	<ol style="list-style-type: none"> <li>1. Plan for development options in Old Kent Road without the Bakerloo Line Extension</li> <li>2. Prepare an Area Action Plan for Old Kent Road to include strategic infrastructure improvements and promote the Bakerloo Line extension (chosen option)</li> </ol>
<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.

# **Main Modifications to the New Southwark Plan**

## **Integrated Impact Assessment**

### **Appendix 13 Evolution of Policy**

**In addition to the options presented below, the development of the policies within the New Southwark Plan and the justification for their evolution is set out within the following Background Papers:**

- **Industrial Background Paper**
- **Housing Background Paper**
- **Offices Background Paper**
- **Retail Background Paper**

<b>Policy</b>	<b>NSP Options</b>	<b>NSP Preferred Option</b>	<b>NSP Proposed Submission Version</b>	<b>NSP Amended Policies</b>	<b>NSP Submission</b>	<b>NSP Main Modifications</b>
<b>P25 P28 Strategic Protected Industrial Land</b>	Policy DM20: Considering the approach to reviewing the PILs in light of preparing the evidence base. Consideration of the change of mixed use neighbourhoods.	Policy DM23: All local and strategic PIL proposed to transition to mixed use neighbourhoods.	Policy P25: Retained SPIL at South Bermondsey and IWMF, OKR Proposed new SPIL at Admiral Hyson Trading Estate.	Deletion of Old Jamaica Road as a site allocation and designated as SPIL  Minor amendment to gasworks/IWMF SPIL boundary.  Proposed Mandela Way, land west of Ossory Road and Hatcham/Ildert on Road as LSIS.	Extended South Bermondsey SPIL to cover railway arches.  Updated reasons in policy P28 to give further clarification on SPIL release/co-location policy.	Policy updated to align with changes to the Use Classes Order (September 2020)  Conditions proposed in order to secure industrial uses.
<b>Policy P26 P29 Office and business development</b>	Policy DM21: Requiring no loss of B class floorspace in the CAZ, opportunity areas, town centres, core action areas, strategic cultural areas. Supporting office growth.	Policy DM24: Retain or increase B class uses in regeneration areas.	Policy P26 as currently drafted.	No proposed changes.	No material changes.	Policy updated to align with changes to the Use Classes Order (September 2020)  Conditions proposed in order to secure employment uses.

<b>Policy P27 P33Railway arches</b>	Policy DM22: Supportrange of uses in railway arches outside the PILs, review arches within PIL review, support walking and cycling routes.	Policy DM25: Supporta range of uses in railway arches.	Policy P27 as currently drafted.	No proposed changes.	No material changes.	Policy updated to align with changes to the Use Classes Order (September 2020)
<b>Policy P38 P32 Business Relocation</b>	No policy.	No policy.	Policy P38 as currently drafted.	No proposed changes.	No material changes. Some wording improvements suggested through consultation.	No changes.

## Evolution of policy

**Table 2:** evolution of the New Southwark Plan Policy SP1 – Homes for All

This Table has been updated to include the Council's Proposed Changes to the Submitted Plan 2020 and the Main Modifications to the Plan 2021.

Policy	NSP Options Version (2014)	NSP Preferred Options Version (2015)	NSP Proposed Submission Version (2017)	NSP Amended Policies (2019)	NSP Submission (2019)	NSP Council's Proposed Changes to the Submitted Plan (2020)	NSP Main Modifications to the Plan (2021)
SP1	Variety of homes for people on different incomes – rent and part ownership that people can afford	We will build 11,000 new council homes by 2043 by developing our own land and developing on some of our existing estates, including in-fill development.	We will endeavour to secure 50% of all new homes as affordable homes. This will be achieved through building 11,000 new council homes by 2043 by developing our own land and developing on some of our	N/A	Policy reworded, including further ways about how we are going to reach our 50% target of affordable housing delivery in the borough. Reasons reworded, including figures updated.	Policy updated to clearly set out the annual housing target for the borough.  In addition to this a Housing Trajectory was prepared and added to the policy to set out the expected supply and source of this supply for each financial year. The reasons	Policy name updated to Homes for All to reflect the updated Borough Plan.  Policy also updated to reflect housing delivery targets for the full plan period.  Other additions to the policy include the support for small

			existing estates, including in-fill development.			were also updated to highlight deprivation levels in the borough.	sites and requiring sustainable design.  The Housing Trajectory was also updated to reflect the updated Plan period.
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## Evolution of policy

**Table 7:** evolution of the New Southwark Plan Policy P1 – social and intermediate housing

This Table has been updated to include the Council’s Proposed Changes to the Submitted Plan 2020 and the Main Modifications to the Plan 2021.

Policy	NSP Options Version (2014)	NSP Preferred Options Version (2015)	NSP Proposed Submission Version (2017)	NSP Amended Policies (2019)	NSP Submission (2019)	NSP Council’s Proposed Changes to the Submitted Plan (2020)	NSP Main Modifications to the Plan (2021)
P1	DM2 - Requires as much affordable housing as financially viable on developments of 10 or more units. Requires a minimum of 35% affordable housing on development with 15 or more units. Schemes of 10, 11, 12, 13 or 14 units to provide specific amount of affordable units.	DM1 - A minimum of 35% affordable housing where at least 70% of the affordable housing is social rent and up to 30% is intermediate where developments provide 10 or more homes (unless set out in an Area Action Plan). Affordable	P1 - Sets a requirement of 35% affordable housing on schemes that creates 11 or more homes. Developments that create 10 homes or less must provide the maximum viable amount towards the delivery of new council homes. Sets an affordable	P1 - Policy renamed. New note on affordable housing added. Introduced the fast track route for applications if 40% affordable housing is proposed, whereby a viability assessment is not required to	P1 - Policy reordered. Amendment to the social rented and intermediate housing threshold – developments of 10 homes or more to provide on site social rented and intermediate housing. Developments of 9 homes or	Policy update to state that developments providing 9 homes or more should provide affordable housing rather than 10. Amendment to Table 1 and further clarity around ensuring that the tenure breakdowns as set out in the policy are minimum requirements.	The policy has been amended to include the requirement for developments of between 6-9 homes to provide the maximum possible amount of social and intermediate housing. The policy specifies that schemes providing between 6-9 units can

	<p>Tenure split 70% social rented and 30% intermediate across majority of the requirement of 50% social rented and 50% intermediate is set for Elephant and Castle Opportunity Area and Peckham and Nunhead Action Area. Aylesbury Action Area requires 50% private and 50% affordable housing of which 75% should be social rented and 25% should be intermediate.</p>	<p>housing on site, if not, off-site then payment in lieu. Developments for nine or fewer homes to provide a financial contribution towards the delivery of council home. The value of the financial payment will be the difference in gross development value between a scheme providing the level of affordable housing required through DM1.1, and a fully private housing scheme.</p>	<p>housing requirement of 35% affordable housing with tenure split of 25% social rent and 10% of intermediate housing. All development that does not meet affordable housing requirements for viability reasons will be subject to viability reviews. Viability reviews must be published for public scrutiny. Affordable housing on site, if not, off-site then payment in lieu.</p>	<p>be submitted with the application. Reasons updated accordingly. Removed fact box on the affordable housing definitions</p>	<p>less to provide affordable housing contributions. Exceptions to the fast track route added. Reference added on 50% affordable housing to be provided on public sector land to follow the fast track route in the reasons. Text referring to affordable and market homes being of comparable size deleted. Note added under social rented and intermediate housing</p>	<p>Factbox also updated to clarify the types of housing products listed are social or intermediate homes</p>	<p>provide social rented and intermediate housing on site or as a payment in lieu. Further viability testing is being undertaken and the policy will be updated as required once the viability testing has been undertaken.</p>
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	<p>Require affordable housing to be delivered on-site, then off-site, then payment in lieu in exceptional circumstances.</p> <p>Tenure neutral development.</p>				<p>requirements table – setting our requirement for higher social rented housing. Figures updated in reasons. Housing fact box reinserted and revised.</p>		
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## Evolution of policy

**Table 17:** evolution of the New Southwark Plan Policy P4 – private rented homes

This Table has been updated to include the Council’s Proposed Changes to the Submitted Plan 2020 and the Main Modifications to the Plan 2021.

Policy	NSP Options Version (2014)	NSP Preferred Options Version (2015)	NSP Proposed Submission Version (2017)	NSP Amended Policies (2019)	NSP Submission (2019)	NSP Council’s Proposed Changes to the Submitted Plan (2020)	NSP Main Modifications to the Plan (2021)
P4	No specific policy. Factbox: We recognise that PRS can potentially help to meet the needs of Southwark residents who cannot afford to buy in Southwark and could provide high quality, longer-term rental accommodation.	DM4 – secured for the rental market for a minimum of 30 year term with tenancies which last a minimum of three years. Equivalent affordable housing to conventional housing schemes as per DM1.	Sets a threshold of more than 100 homes. Provide tenancies for private renters for a minimum of three years with a six month break clause. Be secured for the rental market for a minimum 30 year term.	Amendment – to provide affordable homes in accordance with P1 or Table 3 (social rent equivalent – 15%, Affordable rent at London Living Rent equivalent 20%) , subject to viability.	Note added under affordable housing table – setting our requirement for higher affordable rent capped at London Living Rent. However this is separate to our consideration of social rent in conventional housing which is	Amendment to clarify that a minimum of 35% affordable should be provided.  Amendment to Table 3 and further clarity around ensuring that the tenure breakdowns as set out in the policy are minimum requirements.	Minor modifications to Point 3 to state “All other Discount Market Rent homes must be allocated to households in accordance with on Southwark’s Intermediate Rent Housing list policy”

	<p>As yet we can see no evidence as to why PRS should be prioritised above other conventional or affordable housing. We therefore consider the provision of new affordable housing to be a priority for the borough and thus will continue to treat PRS as a form of market housing, eligible for affordable housing contributions.</p>		<p>Provide affordable homes in accordance with P1 or Table 3 (social rent equivalent – 12%, Affordable rent at London Living Rent equivalent 18%, Affordable rent for household incomes between £60,000 and £90,000 per year – 5%) , subject to viability. Sets a requirement to be subject to a viability review. Sets a requirement for</p>		<p>always our overall priority. In the reasons figures have been updated</p>		
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			the discount market rent homes at social rent equivalent to be marketed to households on Southwark's social housing waiting list.				
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## Evolution of policy

**Table 17:** evolution of the New Southwark Plan Policy P5 – Student Homes

This Table has been updated to include the Council’s Proposed Changes to the Submitted Plan 2020 and the Main Modifications to the Plan 2021.

Policy	NSP Options Version (2014)	NSP Preferred Options Version (2015)	NSP Proposed Submission Version (2017)	NSP Amended Policies (2019)	NSP Submission (2019)	NSP Council’s Proposed Changes to the Submitted Plan (2020)	NSP Main Modifications to the Plan (2021)
P5	<p>The Southwark Core Strategy (2011) Strategic Policy 8 – Student homes, sets out that development will meet the needs for student housing whilst balancing the building of student homes with other types of housing such as affordable and family housing.</p> <p>The Options</p>	<p>The policy evolved to require schemes providing direct let student rooms at market rent provide 35% of the GIA as conventional affordable housing, and 27% of student rooms let at a rent that is affordable to students.</p> <p>The policy also</p>	<p>Policy updated to clarify that affordable housing should be provided in line with P4 Private Rented Homes</p>	N/A	<p>Minor amendments to wording of policy and a new reason included to confirm affordable student rent is defined by the Mayor of London.</p> <p>Removal of point on bedroom sizes and indoor communal living space. Reason</p>	<p>Minor amendments made to the policy to clarify that the maximum level of affordable housing should be provided with a minimum of that being 35%.</p>	<p>Policy updated to replace the requirement of 10% of student homes to be wheelchair adaptable to 5% in line with national requirements.</p> <p>Policy also removed the requirement for nomination schemes to provide conventional affordable housing.</p>

	<p>version of the policy set out location criteria and required 35% of student housing must be affordable.</p>	<p>required schemes providing affordable student rooms for nominated further and higher institutions provide as much conventional affordable housing as is viable;</p> <p>Requirements around 10% wheelchair adaptable housing and adequate living space was also included.</p>			<p>added to clarify.</p> <p>Reason amended to refer to 'co-living'</p>		<p>The Main Modifications now include Policy P5a Purpose built shared living. As set out in EIP215, this was in response to suggested amendments made by the Inspectors during the Hearings.</p>
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**Table 4:** Southwark’s contribution to minor development’s affordable housing contribution

This section sets out how the policy requirement on minor development’s affordable housing contributions have evolved in policy P1

NSP Options Version (2014)	NSP Preferred Options Version (2015)	NSP Proposed Submission Version (2017)	NSP Amended Policies Version (2019)	NSP Submission Version (2019)	NSP Proposed Changes to the NSP (2020)	NSP Main Modifications (2021)
<p>(former policy DM2)</p> <p>Affordable housing on developments of 10 units or more only</p>	<p>(former policy: DM1)</p> <p>Developments for 9 or fewer homes where a financial contribution to the delivery of council homes is provided. The value of the financial payment will be the difference in gross development value between the scheme providing the level of affordable housing required in DM</p>	<p>Developments of 10 homes or less must provide the maximum viable amount towards the delivery of new council homes.</p> <p>All development that does not meet affordable housing requirements for viability reasons will be subject to viability reviews. Viability reviews must be published for public scrutiny.</p>	<p>N/A</p>	<p>The definition of minor developments on payment in lieu contribution towards council homes changes from one to ten homes to one to nine homes</p>	<p>Policy remains that developments providing 9 homes or more should provide affordable housing rather than 10</p>	<p>The policy has been amended to include the requirement for developments of between 6-9 homes to provide the maximum possible amount of social and intermediate housing.</p> <p>Further viability testing is being undertaken and the policy will be updated as required once the viability testing has been undertaken.</p>

	1.1 and a fully private scheme					
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## Retail Policy Evolution

Policy	NSP Options	NSP Preferred Option	NSP Proposed Submission Version	NSP Amended Policies	NSP Submission	NSP Main Modifications
<b>P31: Small shops</b>	<p>DM26: Local shopping parades and small shops</p> <p>Recognises the importance of local shops in neighbourhoods; ensures the provision of a range of shops to meet the needs of the local community.</p> <p>This is achieved through managing the change of use from A class uses to other uses outside town and local centres and protected shopping frontages.</p> <p>DM25: Town</p>	No policy.	<p>Specific policy introduced</p> <p>Small shops should be retained.</p> <p>Small shops at risk of displacement from a development need full consideration of the feasibility of providing affordable and suitable space for the existing occupiers in the new development.</p> <p>Developments proposing 2,500</p>	No proposed changes.	<p>No material changes.</p> <p>Definition of small shop included in fact box.</p>	<p>Policy updated to align with changes to the Use Classes Order (September 2020)</p> <p>Conditions proposed in order to secure retail uses.</p>

	centres and important shopping parades, aims to promote and protect small,		m <sup>2</sup> GIA or more of retail space shall provide at least 10% of this space as small shops.			
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# 3. Southwark's approach to office and business development

3.1 This section sets out how the policy requirement of P29: Offices and Business Development of the New Southwark Plan has evolved at different stages of the Plan and the key changes at each stage. A summary of consultation feedback at each stage is also provided.

**Table 3: sets out the evolution of the Policy P29 in relation to office and business development**

Policy	Pre-Options Version	Options Version	Preferred Options Version	Proposed Submission Version	Proposed Submission Version Amended Policies	Submission version	Main Modifications
<b>P29</b> Office and Business Development	Business, employment and enterprise' sets out requirements for offices, Railway arches, small businesses,	Policy DM 21 Office and business development: Development of businesses floorspace (B1) is permitted in CAZ, OA, CAA, town and local centres, strategic cultural areas	Policy DM24 Office and business development: focuses more on office and business development in regeneration areas. The focus is still granting permission for B1 floorspace	Policy P26: Office and business development: Offices should be intensified in CAZ, town centres, OAs and site allocations, mixed use development are promoted and the Marketing	P26: Offices and Business Development was not consulted on in the amended policies version of the NSP.	Policy P29: Office and business development. No Material changes	Policy updated to align with changes to the Use Classes Order (September 2020)  Conditions proposed in order to secure employment uses.

	employment and training. A question is also asked about how the preferred industrial locations should be protected and developed.	and Camberwell Action Area. The policy promotes mixed use development.	by retaining or increasing B1 floorspace.	Strategy has been strengthened to protect B use class floorspace.			
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## **Energy Policy Evolution**

### **NSP Options (2014)**

This version of the Energy policy proposed that:

All development must be as energy efficient as possible through the careful consideration of the location, layout and orientation of buildings to minimise energy loss and maximise the use of natural daylight, heat and ventilation. Developments should be connected to local energy generation networks or retain the capacity to connect in the future. Development should meet carbon reduction targets set at the national and regional level. Developments should use on site renewable sources of energy and carbon dioxide reduction targets must be met on site, or else any shortfall provided off site or through a payment in lieu.

### **NSP Preferred Options (2015)**

This version of the Energy policy proposed that:

Major non-residential development should meet a carbon dioxide emissions saving target of a minimum of 50% on 2013 buildings regulations up to 2019 and zero carbon from 2019 onwards.

### **NSP Proposed Submission Version (2017)**

This version of the Energy policy proposed that:

Development must minimise carbon emissions on-site by being lean (energy efficient design and construction), clean (low carbon energy supply), and then green (on-site renewable energy generation and storage).

### **NSP Amended Policies (2019)**

No amendments were made at this stage of planning policy process.

### **NSP Proposed Submission Version**

No amendments were made at this stage of planning policy process.

### **Submission Version (2020)**

No amendments were made at this stage of planning policy process.

### **Proposed Submission Version – modifications post-submission to Planning Inspectorate**

In July 2020, the council published its draft Climate Change Strategy that sets out the steps that need to be taken to meet the council's 2019 climate emergency declaration to do all it can to make the borough carbon neutral by 2030. The draft Climate Change Strategy explains the approach needed to reducing carbon and protecting biodiversity in Southwark. It sets out the principles that we want to protect whilst delivering this strategy – inclusivity, transparency and ambition. It also sets out the actions we believe need to happen in different areas (buildings, energy, travel, biodiversity, and consumption) to become carbon neutral by 2030 and protect our plants and wildlife. Public consultation on the draft strategy took place during autumn 2020:

<http://modern.gov.southwark.gov.uk/documents/s89802/Appendix%201%20Climate%20strategy.pdf>

This document has since been updated and a copy will be published in the summer of 2021.

As decided at Environmental Scrutiny Committee in July 2020, a recommendation has been added to note the significance of the New Southwark Plan in relation to the delivery of Southwark's overall climate goal, and that the Commission is keen to ensure that Southwark delivers on its ambitions for both zero/low carbon growth and improvements to biodiversity through Supplementary Planning Documents and that these should be developed as a matter of urgency.

The 2030 net zero carbon target is not a statutory target but is an ambition the council has declared. The Planning division will work towards this target in the early review. As recognised above, planning is a contributor to the Council's emerging wider strategy for addressing climate change.

### **P69 Energy Options Testing**

As set out in the Energy Addendum Background Paper (EIP59A) there were a series of options available to formulate P69 Energy and set out our approach to climate change. A number of options were considered for the Reasonable alternatives considered in terms of Climate Change. The three approaches to Climate Change options considered were:

Options testing for target for net zero carbon to address climate change:

Option	Comment
Option 1: No target	By not having a target, there is no requirement or incentive or distinctive to not reduce carbon emissions which does not address the wider aim of the plan to address climate change.
Option 2: 2050 net carbon target (chosen option)	This is a statutory target and the NSP must be in compliance with this as a minimum.

Option 3: 2030 net carbon target (early review – future option)	This is not a statutory commitment and an evidence base needs to be prepared to make this a sound policy. This option will be selected for the Early review.
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1. Options testing for carbon reduction onsite target for residential major development:

Option	Comment
Option 1: No target	By not providing a target for residential major development, it does not force development to reduce carbon onsite to address the carbon emergency as there is no mechanism to achieve onsite carbon reduction.
Option 2: London Plan – 35% carbon reduction onsite	This target in the London Plan is published and found sound and forms art of our development plan as a

	minimum requirement.
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Option 3: NSP 100% onsite carbon reduction (chosen option)	This encourages onsite reduction in new residential development to be as high as possible. The £95 carbon offset charge in the London Plan is likely to increase as set out in paragraph 9.2.8. The anticipated increase of this carbon price incentivises carbon reduction onsite and where this is not possible, there is a requirement a financial contribution to offset emissions. By increasing the carbon price, it disincentivises carbon offsetting, a balance must be struck between the onsite reduction and the carbon price to secure carbon reduction onsite.
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2. Options testing for carbon reduction onsite target for non-residential major development:

Option	Comment
Option 1: No target	By not providing a target for non-residential major development, it does not force development to reduce carbon onsite to address the carbon emergency as there is no mechanism to achieve onsite carbon reduction. This is not supported.
Option 2: London Plan – 35% carbon reduction onsite	This target in the London Plan is published and found sound and forms part of our development plan as a minimum requirement.

Option 3: NSP 40% onsite carbon reduction (chosen option)	A number of non-residential schemes in Southwark are around 40% or higher just by implementing the London Plan policy. LB Southwark by requiring 40% is able to encourage a greater carbon reduction onsite to ensure that new development is working harder to be more efficient, sustainable and reduce carbon in line with the Council's priorities. We have not received any objections specifically about the 40%.
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The policy does not address how to tackle emissions on small sites because it was not considered viable at this stage due to the need for technological advances and wider policy legislation from regional and central governance. Small sites are a crucial aspect of reducing carbon emission to be net carbon zero by 2030, and will therefore be explored in the early review of policy P69 Energy.

The route LB Southwark has chosen enables us to address the emergency with the evidence we currently have and be legally compliant with PCPA and Climate Change Act whilst also be able to collate data, evidence and emerging contexts and legislations on climate change to do an early review to more effectively address the climate emergency and meet the 2030 target with an early review to ensure that a comprehensive strategy can be assessed and scrutinised before it is implemented to tackle carbon emissions.

The London Plan IIA forms part of the evidence base for the Southwark's development plan and ensures the London Plan meets its regulatory requirements. The London Plan (2021) and its evidence base has been found sound.

### **Examination Changes**

Following discussions with SOCG representators and in response to submitted matters responses, a list of minor modifications was proposed to better demonstrate how the implicit policy interventions to adaptation and mitigate against climate change could be better highlighted to demonstrate how the NSP is meeting the 2050 net carbon zero target.

This was supported by the update to the Energy Addendum Background Paper which provide clarity on the baseline carbon emissions used, our evidence base for the policy and proposed steps to undertake an early review of P69 Energy and the wider plan to address the Climate Emergency and emerging new targets and in response to the Council's own declaration for a net carbon zero target by 2030.

**Post-Examination**

These changes have been reviewed to reflect any SOCG discussions and any modifications requested during the examination by the Inspectors or that Southwark felt should be included. These were very minor. As advised by the inspectors, the initial proposed modifications as set out in EIP182, these policy modifications are now reflected in document (EIP219). EIP182 has been superseded by the policy edits and amendments set out in this document EIP219. This represents the final version of edits.