

No.	Title
Appendix A	New Southwark Plan Proposed Submission Version: Cabinet Draft
Appendix B	New Southwark Plan Proposed Submission Version: Consultation Plan
Appendix C	New Southwark Plan Proposed Submission Version: Consultation Report
Appendix D	New Southwark Plan Proposed Submission Version Integrated Impact Assessment
Appendix E	New Southwark Plan Proposed Submission Version Habitats Regulations Assessment



# Integrated Impact Assessment

## New Southwark Plan: Proposed Submission Version

October 2017

## NON-TECHNICAL SUMMARY

The Integrated Impact Assessment (IIA) fulfils the requirement for a Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Analysis (EIA) 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.

The Council has previously completed a thorough IIA for the New Southwark Plan (NSP) preferred option policies, area visions and site allocations which assessed the impact of each of these elements of the plan against key environmental, social and economic matters which are likely to be impacted by the emerging policies and guidance. This updated IIA for the proposed submission version (PSV) of the plan has been prepared as a result of the extensive and welcome feedback received during the preferred option consultation stages and which have informed the new draft of the plan.

These proposed policies, site allocations and area visions are assessed against each of the 17 sustainability, health and equalities objectives established by the New Southwark Plan, Integrated Impact Assessment: Scoping Report (NSPIIASR) which was published in February 2015. In addition, Where policies, site allocations and visions have been amended since the preferred option versions, the IIA has been updated to reflect the impact that this has been assessed as potentially having on achieving any number of the sustainability, health and equalities objectives.

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

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 has been used to identify sustainability issues, objectives and indicators in order to assess the likely impacts of the policies of the NSP PSV and to enable monitoring of progress in the future.

Part of the IIA considers the likely impact of two options for how the NSP PSV can manage growth in the area:

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

This option would set out the council's broad aspirations for areas and identify land through site allocations where there are significant opportunities for growth through redevelopment. The option would not provide design guidance, indicate development capacity or specify which land uses and infrastructure should be delivered. Instead it would rely on other local plan policies to deliver Southwark's regeneration strategy.

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

This option would set out the council's aspirations for sites as well as the broad area visions. In addition it would provide detailed guidance on the area-based regeneration goals new development in each area should be directed towards. It would also quantify the amount of development allocated sites are anticipated to deliver and specify which land uses development

would include, including the delivery of infrastructure items such as schools, open space and health centres. It would also shape development through high level design guidance.

Based on the assessment the Place Making and Place Shaping option was considered to be the most appropriate direction for the NSP PSV and which resulted in more positive social, economic and environmental effects in the long term which benefits a range of groups and would improve the health of the population.

The IIA then assesses the area visions and site allocations (AVs&SAs) against the sustainability objectives and identifies any areas which would need to be mitigated or monitored in the plan process. This part of the appraisal process was organised by vision area:

- Bankside and the Borough
- Bermondsey
- Blackfriars Road
- Camberwell
- Crystal Palace and Gipsy Hill
- Dulwich
- East Dulwich
- Elephant and Castle
- Herne Hill and North Dulwich
- London Bridge
- Nunhead
- Old Kent Road
- Peckham
- Rotherhithe
- Walworth

The conclusions that were reached in undertaking the IIA of the NSP AVs&SAs were a result of 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. There are a number of effects where proposed mitigation is provided and the IIA also outlines the ongoing monitoring strategy of the plan.

Following this, the IIA considered NSP PSV policies, reasoned justifications and supporting text within the context of the seven topic areas set out below. The topics are based on strategic policy areas identified in the NSP PSV.

- Quality affordable homes
- Revitalised neighbourhoods
- Best start in life
- Strong local economy
- Healthy, active lives
- Cleaner, greener, safer

Having undertaken a detailed IIA it is considered that overall the seven topic areas have a positive impact on the IIA framework of 17 objectives. Key positive impacts are identified in terms of social, economic and environmental sustainability. Some risks have been identified these are generally mitigated by other policies in the plan.

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## Glossary

AAP	Area Action Plan
AMR	Authority Monitoring Report
EIA	Equalities Impact Assessment
HIA	Health Impact Assessment
IIA	Integrated Impact Assessment
LDS	Local Development Scheme
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NSP	New Southwark Plan
NSPPO	New Southwark Plan, Preferred Option
NSP AVs&SAs	New Southwark Plan Area Visions and Site Allocations
PSV	Proposed submission version
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SCI	Statement of Community Involvement
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance

# 1. Background

## Why is this document required?

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.

Paragraph 165 of the NPPF states:

*“A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors”.*

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”.*

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.

## Strategic Environmental Assessment Directive

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.

## The move towards Integrated Impact Assessment

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.

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.

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.

The IIA will consider 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 - will enable a considered and holistic approach to assessing the proposed policies in the NSP PSV in an integrated way.

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 New Southwark Plan PSV.

## **Habitats Regulations Assessment**

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.

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 PSV. '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.

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 SA&AV 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"*

The HRA of the NSP PSV 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 for consultation for the wider public.

## 2. Methodology

### Purpose of the Integrated Impact Assessment

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

The National Planning Policy Framework (NPPF) (2012) 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. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- *an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*
- *a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and*
- *an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

The National Planning Policy Framework states that:

*“A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.”*

NPPF, para 165

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 2.1. These key stages and tasks are applicable to the IIA process for the New Southwark Plan PSV. 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.

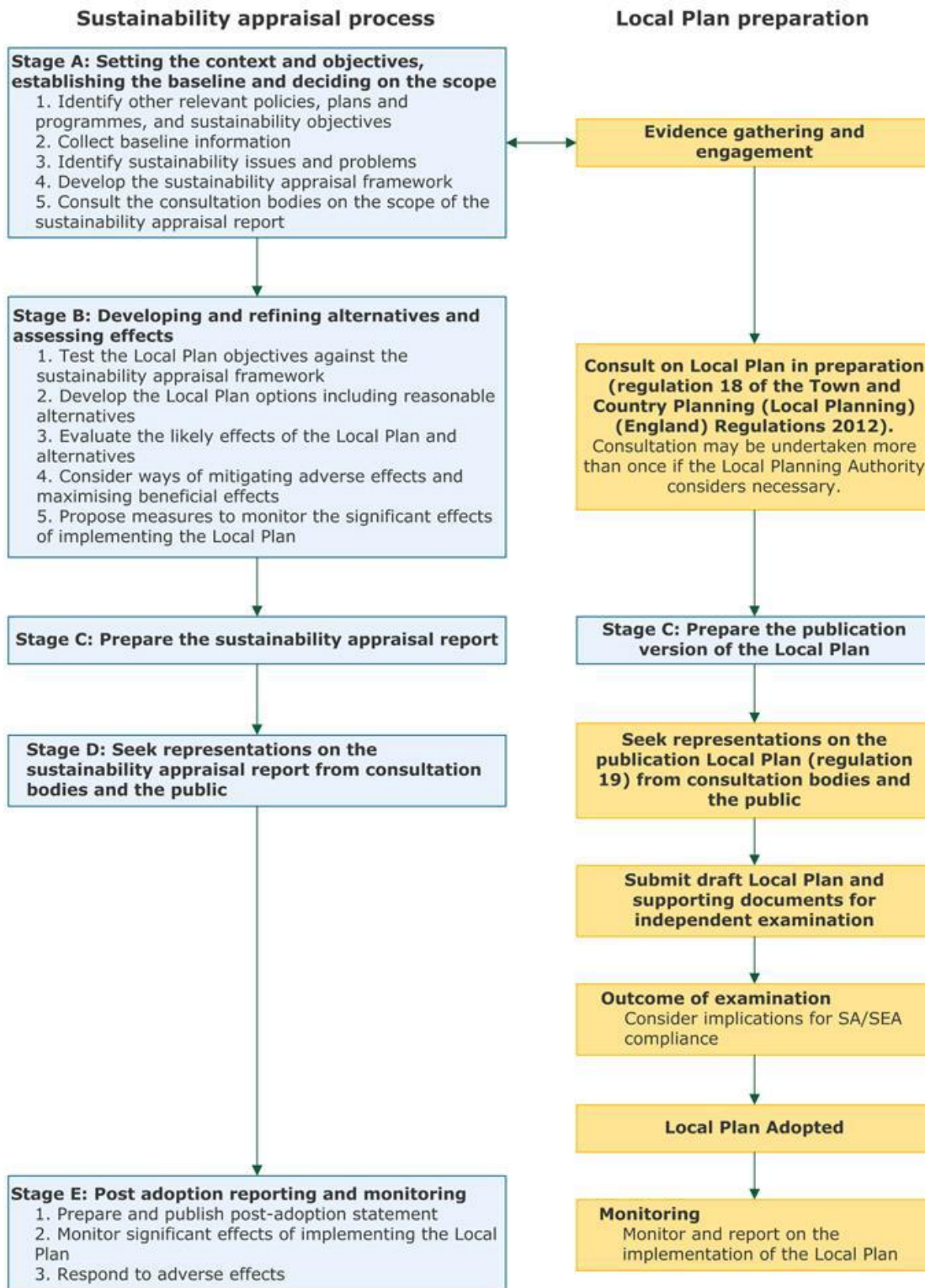


Figure 2.1  
Source: National Planning Practice Guidance 2014

## Process

Table 2.1 Sustainability Appraisal Stages Timetable

<p><b>Stage A – Scoping</b></p>	<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>
<p><b>Stage B – Testing alternatives</b></p>	<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>
<p><b>Stage C – Prepare the Integrated Impact Assessment Report</b></p>	<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>
<p><b>Stage D – Seek representations from consultation bodies and the public</b></p>	<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 report is being consulted on between October 2017 and January 2018.</p>
<p><b>Stage E – Post adoption reporting and monitoring</b></p>	<p>Review consultation responses to NSP proposed submission version and IIA report and submit to government planning inspector to support the plan.</p>

## Consultation

Community consultation has been carried out to make sure that local residents, businesses and stakeholders are informed of the changes within the borough. This is an ongoing process and so far for the NSP has involved: a high streets consultation from November 2013 to March 2015; an Issues and Options consultation from October 2014 to March 2015; and from October 2015 to February 2016 the Preferred Option for the NSP strategic and development management policies (NSPPO). The NSP AVs&SAs preferred option was consulted on between February and July 2017. A selected set of new and amended preferred option policies, area visions and site allocations were consulted on between June and September 2017. 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.

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

The law requires the statutory organisations be provided with 5 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 inform the preparation of the NSP PSV.

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.

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 proposed submission stage.

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 were consulted.

## **Monitoring the Plan**

The identification of suitable sustainability indicators within the IIA Framework to ensure issues can be effectively measured and monitored will be an iterative process and take into consideration comments made in the consultation process. We have borne in mind that the indicators need to satisfy the following characteristics since only these are suitable for monitoring purposes:

### **a. Important:**

Indicators should measure something significant to the achievement of the sustainable development aims of the NSP. These are translated into the main policy areas of the NSP and must fit within the main policy framework. Indicators should assist in the identification of the need to review a strategy, policy or proposal.

### **b. Supported by readily available information:**

The data necessary to support the use of the indicator must be available. This may be of a technical nature.

### **c. Capable of showing trends over time:**

Data over a reasonable time scale is required (e.g. 5 - 10 years) to enable trends to be identified. Data must be available during the NSP period.

### **d. Easy to understand and communicate:**

Any indicator should be readily understood by non-specialists so that the wider community can understand it's relevance to sustainable development and the local plans process.

Some of the indicators have been added to or revised slightly since the consultation on the Scoping Report to reflect the issues above and ensure that policies can be monitored effectively. The IIA framework 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 (AMR). Making use of the same indicators for the NSPPO IIA allows for consistency across the local plan process and ensures that objectives established below can be assessed.

### **Compliance with the SEA Directive**

Appendix 1 explains what the SEA directive is and signposts where the relevant information can be found within the document.

### 3. Relevant Plans in Southwark

#### Southwark's Local Plan

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. Numbers 1-7 together, below, 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 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 2016 (consolidated with alterations since 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 (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.
- 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) – The Core Strategy 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.
- 5) Area Action Plans (AAP's) – 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.
- 6) 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.
- 7) 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, for which a group of people can come together and write their own development plan. 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 (LDS) – This 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, 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**

When adopted The New Southwark Plan (NSP) will replace the ‘saved’ policies of the Southwark Plan and the Core Strategy, incorporating strategic and detailed policies in one document. 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.

The NSP will emerge through a series of iterations which will each undergo consultation 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).

An informal first stage of the preparation of the NSP, the Issues and Options paper went out to public consultation in October 2014 until March 2015. This document set out an emerging strategy for regeneration in Southwark as well as the proposed approach to planning to deliver the Council’s Fairer Future promises. It updated the strategy and area visions in the Core Strategy (2011).

The New Southwark Plan Preferred Option (NSPPO) was comprised of 2 primary parts; 1) policies and 2) area visions and site allocations (AVs&SAs). Following consultation on these main parts of the NSPPO, the council consulted on a selected set of new and amended preferred option policies.

The NSP proposed submission version (PSV) has been prepared as a result of the feedback received through consultation. It sets out how the council will deliver further regeneration and wider improvements across the borough. Southwark Council utilises planning and regeneration to improve and protect neighbourhoods across the borough. Planning decisions must generally be made in accordance with the development plan which will include the New Southwark Plan, The London Plan, Area Action Plans and Neighbourhood Plans.

The NSP PSV contains strategic policies setting out the Council’s strategy for planning and regeneration along with detailed development management policies. At the time of writing it was expected that consultation on the NSP PSV will take place between October 2017 and January 2018.

The NSP explains the council’s strategy for regeneration from 2018 to 2033. 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 attract more businesses into the borough to increase job opportunities
- Supports our high streets and increase 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
- Set policies to provide more green infrastructure and to promote opportunities for healthy activities

The NSP will be a spatial plan. Not only will it set out planning policies to guide development but it will also explain how development will be delivered and may inform future decisions about investment in infrastructure.

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

**Area visions:** Southwark's neighbourhoods each have a rich, varied and unique character. The New Southwark Plan will contain 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.

**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.

Through the Housing and Planning Act (2016), the Government has introduced changes to the way that local planning authorities are required to approach site allocations in their local plans. The council is awaiting the publication of the enabling regulations for the act to clarify how to implement the new approach to site allocations.

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

The New Southwark Plan, Integrated Impact Assessment: Scoping Report (NSPIASR) was published in February 2015. The NSPIASR considered relevant baseline information regarding key environmental, social and economic matters within the borough which are likely to be impacted by NSP policies within the NSP PSV. 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.

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

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 PSV. This process 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.

It is important to identify this policy framework at an early stage. This is because a wide range of guidance and initiatives influence the United Kingdom’s planning system and the development of planning policy in Southwark.

The policy framework is constantly evolving: at a national level, the NPPF and NPPG are now in place (replacing and simplifying a suite of former national policy and guidance documents); at a regional level, The London Plan 2016 and associated SPG’s are subject to on-going review.

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.

Appendix 3 provides an overview of the key international, national, regional and local policies, plans and programmes that inform the NSP and the accompanying IIA.

### **Stages of Preparation for the New Southwark Plan**

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 sets 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. 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. To date the council has undertaken the following stages of consultation to inform the formulation of draft Local Plan policies.

#### Timeline for the New Southwark Plan

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)	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.  Formal consultation initially took place on this document 6 February 2017 to 28 April 2017 however was extended to & July 2017.
New Southwark Plan: New and Amended Preferred Option Policies Consultation	21 <sup>st</sup> June to 13 <sup>th</sup> September 2017
New Southwark Plan Proposed Submission Version <b>(including this IIA appraisal to assess the updated visions, sites and policies)</b>	To be published and informally consulted on from 25 October 2017 for 12 weeks, with formal consultation commencing from 1 December 2017 to 12 January 2018
Public examination	2018
Adoption	2018

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.

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.

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.

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.

Between 21 June and 13 September 2017 the council consulted a selected set of new and amended policies for both the New Southwark Plan and Old Kent Road Area Action Plan. Consultation responses received, as with previous stages and consultation periods, have been carefully considered and informed the proposed submission version of the plan.

The Council is carrying out the ‘proposed submission’ stage of consultation to provide interested stakeholders with an opportunity to comment on the revised policies, visions and site allocation. However, responses submitted at this stage should be 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?

Following this stage of consultation on the proposed submission draft, the council will then submit the plan as the 'submission' version to a government planning inspector, who will test the plan to make sure it is both legal and sound.

## **4. Context and baseline**

### **Links to other policies, plans and programmes**

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 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 IIA and help in identifying key sustainability issues.

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.

At a local level, planning decisions in Southwark are influenced by a number of statutory planning 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.

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. 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**

The aim in 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.

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.

The baseline information collected is set out in Appendix 4.

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

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.

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

Table 4.1 identifies key sustainability issues that have been identified for the NSP which the IIA will 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.

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

<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>	

- 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

### **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

### **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

### **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

### **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



## **5. Appraisal Methodology**

A previous IIA considered policies contained within the New Southwark Plan Preferred Option (NSPPO) and references work completed for the New Southwark Plan Integrated Impact Assessment: Scoping Report (NSPIIASR) which was published in February 2015. The NSPIIASR considered relevant baseline information regarding key environmental, social and economic matters within the borough which are likely to be impacted by NSP policies included in the NSP PSV. The NSPIIASR 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 emerging policies.

### **IIA Assessment Framework**

The establishment of appropriate objectives and indicative guide questions / sub-criteria is central to the assessment process and provides a way in which the performance of NSP PSV options, policies and area visions and site allocations can be assessed.

The IIA framework is based on 17 sustainability objectives outlined in the NSPIIASR. These objectives were developed by researching specific issues affecting Southwark, through a detailed desk top analysis and internal discussions. The objectives reflect the current social, economic and environmental issues affecting the borough.

The 17 objectives are reflective of a move toward the integration of impact assessments for the NSP. Objectives and associated criteria questions can be linked to the Sustainability Appraisal, Health Impact Assessment and Equalities Analysis.

Each of the objectives have 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 (AMR). Making use of the same indicators for the IIA allows for a consistency across the Local Plan process and ensures that objectives established below can be assessed

**Table5.1: Integrated Impact Assessment Framework of Objectives**

IIA Objective	SA/HIA/EIA Sub-criteria for assessment
<b>IIA01</b>	
To tackle poverty and encourage wealth creation	<ul style="list-style-type: none"> <li>&gt; Will it improve the range of job opportunities for all people?</li> <li>&gt; Will it help to diversify the economy?</li> <li>&gt; Will it increase the number of higher paid jobs in the borough?</li> <li>&gt; Will it help reduce overall unemployment, particularly long-term unemployment?</li> <li>&gt; Will it encourage the retention and / or growth of local employment and training opportunities in the most deprived areas?</li> <li>&gt; Will it assist in providing land and buildings of a type required by businesses, for a range of employment uses?</li> <li>&gt; Will it reduce poverty in those areas and communities / equalities groups most affected?</li> <li>&gt; Will it improve access to low-cost transport and other facilities?</li> <li>&gt; Will it provide for successful neighbourhoods for all?</li> <li>&gt; Will it promote and enable tourism opportunities to be exploited, and employment created?</li> <li>&gt; Will it result in a loss of employment land?</li> </ul>
<b>IIA02</b>	
To improve the education and skill of the population	<ul style="list-style-type: none"> <li>&gt; Will it provide opportunities to improve the skills and qualifications of the population, particularly for young people and adults?</li> <li>&gt; Will it help improve employee education / training programmes?</li> <li>&gt; Will it help reduce skills shortages?</li> <li>&gt; Will it help to reduce the disparity in educational achievement between different ethnic groups?</li> </ul>
<b>IIA03</b>	
To improve the health of the population	<ul style="list-style-type: none"> <li>&gt; Will it promote and facilitate healthy living and active lifestyles amongst different groups?</li> <li>&gt; Will it improve access to health and social care / treatment for all sectors of the community?</li> </ul>

	<ul style="list-style-type: none"> <li>&gt; 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?</li> <li>&gt; Will it improve the quality of housing for all?</li> <li>&gt; Will it improve access to jobs for all and otherwise reduce poverty?</li> <li>&gt; 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?</li> <li>&gt; Will it help facilitate the supply and availability of locally produced food?</li> <li>&gt; Will it help improve mental and emotional health, reducing social exclusion?</li> <li>&gt; Will it promote non-polluting forms of transport?</li> <li>&gt; Will it reduce exposure to poor air quality across all groups?</li> </ul>
<b>IIA04</b>	
To reduce the incidence of crime and the fear of crime	<ul style="list-style-type: none"> <li>&gt; Will it improve safety and security?</li> <li>&gt; Will it incorporate measures to reduce crime and the fear of crime, including anti-social behaviour?</li> <li>&gt; Will it provide for a well maintained and inclusive public realm and other public facilities?</li> <li>&gt; Will it encourage an active and connected, strong and cohesive community?</li> </ul>
<b>IIA05</b>	
To promote social inclusion, equality, diversity and community cohesion	<ul style="list-style-type: none"> <li>&gt; Will it help support the voluntary and community sectors?</li> <li>&gt; Will it support active community engagement?</li> <li>&gt; Will it support a diversity of lifestyles and communities?</li> <li>&gt; Will it promote accessibility for those people who are elderly or disabled?</li> <li>&gt; Will it improve access to low-cost transport and other facilities?</li> <li>&gt; Will it help sustain the provision of community facilities and open space that meets local needs?</li> <li>&gt; 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?</li> <li>&gt; 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?</li> </ul>
<b>IIA06</b>	
To reduce contributions to	<ul style="list-style-type: none"> <li>&gt; Will it reduce CO2 and other greenhouse gas emissions?</li> </ul>

climate change	<ul style="list-style-type: none"> <li>&gt; Will it reduce consumption of energy?</li> <li>&gt; Will it use renewable sources of energy?</li> <li>&gt; Will it help local people cope with hotter/drier summers and warmer wetter winters?</li> <li>&gt; Will it mitigate against the urban heat island effect?</li> <li>&gt; Will it encourage the re-use of resources?</li> <li>&gt; Will it encourage water efficiency and drought resilience?</li> <li>&gt; Will it encourage the reuse or improvement of buildings and land that are vacant, under-utilised or in disrepair?</li> <li>&gt; Will it maintain or enhance biodiversity?</li> </ul>
<b>IIA07</b>	
To improve the air quality of Southwark	<ul style="list-style-type: none"> <li>&gt; Will it improve air quality?</li> <li>&gt; Will it help to reduce emissions of PM10, NO2?</li> <li>&gt; Will it minimise construction impacts such as dust, noise, vibration and odours?</li> <li>&gt; Will it encourage a reduction in amount and length of journeys made by car?</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>
<b>IIA09</b>	
To encourage sustainable use of water resources	<ul style="list-style-type: none"> <li>&gt; Will it result in a net increase in the demand for water and foul sewage disposal?</li> <li>&gt; Will it encourage reuse of water?</li> <li>&gt; Will it maximise use of rainwater or other local water supplies?</li> <li>&gt; Will it reduce discharges to surface and groundwater?</li> </ul>
<b>IIA10</b>	
To maintain and enhance the quality of land and soils	<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>
<b>IIA11</b>	
To protect and enhance	<ul style="list-style-type: none"> <li>&gt; Will it conserve and enhance local landscape and townscape character and visual amenity?</li> </ul>

quality of landscape and townscape	<ul style="list-style-type: none"> <li>&gt; Will it improve the relationship between different buildings, streets, parks and waterways and other spaces that make up the townscape character?</li> <li>&gt; Will it have a negative impact on important strategic/local views?</li> <li>&gt; Will it incorporate sustainable design and construction techniques?</li> </ul>
<b>IIA12</b>	
To conserve and enhance the historic environment and cultural assets	<ul style="list-style-type: none"> <li>&gt; Will it protect, maintain and enhance the condition and setting of features and areas of cultural, historical and archaeological heritage in the environment?</li> <li>&gt; Will it promote the historic environment and also contribute to better understanding of the historic environment?</li> <li>&gt; Will it promote high quality design and sustainable construction?</li> <li>&gt; Will it respect visual amenity and the spatial diversity of communities?</li> <li>&gt; Will it maintain or increase access to leisure, sporting, cultural and arts destinations and facilities?</li> <li>&gt; Will it improve leisure, sporting, cultural and arts provision?</li> </ul>
<b>IIA13</b>	
To protect and enhance open spaces, green corridors and biodiversity	<ul style="list-style-type: none"> <li>&gt; Will it encourage development on previously developed land?</li> <li>&gt; Will it improve the quality and access to open spaces in areas of deficiency?</li> <li>&gt; Will it provide a range of play spaces for children and young people?</li> <li>&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?</li> <li>&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?</li> <li>&gt; Will it protect and enhance natural habitats and protect priority species?</li> <li>&gt; Will it encourage the creation of new habitats, including through the provision of additional open space and green roofs?</li> <li>&gt; Will it help achieve the Biodiversity Action Plan (BAP) targets?</li> <li>&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?)</li> </ul>
<b>IIA14</b>	
To reduce vulnerability to flooding	<ul style="list-style-type: none"> <li>&gt; Will the development be an area at risk of flooding?</li> <li>&gt; Will it minimise the risk of and from flooding to people and property?</li> <li>&gt; Will it protect and improve flood defences and allow them to be maintained?</li> <li>&gt; Will it promote the use of sustainable urban drainage systems?</li> </ul>

<b>IIA15</b>	
To provide everyone with the opportunity to live in a decent home	<ul style="list-style-type: none"> <li>&gt; Will it improve the supply of housing?</li> <li>&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?</li> <li>&gt; Will it deliver 'healthy homes'? (e.g. in relation to warmth, overcrowding, noise and mental health?)</li> <li>&gt; Will it improve overall design quality, including flexibility of stock to enable it to evolve to meet changing needs?</li> </ul>
<b>IIA16</b>	
To promote sustainable transport and minimise the need to travel by car	<ul style="list-style-type: none"> <li>&gt; Will it encourage development at locations that enable walking, cycling and / or the use of public transport and connected to local services and facilities?</li> <li>&gt; Will it reduce car use?</li> <li>&gt; Will it reduce the number and length of journeys undertaken by car?</li> <li>&gt; Will it reduce road traffic accidents?</li> <li>&gt; Will it improve public transport?</li> <li>&gt; Will it promote walking and cycling?</li> <li>&gt; Will it allow people with mobility problems or a disability to access buildings and places?</li> <li>&gt; Will it improve connections across the area to local services, facilities, places of employment and green infrastructure?</li> </ul>
<b>IIA17</b>	
To provide the necessary infrastructure to support existing and future development	<ul style="list-style-type: none"> <li>&gt; Will it provide enough social infrastructure and meet local needs?</li> <li>&gt; Does the proposal explore opportunities for shared community use and co-location of services?</li> <li>&gt; Will it provide enough physical infrastructure?</li> <li>&gt; Will it provide enough green infrastructure?</li> </ul>

## Comparison of the IIA objectives

As part of the IIA a comparison of the objectives was undertaken to check if the objectives are compatible with one another.

	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
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								
IIAO 11	✓	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

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.

## Method of Assessment

This section explains the proposed approach and methods for the IIA of the NSP PSV.

The IIA Framework presented in Table 5.1 will form the basis for appraising reasonable options for site allocations and area visions. The table sets out the criteria that will be used to determine the nature and significance of effects against IIA Objectives, including any assumptions that will be made or uncertainties. This ensures a consistent approach is taken for the appraisal of all reasonable options.

The IIA is structured under the objectives in the IIA Framework, which incorporate topics in the SEA Directive. This provides a framework and structure to evaluate the likely significant effects of

the NSP PSV against these key topics, which include health and equality. The appraisal also considers short, medium and long term effects.

The appraisal is undertaken using professional judgment, supported by the baseline information and wider evidence base. A summary appraisal commentary is provided in section 4 of this IIA report 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) are described, along with any assumptions or uncertainties noted. Where necessary, the appraisal commentary also identifies any potential cumulative effects for that option.

IIA is an assessment tool that helps to inform decision-making, it is not the sole basis for a decision. The council has considered 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. This report clearly set out the reasons for the selection or rejection of options in plan-making in Section 6.

### Health Impact Assessment

For the HIA element of the IIA the impacts on the population groups listed in Table 5.2 will be considered:

Table 5.2	
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

### Equalities Analysis

For the EqIA element of the IIA the impacts on the protected characteristics listed below in Table 5.3 will be considered.

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.

Table 5.3: Protected Characteristics for Equalities Impact Assessment

Table 5.3	
Age	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.

Definitions are from the Equalities and Human Rights Commission

### **Southwark Council's approach to equality: delivering a fairer future for all (2011)**

This report sets out the overarching equality objectives which are linked to the strategic priorities of the council. The objectives below are also 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

## Assessment of the 'alternative options', area visions and site allocations

Table 5.2 demonstrates the system of symbols which will be used to represent the findings of the IIA for different elements of the assessment of the alternative options and area visions and site allocations.

**Table 5.4**

Key	✓✓	Major or direct positive
	✓	Minor or indirect positive
	xx	Major or indirect negative
	x	Minor or indirect negative
	?	Uncertain
	-	Neutral

Site allocations are grouped together with their relevant area visions, which ensures a consistent scale for comparison and that appropriate consideration is given to the potential cumulative effects of site options on areas of the borough:

- Bankside and the Borough
- Bermondsey
- Blackfriars Road
- Camberwell
- Crystal Palace and Gipsy Hill
- Dulwich
- East Dulwich
- Elephant and Castle
- Herne Hill and North Dulwich
- London Bridge
- Nunhead
- Old Kent Road
- Peckham
- Rotherhithe
- Walworth

The assessment of area visions and site allocations was assessed with explicit reference to the short, medium and long term impacts of the designations. This was considered appropriate due 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.

## Assessment of policies

### IIA Topics derived from NSP Strategic policies

The sustainability, equalities and health impacts of policies have been assessed with reference to the following 'strategic policy' areas outlined in the NSP PSV. Each strategic policy area relates to a particular topic or set of related topics. This ensures a consistent approach is used by the IIA.

The strategic policy /topic areas identified for use by the IIA include:

1. Quality affordable homes
2. Social regeneration to revitalise neighbourhoods
3. Best start in life
4. Strong local economy
5. Healthy active lives
6. Cleaner, greener, safer

Table 5.5 demonstrates the system of symbols which will be used to represent the findings of the IIA for different elements of the assessment of the policies.

**Table 5.5**

Key		
	✓✓	Major or direct positive
	✓	Minor or indirect positive
	X	Major or indirect negative
	XX	Minor or indirect negative
	?	Uncertain
	No symbol or comment	Neutral

The policies were assessed with the short, medium and long term impacts. Where a variation in the impact over time was identified this has been noted in the comments. However, due to the fact that temporal impacts are bound to be experienced spatially, this has been explicitly referenced in the area visions and site allocations assessment.

## **6. Appraisal Summary from the IIA**

This section sets out a summary of the assessments which looked at:

- The plan options and alternatives
- The site allocations and area visions
- The policies

### **6.1 Plan Options and alternatives, Site allocations and area visions**

#### **How has sustainability been considered in the development of the NSP Site Allocations and Area Visions?**

Previous stages during the development of the NSP have helped to guide the sustainability of the emerging plan overall and of the framing of policy options for the NSP PSV of the AV&SAs. Areas of concern identified at the scoping stages led to development of the strategic and development management policies and monitoring framework included in the NSPPO, consulted on in 2015 and 2016. Since then informal consultation with stakeholders in local vision areas and development of the evidence base has helped further our understanding of local sustainability, equalities and health issues.

The appraisal has involved making a certain amount of subjective judgements of the likely sustainability, equalities and health impacts of proceeding with any option over the short, medium and long term. The judgement is made by reference to what the IIA objective is trying to achieve and the possible impact a proposed action may have. Impacts of strategic options may be hard to predict at the local level but once site specific information is available it will be easier to establish mitigation measures.

#### **What options have been considered and why?**

The NSPPO consultation set 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.

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 that Southwark has a strong economy, identifying regeneration areas extending across most of the borough including London Plan opportunity areas and local action areas.

We have also assembled an extensive evidence base which confirms both the need and opportunity for largescale 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.

Within this context potential NSP PSV 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?

Following these considerations, two options were considered to be reasonable alternatives and were assessed against the IIA framework.

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

This option involves the description of vision areas and the identification of site allocations but rely on other local plan policies in the NSP and London Plan to determine planning applications. It does not provide any significant new material guidance for development, such as site capacities, land use 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.

In this option sites are selected for allocation from the potential sites consulted on at the NSP options stage as well as land identified through an ongoing call-for-sites, the London Strategic Housing Land Availability Assessment (SHLAA) and by planning and regeneration officers. As an inner London borough, Southwark is predominantly urban in nature and has at least an adequate level of transport accessibility across most of its area. Given the planning imperative nationally and regionally to make effective use of previously developed land in accessible locations the majority of sites have opportunities for development. Separate options for different spatial distribution of development are therefore not considered. 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.

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 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. The option quantifies the strategic development opportunities in the borough allowing estimates of growth to demonstrate key objectives such as housing delivery would be met; it is therefore a genuine reasonable alternative.

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 PSV 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**

This option sets out area visions and site allocations as per Option A. However, they additionally provide 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.

In this option visions provide a more specific strategy for each area to be taken into account by all relevant development proposals in the borough. 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 enhanced.

In this option 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. Site allocations generally set out the indicative development capacity that will be acceptable on each site. This is not a minimum or maximum capacity but it indicates the scale of development that is likely to be acceptable. A site allocation may also provide site specific design guidance that should be considered in the event of redevelopment.

In this option sites are selected in a similar manner to Option A as sites that could accommodate significant development also present the opportunity to satisfy regeneration and sustainability objectives through controlling land use and providing guidance. They present a single spatial option, maximizing the sustainable redevelopment of previously developed land.

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 vision areas and on specific sites. It would also secure land for infrastructure and deliver uplift in certain land uses, such as those generating employment and contributing to the growth of economic clusters. 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, by allowing a range of acceptable land uses, avoiding absolute capacity limits and through the application of other local plan policies it will still be possible to respond to changing circumstances. This option would seek to proactively deliver growth, infrastructure and design outcomes sought by the London Plan and NSP PSV.

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

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 5. The assessment considers a wide range of criteria for each objective and the list of questions highlighted in Table 4.1 is not exhaustive. The assessment summarises the impacts and gives an overall score based on the opportunities the NSP could offer in each scenario. The following summary explains the

results and gives a qualitative analysis of the complexities and challenges surrounding the two alternative approaches.

Option A generated a high degree of uncertainty around its effects, particularly in the medium to long term. By identifying development land without detailed guidance strategic opportunities to meet IIA objectives are not very likely to be exploited. Although other local plan policies will secure positive effects they may not always be successful without this 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 uncertainties impact particular groups.

In the short term Option A would be neutral in most of its effects with positive effects attributed to accelerated redevelopment of sites providing employment in construction, remediating land and delivering much needed new homes. If this option were 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.

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, 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.

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. At present the evidence is not available to specify further requirements in this draft of the plan but these issues deserve further investigation as the plan is developed.

### **What option was chosen for the NSP PSV and why?**

The options above were considered in the period preceding, during and following the NSPPO consultation. This included extensive consultation with other council services and infrastructure delivery partners as well as consulting local groups to understand their aspirations for vision areas.

The NSP PSV has been prepared in accordance with the principles outlined in Option B. There are considered to be more social, economic and environmental benefits in this scenario which will improve the health and wellbeing of communities. Whilst the approach may be refined through the iterative process of plan development to enhance the mitigation of uncertainty, the council considers the NSP PSV can help guide and deliver redevelopment successfully.

Option A demonstrates that 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. The council has decided instead to employ place making and place shaping to secure the full benefits of redevelopment.

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. Guidance in the NSP PSV will complement local plan policy requirements through site specific information so that it is understood upfront how proposals can integrate into their local context and help to deliver area visions. The positive effects of these policies will thereby be enhanced.

By encouraging comprehensive redevelopment, with some sites concentrated in localised areas, development could be disruptive in the short term for some communities. While local plan policies will go a long way to manage impacts it will be important to investigate further opportunities to offset these effects. There may also be opportunities to further support strategic mitigation of climate change and to manage flood risk, for instance through guidance on strategic solutions for decentralised energy or sustainable drainage.

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

In the NSP PSV 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 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.

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.

In the NSP PSV the site allocations are grouped together within their respective vision areas. This grouping has been followed for the appraisal and each vision area has been assessed as a whole including the allocation sites within it, along with the content of their allocation policies. In some instances their interaction with policies proposed in the NSP PSV are also assessed as both documents form the preferred option of the plan. The full appraisal of the site allocations and area visions is provided at Appendix 5.

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

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

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. 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. These include the central London office market; health, academic and research growth associated with major institutions; revitalised town centres and agglomerations of creative businesses.

The education and skills of the population will be benefitted by new school places, support for higher education growth and training opportunities within construction and new business space. 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. By allocating land for the critical infrastructure needs of Southwark there will be major positive impacts for the smooth delivery of existing and future development.

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 enhance the quality of landscape and townscape.

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

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. Due to the nature of the plan this is perhaps not surprising – 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 preferred option strategic and development management policies to further mitigate negative effects.

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 benefit 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**

The plan provides a positive strategy for growth however there are some impacts that may be uncertain at this stage.

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.

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 such as the Elephant and Castle junction. 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.

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**

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.

Synergistic effects interact to produce a total effect greater than the sum of the individual effects. 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.

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.

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**

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 proposed NSPPO development management policies. The following measures warrant further investigation:

- 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

## **Uncertainties and Risks**

The conclusions that were reached in undertaking the IIA of the NSP PSV were a result of 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.

Consequently, there may be some questions about the way some area visions and site allocations were ranked against particular sustainability objectives. However, whilst some individual rankings may possibly be challenged at this level, it is the overall performance of policy against the IIA Framework taken as a whole, which is the most important element to consider.

## 6.2 Appraisal Summary for NSP PSV Policies

The IIA appraisal tables in Appendix 6 set out the details of the impacts for each of the seven topic areas and individual policies in terms of the 17 objectives in the IIA framework. Each appraisal is referenced by Strategic Policy and detailed development management policy contained in the NSP PSV.

### 1. Quality Affordable Homes

#### Overall Summary: Positive

Strategic Policy 1: “Quality affordable homes” and the development management policies that sit under it as a topic area 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, family sized homes, private rented sector homes and housing for the elderly and other people with specialist needs. Our policies seeking to deliver these new homes, combined with optimizing the delivery of new homes through appropriate densities, means more housing of all types will be built and should relieve pressure on existing housing stock, reducing overcrowding and increasing affordability and security. However, it is noted there is a risk that the demand for housing could have a knock on effect on the delivery of jobs and employment space and our other proposed policies in the plan must be considered along side SP1 and those that sit under it, including Strategic policies 2, 3 4 and 5 and the corresponding the development management policies.
- Reducing overcrowding and providing more homes to meet our current unmet need and the predicted future demand will contribute significantly to an increased chance of good physical and mental health. Poor housing conditions can cause stress and sleep deprivation which can also impact on children’s school life. Providing homes for the families, the elderly, disabled people, private renters and people in between conventional accommodation arrangements (i.e. HMOs and hostels) will help all these diverse sections of society live their lives uninhibited by housing issues, enabling greater community cohesion.
- SP1 and the concurrent development management policies may incur risks. Soutwark already has poor air quality and providing more housing to accommodate a larger number of people will increase exposure to poor air quality. A growth in housing may worsen air quality through increased emissions from building plant and increased transport demand, particularly with the provision for family homes, where cars are rightly seen as a convenient mode of transport. There is a likelihood that the demand for energy and water will increase with an increased population. Looked at in isolation (see SP6 summary and policy

assessments), an increase in housing will likely increase overall carbon emissions from the current baseline. However even with 'no plan' there would likely be a significant increase in housing and associated effects given the housing targets established in the London Plan.

- Optimising the delivery of new homes through appropriate densities will promote walkable neighbourhoods at higher densities. This will have several benefits, some addressing the potential risks identified above. These benefits include a more lively street life with services and facilities becoming more viable due to the increase in demand from the increased number of residents. This will have the secondary benefit of reducing the opportunity for crime and the fear of crime through an increase in street life and natural surveillance. More facilities and services due to increased demand will help form walkable neighborhoods in which everything a resident needs is within easy walking distance. This will then have knock-on impacts on the transport network, reducing the demand for private car use and encouraging walking, cycling and public transport. This in turn will reduce emissions and pollution per capita.
- Other risks identified from SP1 include a potential loss of unprotected amenity land on housing estates to help deliver new affordable council homes, increased construction impacts from the increase in overall housing delivery and that the majority of locations for housing will likely be in an area at risk of some form of flooding. These issues will be addressed through the other policies in the New Southwark Plan PSV.

## **2. Social regeneration to revitalise neighbourhoods**

### **Overall Summary: Positive**

Strategic Policy 2: "Social regeneration to revitalised neighbourhoods" and the development management policies that sit under it as a topic area 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:

- With reference to revitalising neighbourhoods with the aim of making them places where everyone can be proud to live and work, Southwark Council have one of the most ambitious regeneration programmes in the country. It is leveraging the borough's unique position in central London to benefit local residents and encourage innovative development of spaces to provide new council and other affordable homes, jobs, schools, shops and places to work.
- SP2 outlines that homes are being built rapidly with most of the change taking place in the north and centre 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.
- The importance of urban greening and green infrastructure is recognised by development management policies. It is encouraged with reference to delivering multiple amenity and environmental benefits. Development that provides communal amenity space providing multiple benefits such as food growing is also encouraged.

- Development management policies recognise good quality housing can help to improve the health, safety, amenity and quality of life of current and future residents.
- Development which provides for accessible and inclusive design for all ages and especially for people with disabilities is supported ensuring future development is in compliance with the Equalities Act 2010, relevant London Plan policies and Part M of the building regulations.
- 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 locations micro-climate. 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.

### 3. Best Start in Life

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

Strategic Policy 3: "Best Start in Life" and the development management policies that sit under it as a topic area 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.
- In addition to supporting younger children development management policies seek to ensure appropriate student housing is delivered. This plan recognises that providing too much student accommodation can restrict the Council's ability to deliver more family and affordable housing. By requiring an element of affordable housing or contribution towards affordable housing from student housing development the council can work towards meeting the strategic need for student accommodation and the local need for affordable homes.

## 4. Strong Local Economy

### Overall Summary: Positive

Strategic Policy 4: “Strong Local Economy” and the development management policies that sit under it as a topic area 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.
- 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 and of railway arches. Activities supported include business uses (B Use Classes), retail (A Use Classes) and community facilities (D use classes) in railway arches.
- Tourism is promoted by a range of development management policies including those which support proposals for new hotels, protect heritage assets and recognise the contribution of pubs to the historic character of a given area. It is recognised that Southwark’s historic assets can promote and enable tourism opportunities.
- Development management policies aim to help and improve employee education and training programmes. The council’s Economic Wellbeing Strategy objective of overcoming barriers to employment is supported by policies which promote a targeted approach to improve employment participation within Southwark and promote an entrepreneurial approach to business, especially amongst young people. The plan also seeks to ensure small and independent businesses, which make up a overwhelming proportion of employers in Southwark, are provided for in development.
- Recognition and support is given to 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 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.

## 5. Healthy, Active Lives

### Overall Summary: Positive

Strategic Policy 5: “Healthy active lives” and the development management policies that sit under it as a topic area 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 use of private motor vehicles will reduce negative environmental impacts, including CO2 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.

## **6. Cleaner, Greener, Safer**

### **Overall Summary: Positive**

Strategic Policy 6: "Cleaner, greener, safer" and the development management policies that sit under it as a topic area (P54-69) 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:

- 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 CO<sub>2</sub> 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 CO<sub>2</sub> emissions.
- Ensuring new buildings and existing buildings are built or retrofitted to high environmental standards will also save energy and reduce greenhouse gas emissions. 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.

## 7. Implementation

### Overall Summary: Positive

The implementation policies proposed in the New Southwark Plan have been assessed as having an overall positive impact. Ensuring existing infrastructure is adequate and building new infrastructure will help enable an increase in development, as the capacity of the borough (for services and utilities such as water, power, waste management and transport) is increased.

- The assessment identified several positive impacts following from this, for example the opportunity to increase the supply of housing, or provide more jobs; jobs could be in the construction, expansion or upgrading of infrastructure, the construction of subsequent development made possible by the infrastructure or in the built-out development itself. Analysis of IP1 also recognised that identifying and implementing shared servicing programmes for developments in concentrated areas has the potential to improve air quality and road safety by minimising vehicle trips. The main risk noted is that an expansion or upgrade of water infrastructure, required because of the pressure new development will place on existing capacity, will result in a net increase in demand for water and foul sewage disposal.
- Planning obligations such as Section 106 agreements and the community infrastructure levy will have a largely positive impact. The aim of IP2 is to offset the negative impacts of a development through financial contributions made by the developer to the council. For example, providing affordable housing or business space would help address a rise in housing or business premises costs; transport and public realm investment would help address increased pressure on transport; and building health and community facilities will help expand the capacity of the borough's social infrastructure. Requiring developments to include training, work placements and employment contributions for local people will improve employment opportunities. In effect, DM65 seeks to address all of the impact objectives listed as part of the integrated impact assessment through investment enabled by development.
- The impact of IP3 'Enforcement against unlawful development' was assessed as largely being dependent on the individual cases and the impact of the policy cannot be assessed accurately in isolation. However, it is considered that the impacts of enforcement action are highly likely to be positive. Action would be taken against unlawful development that breaches planning policy. Our policies are there to protect amenity of people and ensure appropriate development is implemented. Enforcement action against persons means their development is in breach of our policies, for example accommodation standards may be very poor. In this instance, the action taken will mean that the standard of accommodation provided would be improved.
- It was considered that compulsory purchase orders (IP4), monitoring (IP5) Statement of community involvement (IP6) and Local Development Scheme (IP7) will not directly impact any of the objectives set out in the integrated impact assessment when assessed in isolation. These policies form extremely useful tools from which more can be achieved in regeneration. For example, the impacts of a compulsory purchase of land by the council will depend on what that land will be used for in the future. This will be influenced by other policies in the New Southwark Plan. Monitoring will not directly impact the built environment but will enable us to analyse what has been granted permission and what has been built in the borough. This will form a large evidence base to be built up that will help us refine and inform our policies in the future.

### **6.3 Conclusion**

The overall impact of the seven identified topics across the strategic policies, in terms of the 17 objectives in the IIA framework has been assessed as being positive. This reflects the positive appraisal of each of the seven topics. Some risks have been identified been these are generally mitigated by other policies in the plan.

## Section 8 - Implementation

### What are the next stages in the plan preparation?

IIA PRODUCTION STAGE	TIMETABLE
Consideration of the responses to the consultation on the NSP SA&AV preferred option and IIA report.	Spring to Autumn 2017
Preparation of the final IIA report to accompany the proposed submission version of the NSP proposed submission version.	Autumn 2017
Consultation on NSP proposed submission version and draft final IIA report	October – January 2017
Adoption of the NSP and publication of the final IIA report.	2018

### How will the plan be implemented?

The plan will shape development in Southwark from 2018 to 2033 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.

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.

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.

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.

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.

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**

The NPPF updates the approach to plan making by simplifying the process and returning to a system of Local Plans. We are preparing the 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.

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.

### **Proposals for monitoring**

It is important that the plan is monitored to keep track of whether it is working in the way it should. The IIA has identified indicators that should be used to monitor the NSP. 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. Where new indicators have been identified, through the IIA process, these will be added to the AMR. The NSP PSV sets out a monitoring framework to ensure new development meets the objectives of the plan. These indicators will be added to our AMR once the NSP is adopted.

## **9. Appendices**

Appendix 1: Strategic Directive Requirement

Appendix 2: Relevant Plans, Programmes and Strategies

Appendix 3: Baseline data – Facts and Figures

Appendix 4: : Assessment of preferred option and alternative

Appendix 5: Assessment of area visions and site allocations

Appendix 6: Assessment of area visions and site allocations

Appendix 7: Assessment of policies

