

## Cabinet

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11.00 am

Rooms GO2A, B and C, 160 Tooley Street, London SE1 2QH

## Appendices – Part 2

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Date: 11 July 2024

**DRAFT**

**AFFORDABLE  
HOUSING**

**SUPPLEMENTARY  
PLANNING DOCUMENT (SPD)**

# FOREWORD

The delivery of genuinely affordable housing, and social rent homes in particular, is an immensely pressing priority in Southwark, and one which underpins the Southwark Plan and our requirements from those who want to invest in our borough.

With over 17,500 households on our own waiting list, and with many others struggling to find affordable properties to rent or buy, it is imperative that the council and its partners work tirelessly to find solutions and remain committed to maximising affordable housing through development. I am delighted that Southwark is leading the way in London on social rent, with 550 completions, the most in any London borough in 2023-24. But we still have much more to do in order to meet demand and this SPD sets out more detail on how our Southwark Plan policies can be implemented, including in relation to small sites and student accommodation. The SPD also provides more detail on intermediate housing options including our aspiration in Southwark to deliver Keyworker Homes and Community Land Trusts.



**Councillor Helen Dennis**

Cabinet Member for New Homes and Sustainable Development  
Southwark Council

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# CHAPTER 1

# INTRODUCTION

# 1. INTRODUCTION

This section provides an overview of the Affordable Housing Supplementary Planning Document. It sets out how this guidance should be used and who should be using it.

This SPD replaces the Affordable Housing SPD (2008) and draft Affordable Housing SPD (2011) and incorporates changes in national, regional and local policies. This SPD should be read alongside the council's Development Viability SPD (2016) and Draft Section 106 and CIL SPD (2024) (Subject to consultation).

## 1.1 Overview

The purpose of this Supplementary Planning Document (SPD) is to set out the council's approach to delivering affordable housing. This is a key objective of the Southwark Plan 2022, outlined in strategic policy SP1 'Homes for all'.

Southwark requires more affordable housing to meet the needs of all residents and to achieve the Council's strategic policies. This was established in the [Strategic Housing Market Assessment \(SHMA\) 2019](#). The SHMA demonstrated the local need for more affordable housing, both social rented and intermediate.

The purpose of this SPD is to:

- Support the implementation of Southwark Plan 2022 strategic policy SP1 'Homes for all'
- Provide clear definitions of what is considered affordable housing
- Set out the hierarchy for the delivery of affordable housing, including for small sites and non-conventional housing
- Set out the Council's approach to assessing viability during the determination of planning application and in viability reviews
- Set out the standards for the housing mix and tenure of affordable housing
- Set out the expectations for the design and management of affordable housing
- Set out monitoring arrangements to retain affordable housing

## 1.2 What development does this SPD apply to?

This SPD applies to all housing development (including new build, change of use, conversions and extensions) with a policy requirement for affordable housing. It provides detailed guidance about how decisions on planning applications will be made.

This includes:

- Social rented housing
- Intermediate housing
- Key worker housing
- Small sites development
- Self and custom build development
- Community Land Trusts (CLTs)
- Purpose built student accommodation
- Houses in Multiple occupation (HMOs)
- Wheelchair accessible housing

## 1.3 Policy context

This SPD provides guidance for applying the policies in the Southwark Plan 2022. It does not contain new policy. The SPD is a material consideration in the determination of a planning application.

The Southwark Plan 2022 together with the London Plan 2021 is the development plan for Southwark. The Southwark Plan 2022 is in conformity with the London Plan 2021 and the National Planning Policy Framework (NPPF) 2023.

### 1.3.1 National policy

#### *National Planning Policy Framework (NPPF)*

The National Planning Policy Framework (NPPF) requires local planning authorities to formulate planning policies to meet the needs of different groups in their local area, including people who need affordable housing. These policies should specify the type of affordable housing required.

### 1.3.2 Regional policy

#### *The London Plan 2021*

The London Plan 2021 provides the regional spatial development framework for London and outlines policy principles for affordable housing. This is set out in the planning policies and associated London Planning Guidance (LPG) and Supplementary Planning Guidance (SPG) documents.

The London Plan 2021 contains the following relevant policies:

- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public realm
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H7 Monitoring of affordable housing
- H8 Loss of existing housing and estate redevelopment
- H10 Housing size mix
- H11 Build to rent
- H13 Specialist older persons housing
- H15 Purpose-built student accommodation
- H16 Large-scale purpose-built shared living

Other relevant policy documents are:

- Affordable Housing and Viability SPG (2017)
- Affordable Housing LPG (draft 2023)
- Development Viability LPG (draft 2023)
- Housing Design Standards LPG (2023)
- Housing SPG (2016)

### 1.3.3 Local policy

#### *Southwark Plan 2022*

The Southwark Plan 2022 contains multiple relevant policies, for which this SPD provides further guidance:

- SP1 Homes for all
- P1 Social rented and intermediate housing
- P2 New family homes
- P4 Private rented homes
- P5 Student homes
- P6 Purpose-built shared living
- P7 Housing for older people
- P8 Wheelchair accessible and adaptable housing
- P9 Houses in multiple occupation
- P15 Residential design

Other relevant policy documents are:

- 2015 Technical Update to the Residential Design Standards (2011)
- Development Viability SPD (2016)
- Section 106 and CIL SPD (2015, updated 2020)
- Draft Section 106 and CIL SPD (2024) (Subject to consultation)

#### *Area Action Plans (AAPs)*

- Draft Old Kent Road Area Action Plan (2020)

# **CHAPTER 2**

## **AFFORDABLE HOUSING DEFINITIONS**

## 2. AFFORDABLE HOUSING DEFINITIONS

This purpose of this chapter is to explain what the council recognises as affordable housing. The framework is set out in the Southwark Plan 2022, which has the strategic objective of providing new homes in the borough, more of which should be affordable.

Under policy P1 of the Southwark Plan 2022 ‘Social rented and intermediate housing’, two types of affordable housing are acceptable:

- **Social rented housing:** This is housing at rental levels determined through the rent regime. This is set annually and is usually based on the government’s guideline rent formula.
- **Intermediate affordable housing:** This is housing sold at prices or subject to rents higher than those of social rented but below private housing prices or rents.

Social rented and Intermediate affordable housing is made available from the council, a registered provider or other affordable housing provider.

The London Plan 2021 sets the framework for household income thresholds for social rented and intermediate housing. These are based on average household incomes and average house prices across London and are updated annually. Households earning above these income thresholds are not eligible for affordable housing.

Table 1 outlines the affordable housing which the council considers to meet the genuine needs of our residents. Full definitions are in sections 2.1 and 2.2.

Table 1: Genuinely affordable housing

<b>Social rent</b>	<b>Accepted</b>
<b>Shared ownership</b>	<b>Accepted</b>
<b>London Living Rent</b>	<b>Accepted</b>
<b>Key worker housing</b>	<b>Accepted</b>
<b>Community Land Trusts (CLTs)</b>	<b>Accepted</b>
<b>Discount market sale</b>	<b>Accepted</b>
London Affordable Rent	NOT accepted
Affordable rent	NOT accepted
Discount market rent	NOT accepted

## 2.1 Social rented housing

Social rented housing is typically most needed by households on lower incomes who cannot afford to pay market prices for suitable housing.

To be considered social rented housing, it must:

- Fix rents for properties let at '**social rent**'. This is set by the [Regulator of Social Housing](#).
- Fix rents and service charges which should not exceed 40% of net household income.
- Determine access to social housing on housing need; and
- Provide in perpetuity (unless purchased through Right to Buy) to ensure that all homes remain permanently, solely and exclusively available to meet the identified social rented housing need.

## 2.2 Intermediate Housing

The intermediate sector plays an important role in filling the gap between the social and affordable rented sectors and the open market. Households below certain income thresholds may not necessarily be able to afford to buy or rent suitable and satisfactory housing in Southwark but may be eligible for intermediate housing.

The council considers the following intermediate housing to meet the genuine needs of our residents:

### Shared ownership

This involves homes which are part-owned and part-rented. Buyers purchase an initial share of at least 25% and can 'staircase' to full ownership. This means they can buy more shares over time until they own the property outright. Rent is paid on the part-rented share and is subject to caps below the market level.

Households with incomes of between £60,000 and £90,000 have needs that can be met through Shared Ownership homes (provided the market value of a Shared Ownership home does not exceed £600,000).



### **London Living Rent**

London Living Rent is a type of ‘genuinely affordable’ housing funded by the Mayor. London Living Rent is designed to help people transition from renting to shared ownership.

London Living Rent homes will be offered on tenancies of a minimum of three years. By offering a below-market rent, tenants are supported to save money and given the option to buy their home on a shared ownership basis during their tenancy.

The GLA publishes benchmark London Living Rent levels for every neighbourhood in the capital, updated annually. These are based on a third of average local household incomes and adjusted for the number of bedrooms in each home. To ensure family-sized London Living Rent homes are affordable, the rent for a 3-bedroom home will be set at no more than 10% above the 2-bedroom rent.

There is flexibility to allow for rents to be set below the GLA benchmark. Rent levels must not exceed the benchmark, however, at the time of each new tenancy.

### **Key Worker Housing (KWH)**

This is rental housing which is only available to those employed in recognised key worker occupations (the full definition of key workers is provided in fact box 1).

Key workers perform essential work and are critical to many important services in the borough and in London. Key workers need to live a reasonable distance to their place of employment to ensure these services run efficiently. Many keyworkers are unable, however, to secure housing on the private market and face long waiting times for social rented homes.

The KWH is based on tenancies of 2-5 years. The housing must remain available as key worker housing in perpetuity. A marketing and management plan is required for KWH as a condition of the planning permission.

To access GLA affordable housing grant funding, KWH should be provided at rent levels (including service charge) equivalent to those defined at the maximum benchmark ‘London Living Rent’ for each London neighbourhood.

As well as current occupation, the tenancies are subject to additional eligibility criteria. The whole household (which can be formed of two or more unrelated households or sharers) must not have a maximum combined gross income exceeding £90,000; and minimum combined income of £26,000. These thresholds will be reviewed annually.

Members of the household must also not be an existing homeowner, unless the current property is unsuitable and the household is unable to buy in the private market. Examples of a property being unsuitable include, but are not limited to; overcrowding, being unaffordable or it being unable to meet accessibility requirements.

Tenancies can be monitored to ensure ongoing compliance with KWH criteria. Additional eligibility criteria may also be set by the council where necessary.

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### Fact box 1: Key workers occupations

The Council's definition of key workers has been produced based on evidence of recruitment and retention issues in Southwark. It follows the GLA's definition of essential workers but has been tailored to reflect specific conditions in Southwark.

The following occupations will be considered key workers:

- Nurses, doctors, and other clinical staff employed by NHS
- Firefighters
- Teachers/teaching assistants (from non-fee charging schools)
- Social workers, educational psychologists and therapists delivering services for the Council
- Police officers/Police Community Support officers (PCSO).

### Community Land Trusts

Community Land Trusts (CLTs) are recognised within the Southwark Plan 2022 as provider of intermediate affordable housing.

Community Land Trusts (CLTs) are non-profit organisations that own and develop land for the benefit of the community. CLTs encourage the involvement of community-led housing organisations who are looking to create permanently affordable housing to meet local housing needs.

Where a CLT will propose to deliver genuinely affordable homes, we will require that they remain affordable in perpetuity.

All community-led development schemes must demonstrate how they will be managed and financially viable over the long-term. The schemes must also set out how the homes will benefit the local community and how these benefits can be retained in perpetuity.

### Discount market sale

This is housing which is for sale at least 20% below open market equivalent. The discount should be sufficient to ensure the homes are affordable or accessible to those with household incomes within the GLA thresholds. Discount market sale homes are restricted to eligible households and should remain affordable in perpetuity..

## 2.3 Not accepted affordable housing

The council does not consider the following housing to be genuinely affordable:

### London Affordable Rent (LAR)

London Affordable Rent levels are set by the GLA. These benchmarks are not genuinely affordable in Southwark and inner London. Therefore, the Council does not accept LAR as social rented or intermediate housing.

### Affordable rent

The Government defines 'affordable rent' as up to 80% of market rates. These rates are not genuinely affordable for Southwark residents. Therefore, the Council does not accept Affordable Rent as social rented or intermediate housing.

### Discount market rent

This is housing which is for rent at least 20% below open market equivalent. These rates are not genuinely affordable for Southwark residents. Therefore, the Council does not accept discount market rent as social rented or intermediate housing.

# **CHAPTER 3**

# **SECURING AFFORDABLE HOUSING**

## 3. SECURING AFFORDABLE HOUSING

The Southwark Plan 2022 policy P1 'Social rented and intermediate housing' sets out the council's approach to securing affordable housing contributions. This includes the thresholds for providing affordable housing as well as the contributions which are required. The amount of affordable housing required will be calculated by habitable rooms (see fact box 2).

There are different eligibility thresholds and requirements for providing affordable housing depending on the scale of development. This is split between developments creating 10 or more homes and developments creating 9 homes or fewer (inclusive). There are also different requirements for development located on public land, on Locally Significant Industrial Sites (LSIS) and in the Aylesbury Area Action Core.

The expectation is that affordable housing should be delivered onsite unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The agreed approach must also contribute to the objective of creating mixed and balanced communities.

Applicants are required to submit a viability assessment with their planning application to ensure that the maximum proportion of affordable housing is negotiated on each development. The council's approach to viability testing is set out in section 4 of this SPD.



### Fact box 2: Habitable rooms

A habitable room is defined as a room with a window within a dwelling that is intended to be used for sleeping, living or dining, regardless of what it is used for.

This definition is set out in the fact box under Southwark Plan 2022 policy P1 'Social rented and intermediate housing'. This excludes enclosed spaces such as bath or toilet facilities, corridors, landings, hallways, lobbies, utility rooms, and kitchens with an overall floor area of less than 11sqm.

Any floor area where the ceiling height is less than 1.5 metres will not count towards the habitable floorspace. Any room that is over 28 sqm will be counted as two habitable rooms, in line with the calculation set out in policy P1.

### 3.1 On-site delivery of affordable housing

The general presumption is that affordable housing should be provided on-site. This follows the council's hierarchy for the delivery of affordable housing.

The council will secure affordable housing in a legal agreement. This would normally cover the following issues:

- The total amount of affordable homes to be provided (by number of affordable housing units and number of habitable rooms)
- The tenure split between social rented and intermediate homes
- The location of the affordable homes within the development
- The size of the affordable homes
- Details of any affordable wheelchair units to be provided, including the amount, the tenure and the specific standards. Standards expected of wheelchair housing are set out in Policy P8 'Wheelchair accessible and adaptable housing'
- The affordability thresholds that apply. Housing will have to be provided in compliance with the criteria outlined in section 2.
- That no more than 50% of the market units within the development can be occupied before the affordable housing units are completed and handed over to the registered provider.
- Local authority nomination rights.
- Details on any potential service charges, where necessary

What is required will depend on what the council considers is necessary to assist in mitigating the impact of unacceptable development to make it acceptable in planning terms i.e. is necessary, directly related to the development and fairly and reasonably related in scale or kind to the development in accordance with regulation 122 Community Infrastructure Levy Regulations 2010 (as amended).

## 3.2 Off-site delivery of affordable housing

In some cases, affordable housing may be delivered off-site. This is only considered acceptable when the affordable housing cannot be delivered on-site, and an appropriate location has been identified near to the proposed development.

Applicants must robustly justify off site affordable housing through an open book financial appraisal. This must provide a robust justification for off-site provision of affordable housing and how the approach contributes to the objective of creating mixed and balanced communities. Any financial benefit to the applicant due to off-site delivery will not be permitted.

Where off-site delivery of affordable housing is provided, this will be required in addition to any on-site affordable housing requirement the site would have been required to deliver itself (i.e. it must result in a net gain of affordable housing units).

To be considered off-site affordable housing for the main development, applicants must have secured planning permission prior to any occupation of the market housing on the main development. No more than 50% of the market units within the main development can be occupied before the affordable housing units off-site are completed and handed over to the registered provider.

### 3.3 Payments in lieu of affordable housing

#### Developments creating 10 homes or more

In exceptional circumstances, developments creating 10 homes or more may provide a financial contribution in lieu of delivering affordable housing on or off-site. The contribution must be based on the estimated cost of providing the required amount of social and intermediate housing on-site.

This will only be accepted where the payment in lieu can be robustly justified over on-site or off-site provision. This approach must also contribute to the objective of creating mixed and balanced communities. This is in accordance with the NPPF paragraph 64.

The payment in lieu should not provide a financial benefit to the applicant. This should be demonstrated by a viability assessment by showing the value of the site with and without the affordable element being provided. Applicants will also need to set out why the delivery of affordable on or off-site was not possible.

The following formula sets out the starting point for calculating payment in lieu contributions. This is in accordance with Policy P1 of the Southwark Plan 2022 which requires developments creating 10 homes or more to provide 35% minimum contribution towards affordable housing.

The final payment will be determined through the viability assessment process.

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#### **Fact box 3: Formula for payment in lieu per habitable room for developments creating 10 homes or more**

The formula for the payment in lieu per habitable room is:

*Number of habitable rooms × 0.35 (minimum provision) × £ per habitable room in the specific CIL value area.*

The specific value for each CIL zone is set out in the draft S106 and CIL SPD (2024).



### Developments creating 9 homes or fewer (inclusive)

Developments creating 9 homes or fewer (inclusive) may provide a payment in lieu. The financial contribution may be provided without needing to follow the Council's hierarchy for affordable housing delivery. This means applicant do not need to demonstrate why the delivery of affordable housing was not possible on or off-site, as required for major developments. Any contribution due will be determined in accordance with a viability assessment, as set out in section 4.3 of this SPD.

## 3.4 100% or mainly single tenure schemes

The Council receives applications for developments that are predominantly affordable housing or 100% affordable housing. This helps to deliver a significant amount of new affordable homes.

A tenure split between social rented and intermediate applies to affordable housing schemes as set out in Policy P1.

In cases where the required tenure split cannot be provided, the applicant must demonstrate the need for the scheme and the specific tenure mix. This would need to be demonstrated as part of a viability appraisal.

In these cases, the Council would normally decide the appropriate tenure within the affordable housing by taking account of:

- The site location, and the existing levels of affordable housing on site and in the area
- The need to create a mix and choice of housing across the borough
- The proposed tenure and affordability
- The direct and indirect benefits to the wider community
- The objective of creating mixed and balanced communities.
- If a Community Land Trust, the demonstration of the wider benefits, not only the members of the CLT whom it serves.

Applicants are encouraged to engage with the council at an early stage in their preparation.

Table 2: Types of residential development which are liable for a financial contribution

Typology	Affordable housing contribution payable and method of calculation
Extension to the existing residential development that does not create any new unit(s)	<p><b>No requirement</b> to provide affordable housing under policy P1.</p> <p>No financial contribution.</p>
Converting two or more homes to one home (de-conversions)	<p><b>No requirement</b> to provide affordable housing under policy P1.</p> <p>No financial contribution, this is to be treated as a deconversion.</p>
Self-Build properties (unless the property is put on the market within three years of occupation)	<p><b>No financial contribution, unless</b> the property is put on the market for sale within 3 years of first occupation.</p> <p>The calculation of the affordable housing contribution, and a viability appraisal and a legal agreement will still be required.</p>
Change of use from a House in Multiple Occupation (HMO) (Sui Generis or C4) to a single C3 dwelling.	<p><b>No requirement</b> to provide affordable housing under policy P1.</p> <p>No financial contribution, this is to be treated as a deconversion.</p>
Extension to existing residential buildings to create additional new unit(s) (without conversion of the existing dwelling)	<p><b>Yes.</b> Calculate the affordable housing contribution on the basis of 35% of the habitable rooms of the entire development.</p>
New build construction of new dwellings on vacant land. These include infills and new dwellings in rear gardens	<p><b>Yes.</b> Calculate the affordable housing contributions on the basis of 35% of the habitable rooms of the entire development.</p>
Change of use and conversion to dwellings (including with extensions)	<p><b>Yes.</b> Calculate the affordable housing contributions on the basis of 35% of the habitable rooms of the entire development.</p>

Conversion / subdivision of existing dwellings without extensions	<b>Yes.</b> Calculate the affordable housing contribution on the basis of 35% of the habitable rooms of the entire development.
Demolition and the re-provision of additional unit(s)	<b>Yes.</b> Calculate the affordable housing contribution on the basis of 35% of the habitable rooms of the entire development.

# **CHAPTER 4**

## **VIABILITY ASSESSMENTS AND REVIEWS**

## 4. VIABILITY ASSESSMENTS & REVIEWS

The Southwark Plan 2022 policy P1 'Social rented and intermediate housing' sets out the Council's approach to viability. This is also set out in the GLA's Affordable Housing and Viability SPG (2017) and Council's Development Viability SPD (2016). The Council will apply the same viability approach to developments that create 9 homes or fewer (inclusive) as with developments of 10 homes or more.

This includes the two viability routes: the fast-track route or the viability tested route. The approach varies where developments of 9 homes or fewer (inclusive) can provide a financial contribution instead of delivering on-site or off-site affordable housing.

There are separate approaches for other types of residential such as self and custom builds and Community Land Trusts (CLTs).

### Submitting an application

An application going through the viability tested route will not be accepted as valid unless a complete financial viability assessment (and its public executive summary) has been submitted.

Applicants must meet the cost of the council reviewing any financial viability appraisals or provide a solicitor's undertaking to pay for an application requiring a financial viability appraisal.

Where a registered provider is delivering or taking on the affordable housing, their details and confirmation of their involvement should be provided in the application. The registered provider's requirements are expected to have been designed into the scheme and early engagement is encouraged.

The council offers a formal pre-application advice process which applicants are encouraged to use. This lets applicants discuss proposals with the council before submitting a planning application. This will help to make the planning process more efficient by allowing the identification and resolution of any potential issues before the application is submitted.

## 4.1 Fast-track route

Policy P1 of the Southwark Plan 2022 sets out that developments may follow the fast-track approach where eligible. This is underpinned by the London Plan 2021 policy H5 'Threshold approach to applications'.

Where developments follow the fast-track route, they will not be subject to a viability assessment. Viability assessments may be required however if amendments are made following the grant of permission. Legal agreements will also be used where necessary to cover other matters relating to affordable housing.

There are different eligibility thresholds for the fast-track route depending on the scale of development. This is split between developments creating 10 or more homes and developments creating 9 homes or fewer (inclusive). There are also different requirements for development located on public land, Locally Significant Industrial Sites (LSIS) and in the Aylesbury Area Action Core.

Schemes which are ineligible for the fast-track route must go through the viability tested route.

An Early-Stage review will be required for fast-track developments if an agreed level of progress has not been made in constructing the development. This would be triggered after two years of the permission being granted, or within a timeframe otherwise agreed upon. This is to ensure an applicant fully intends to build out the permission. Further guidance on review mechanisms is set out in section 4.5 of this SPD.

## 4.2 Viability tested route

Policy P1 sets out the requirement for viability assessments for developments not following the fast-track route. This applies to all developments not following the fast-track route, whether creating 9 homes or fewer (inclusive) or 10 homes or more. This is to ensure a maximum level of affordable housing is secured. A site-by-site assessment will be undertaken, taking account of individual circumstances of development viability.

Assessments must be published for public scrutiny and should identify the maximum amount of affordable housing (or financial contribution in the case of developments of 9 homes or fewer) which can be delivered. Assessments must be prepared in line with the Council's guidance, without which applications will not be made valid.

The applicant is required to meet the cost of the Council having the viability assessment reviewed. This includes any subsequent reviews, including if an application has been refused and is subject to an appeal. An application will be refused if the applicant fails to pay for the Council's review as this means the viability information cannot be assessed.

A Section 106 agreement or unilateral undertaking will be required to ensure the affordable housing contribution (plus the administration fee) is paid to the Council on implementation of the main development's residential units. Different triggers for payment may be agreed if found to be justified and supported by the Council's viability analysis.

Viability review mechanisms will also be required to ensure that affordable housing delivery increases if the viability of a site improves over time. Further guidance on review mechanisms can be found in section 4.5 of this SPD.

For smaller developments of 1-2 residential units, the council may impose a reduced time limit on implementing planning permission. This can remove the need for subsequent viability reviews as the timeframe of development is shorter.

### 4.3 Section 73 applications

An updated viability assessment may be required for applications submitted under Section 73 of the Town and Country Planning Act 1990.

For example, where:

- There has been an amendment to the number of residential units
- The tenure mix has been varied and deviates from the original planning permission
- There has been a change to the development which could reasonably affect the viability (including a change of use to residential that could alter the viability position)
- There has been a change in circumstance which the Council considers could affect the viability of the scheme.

A Deed of Variation may be required where changes to the planning obligations are needed to make the s73 application acceptable in planning terms.

## 4.4. Self build and custom housebuilding

The terms 'self-build' and 'custom housebuilding' cover various ways that individuals can build their own homes.

The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) provides a legal definition of self-build and custom housebuilding. The Act does not distinguish between self-build and custom housebuilding. It states that both are where an individual, an association of individuals, or persons working with or for individuals, build or complete houses to be occupied as homes by those individuals. For the purposes of this SPD, the term self-build will be used,

Self-build homes will only be liable for a financial contribution towards affordable housing if the property is advertised for sale or sold within 3 years of first occupation. The contribution is determined at the point of application. It will be payable at the point of sale of the home. A review mechanism will only be required if a policy compliant contribution is not secured at the planning stage.

To ensure the home meets the self-build definition, the Council must be satisfied that:

- The application complies with the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) and accompanying Government guidance.
- The initial owner of the home will be (or has been) the primary decision maker regarding the final design and layout. In some cases, individuals are involved in building or managing the construction of their home from the start to the end. In other cases, individuals may commission the home to be built but make some key design decisions.
- The applicant will be the occupant of the property for at least the following 3 years.

If the above criteria are not met, the council will not consider the development to be self-build for planning purposes. This means the development will be liable for a financial contribution, as per policy P1 (see fact box 4).



### Fact box 4: Formula for payment in lieu per habitable room for self-build

The formula for the payment in lieu per habitable room for self-build is:

$$\text{Number of habitable rooms} \times 0.35 \times \text{£}30,000$$



## 4.5 Viability review mechanisms

Review mechanisms allow the council to re-appraise the viability of a development to ensure that the maximum affordable housing contribution is secured. They allow for additional affordable housing contributions to be secured should the viability and value of a development improve. This is measured from the date of planning permission to specific stages of the development programme (depending on the type of review).

Affordable housing contributions cannot be revised downwards by review mechanisms. This means the affordable housing contributions cannot decrease because of the review. The cost of reviews must be met by the applicant.

Review mechanisms may include one or more of the following:

- An early-stage review
- One or more mid-term reviews (for larger phased schemes; or where progress following an early-stage review has not been met).
- A late-stage review

Review mechanisms can encourage the build out of schemes, as they can be triggered if an agreed level of progress is not made in constructing the development.

The council will use an early-stage reviews for major schemes, if sufficient progress has not been made in construction. This would be triggered after two years of the permission being granted, or within a timeframe otherwise agreed upon.

Last stage review mechanisms will be used on all schemes which do not meet the policy compliant sum using a set formula, depending on the deficit. Contributions determined under the Late-Stage Review will be capped at the equivalent of 50 per cent affordable housing provision.

Applicants should refer to the GLA's guidance on review mechanisms for further detail on how and when these are used. This can be found in the Affordable Housing and Viability SPG (2017). The council will follow the guidance set out in this SPG when conducting and imposing review mechanisms.

# **CHAPTER 5**

# **NON-CONVENTIONAL HOUSING**

## 5. NON-CONVENTIONAL HOUSING

### 5.1 Purpose-built student accommodation (PBSA)

All developments of purpose-built student accommodation (PBSA) must provide affordable housing or a financial contribution in lieu. This ensures the need for student accommodation is balanced against the need for affordable housing. This is set out in the Southwark Plan 2022 policy P5 'Student Homes' and conforms with the London Plan 2021 policy H15 'Purpose-built student accommodation'.

London Plan 2021 Policy H15 also states that PBSA must contribute to a mixed and inclusive community at the neighbourhood level. The extent to which this policy requirement has been addressed will be a consideration in the determination of PBSA schemes.

There are two avenues for the provision of student housing in Southwark:

- **Nomination schemes:** These schemes have an agreement with a higher education institution.
- **Direct let schemes:** These schemes do not have a nomination agreement with a higher education institution.

Each avenue has its own requirement for the provision of affordable housing contributions. The contributions include the provision of affordable student rent. This is defined by the GLA as costing no more than 55% of the maximum Qualifying Maintenance Loan for a student living in London. The actual amount for the coming academic year is published in the GLA's Annual Monitoring Report.

## 5.2 Houses in Multiple Occupation (HMOs)

The Southwark Plan 2022 policy P9 'Houses in multiple occupation' acknowledges the role of Houses in Multiple Occupation (HMOs) in meeting the need of some residents and reducing the pressure on conventional housing stock.

There are two categories of HMOs under the Use Class Order:

- A small HMO is defined as a property that is occupied by between 3 and 6 unrelated individuals who share basic amenities such as a kitchen or bathroom.
- A large HMO is defined as a property that is occupied by more than 6 unrelated individuals that share basic amenities such as a kitchen or bathroom. A large HMO is classified as Sui Generis under the Use Class Order.

The Council controls the development of HMOs to ensure they are spread out appropriately across the borough and there is not an overconcentration of HMOs in areas. There can be negative impacts arising from an overconcentration of HMOs in an area including increased noise, pressure of local community facilities or stress on waste management.

HMOs are liable for contributions towards affordable which can be provided as a financial payment. HMOs are not expected to deliver affordable housing on or off-site as expected from larger developments. HMOs must submit a viability assessment to justify the maximum viable approach has been taken (see section 4 of this SPD). This is in accordance with policy P9 and P1.

This requirement is for all categories of HMO (small and large). This includes new build HMOs and HMOs resulting from the change of use of either a non-residential or residential use.

## 5.3 Other forms of self and non-self-contained housing

Form	Relevant policy	Use class and triggers	Affordable housing requirements
Older people housing	P7	C2, C4 and Sui Generis	Affordable housing delivery will be required preferably on site.
Co-living		Sui generis More than 100 units	Affordable housing delivery will be required
Build to Rent (PRS)	P4	C3; >100 homes <100 homes	In accordance with P1, must provide Discount Market Rent at social rent equivalent.

# **CHAPTER 6**

## **DESIGN AND MANAGEMENT OF AFFORDABLE HOUSING**

# 6. DESIGN AND MANAGEMENT OF AFFORDABLE HOUSING

## 6.1 Registered Providers

Social and intermediate housing can be delivered by bodies known as Registered Providers (RPs). RPs are organisations which are registered with the Regulator of Social Housing. The Regulator manages the statutory register of social housing providers (the register) which lists private (non-profit and profit-making) providers and local authority providers. Most RPs are housing associations, but they can also be trusts, co-operatives and companies.

The council also holds and updates an approved list of RPs of social housing. The list of council approved RPs will be reviewed on a regular basis and the most up to date version will be available on our website. Other Affordable Housing Providers that are not on our list of RPs will need to be approved by the council in writing. RPs looking to be included on the list should contact the council.

The council will use legal agreements to ensure housing remains affordable in perpetuity (where relevant depending on the affordable housing). This is in line with the National Planning Policy Framework. Clauses in the legal agreements will also require the developer to confirm and notify the Council who the RP is.

## 6.2 Service charges

Service charges are costs that are charged to leaseholders by property managers to cover the provision of services to a building. The charges may also be paid by tenants to a landlord, usually in addition to rent.

The charges can include, but are not limited to:

- General maintenance and repairs
- Insurance of the building
- Central heating for communal areas
- Lifts
- Lighting
- Cleaning of common areas.

The charges may also include the cost of managing the building by a property manager or agency.

It is important that service charges are kept affordable for residents, especially those in affordable housing. Residents often have little control over service charge increases and can find themselves no longer able to afford the costs over time. Service charges can increase over the lifespan of a development due to poor design, maintenance or building management. Excessive services being provided may also lead to increased or unaffordable charges.

### **Design**

Good design is paramount to keeping service charges affordable. High quality and sustainable materials will help to minimise the need of repairs and ongoing costs. Poorly designed developments can require more work and regular maintenance, impacting the affordability of the housing for its residents. Where affordable homes are provided in a development, applicants must demonstrate a high quality of design will be delivered.

### **Management**

Developers and Registered Providers must use reasonable endeavours to minimise any Service Charges in respect of the Affordable Housing Units. The amount of the service charges should not be more than the actual costs reasonably incurred with providing the service.

Applicants are encouraged to follow good practice guidance such as the [GLA's Service Charge Charter](#). The GLA charter encourages transparency, ensuring residents are provided with the information they need to understand service charges. The Charter also emphasises the need for affordability, good design and providing residents an opportunity to challenge service charges where necessary. Early engagement with Registered Providers is encouraged to ensure that their requirements can be factored into the design of the development.

### **Monitoring service charges**

The council may seek to be notified of the service charge cost for any social rented homes within a development. This would start from the date of first occupation and continue annually.

Restrictions may also be placed on increasing service charges. This would require the service charge for social rented homes to be lower than either the Service Charge Cap set or determined in accordance with the Rent Standard.

The council will take account of service charges when considering the viability of a development.

### 6.3 Tenure blind design

The Council expects affordable housing to be designed tenure blind. This means the design of the affordable housing should be indistinguishable from the market housing. The affordable housing should share the same standard of design as any market housing and share the same access arrangements as far as is practical.

There should be no difference between the appearance and quality of the affordable units and market units. Affordable and private tenants should have equal access to communal facilities such as shared amenity and parking areas.

### 6.4 Mortgagee in Possession Clause (MiPC)

The Mortgagee in possession clause (MiPC) is a fundamental clause to a Registered Provider's (RP) ability to secure funding for Shared Ownership leases. The council will require it to be included in all bilateral agreements made or unilateral undertakings offered under section 106 Town and Country Planning Act 1990.

The clause becomes operative in circumstances where a RP defaults on loan payments or any other terms. A mortgagee (or other relevant funding party) takes control of the RP interest in the affordable housing units as assets against which their loan is secured.

The GLA have produced a standard Mortgagee in Possession (MIP) clause in order to promote a consistent approach across London and facilitate Registered Providers to leverage sufficient levels of finance to increase the delivery of affordable homes.

The GLA MIP clause provides for any circumstance where a Registered Provider defaults on loan payments or any other terms. The clause allows for the council or another RP to purchase the affordable housing units within a specified 3 month 'moratorium period' that is satisfactory to major bank lenders. This is set out in the S106 agreement and is a contractual arrangement. If after three months the homes remain unsold then the mortgagee (usually a bank that has financed the Registered Provider) can sell the S106 housing and the requirements for it to be affordable contained in the S106 will no longer apply.

A robust financial case must be set out the Registered Provider if it does not want the Council to include the GLA's standard clause.



# **CHAPTER 7**

## **MONITORING OF AFFORDABLE HOUSING**

## 7. MONITORING OF AFFORDABLE HOUSING

Monitoring is essential to ensure that affordable homes are secured, delivered and retained in accordance with policy requirements and their legal agreements. Through monitoring, the Council can assess and enforce upon developers that are found to be in breach of their legal agreements.

The council also monitors and reviews the provision of affordable housing in the borough. This checks that affordable housing has remained affordable, and the correct provision has been delivered, which is set out in this chapter.

The Council monitors to ensure that, where appropriate:

- Developers are delivering and allocating the correct number of homes and habitable rooms as affordable housing
- Homes are being rented at an appropriate affordable level
- Affordable family homes are being provided
- To track any homes that may no longer be in intermediate tenure, for example where a Shared Ownership unit has staircased to become a private market unit.

The Council uses legal agreements and an annual audit as part of the monitoring process. Monitoring also happens at certain trigger points of the development process.

The Council uses legal agreements and an annual audit as part of the monitoring process. Monitoring also happens at certain trigger points of the development process.

## 7.1 Legal agreements

Planning obligations under section 106 Town and Country Planning Act 1990 will secure all of the requirements set out in this SPD.

This includes (but is not limited to):

- Affordable housing required to be delivered on site
- Any financial contribution due
- Any information that is required by the council to monitor compliance

These agreements will also secure any necessary viability reviews to ensure the maximum viable amount of affordable housing is being secured.

## 7.2 Affordable Housing Monitoring Schedule (AHMS) and annual audit

The Council undertakes an annual audit to ensure that homes secured within legal agreements are delivered. This ensures that homes are being adequately rented at an affordable level and the Council are aware of where these homes are within the borough.

The Affordable Housing Monitoring Schedule (AHMS) is a mandatory template which developers are required to complete. This will provide the necessary information for the Council's audit. The template sets out a simple and clear format for the return of the required information. The AHMS will be required as part of legal agreements where on-site affordable housing is proposed. The schedule requires all housing units within the development to be identified including wheelchair accessible homes.

Developers and/or Registered Providers are required to inform the Council of newly acquired affordable homes and any changes to existing homes held within the borough as part of the annual audit.

The AHMS requires information about the affordable housing, which will include details of:

- Tenure
- Number of bedrooms
- Flat size
- Weekly rent
- Service charge

The annual audit must be completed and submitted to the Council by the 31st March. The results of the audit will be published on the Council's website.

The council may also ask for any other information it deems necessary to assist with the monitoring of affordable housing.

# CHAPTER 8

# GLOSSARY

## 8. GLOSSARY

**Affordable housing:** Housing designed to meet the needs of households whose incomes are not sufficient to allow them to access decent and appropriate housing in their borough. Affordable housing comprises social and intermediate housing.

**Affordable Housing Providers:** Bodies which own and manage affordable housing. These could include registered providers and specialist private affordable housing managers.

**Build to rent:** Purpose-built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.

**Co-living / purpose-built shared living developments:** These are similar to student halls of residence but not restricted to students. Typically a collective living scheme will be a large block which provides a range of communal areas that fulfil different functions (such as libraries, kitchens, gyms, games rooms etc.) which are available to all residents. Residents typically rent a small en-suite bedroom. Unlike halls of residence, collective living is intended to be a primary residence

**Community Land Trusts:** nonprofit organisations that own and develop land for the benefit of the community, affordable in perpetuity

**Cluster flat:** Non-self-contained accommodation for temporary occupation by a specific user group such as students or nurses, where living and kitchen facilities are shared by a number of households.

**Density:** The amount of internal floor space of a building in relation to an area of land. For residential development, density is expressed as the number of units or habitable rooms per hectare.

**Development:** As defined by Section 55 of the Town and Country Planning Act 1990, development means carrying out building, engineering, mining or other operations in, on, over or under land, or changing the use of buildings or land.

**Habitable room:** A room within a dwelling, the main purpose of which is for sleeping, living or dining. It is any room with a window that could be used to sleep in, regardless of what it is actually used for. This excludes toilets, bathrooms, landings, halls and lobbies, and also excludes kitchens with an overall floor area of less than 11 square metres. Any floor area where the ceiling height is less than 1.5m will not count towards the habitable floorspace. Habitable rooms exceeding 28sqm will be counted as multiple habitable rooms, as set out in Southwark Plan policy P1.

**Heads of Terms:** A document setting out the particular items of a S106 agreement as agreed in principle between the council and developer. It is advisable for Heads of Terms to be agreed prior to committee or delegated officers making a “minded to approve” decision. Any subsequent reluctance on the developer’s part to adhere to agreed heads of Terms may justify a refusal of permission.

**HMO:** House in multiple occupation. These are dwellings which are shared by three or more tenants who form two or more households and share a kitchen, bathroom or toilet.

**Household:** One person living alone or a group of people (who may or may not be related) living or staying temporarily at the same address with common housekeeping.

**Intermediate Housing:** Sub-market housing which is above target rents, but is substantially below open market levels

**Key Worker Housing:** Housing product that is based at intermediate rent levels, that is reserved or allocated for people who are given priority by reason of their household income and their occupation, to ensure that workers are retained in essential public services. This includes those who work in health, education, police and emergency services.

**Live-work units:** The flexible use of buildings and spaces to allow both functions within them.

**London Living Rent:** A type of intermediate housing that is considered ‘genuinely affordable’, aimed at middle-income households.

**Local Plan:** A statutory plan produced by each local authority that integrates strategic and local planning responsibilities through policies and proposals for the development and use of land in their area.

**London Plan:** A strategic plan for the whole of London produced by the GLA. The main purpose of the London Plan is to ensure that all the individual plans produced by the London boroughs work together to meet the priorities that are agreed for the whole London region. The Local Development Framework cannot contain strategies or policies that are not in general conformity with the London Plan.

**Major developments:** Any residential or mixed-use development creating 10 or more dwellings, or if that is not known, where the site area is 0.5 hectares or more. For other types of development, a major development is one where the floorspace to be built is 1000 square metres or more, or the site area is 1 hectare or more.

**Mixed-use:** Development comprising one or more activities within the same building or site.

**National Planning Policy Framework (NPPF):** A policy document that sets out the government's planning policies for England and how these should be applied.

**Non- self-contained accommodation / non-conventional accommodation:** Residential accommodation where occupiers of different householders share living, kitchen or bathrooms facilities.

**Older People's Housing:** This refers to various types of specialised accommodation for older people, such nursing homes and extra-care housing. It also includes sheltered housing, consisting of self-contained individual apartments, almshouses and co-housing schemes.

**Planning obligations (or section 106 (s106) agreements):** These agreements confer planning obligations on persons with an interest in land in order to achieve the implementation of relevant planning policies as authorised by Section 106 of the Town and Country Planning Act 1990.

**Registered providers (RPs):** Housing providers that are registered with the Homes and Communities Agency. Most RPs are housing associations, but some RPs are trusts, co-operatives and companies.

**Shared Ownership:** A tenure that allows households who cannot afford to buy a home outright the opportunity to part buy and part rent a home. Residents buy a minimum share of 10% in their home, depending on what they can afford, and pay rent on the share that they don't buy. The bigger the share that is purchased, the less rent has to be paid on the remaining part of the property.

**Southwark Plan:** See "Local Plan"

**Small sites:** Sites below 0.25 hectares in size; or which proposes 9 (inclusive) or less residential units.

**Social rented housing:** Housing that is available to rent either from the Council, a registered provider, or another affordable housing provider. Social rented housing is set at an affordable rent based on local incomes.

**S106 agreements:** See “Planning obligations”

**Self-build and custom-build housing:** Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing.

**Staircasing:** A system that allows residents in shared ownership housing to buy more shares on their property as they can afford them until eventually they own their home outright.

**Studio flat:** A no-bedroom residential unit which has a separate bathroom and kitchen but shared bedroom and living area.

**Supplementary Planning Document (SPD):** A document that expands upon and provides further guidance on how planning policies in the Southwark Plan should be applied. Once adopted, an SPD will become a material consideration when considering planning applications in Southwark and is regularly monitored and reviewed.

**Sustainability Appraisal/ Strategic Environmental Assessment:** A systematic and interactive process undertaken during the preparation of a plan or strategy, which identifies and reports on the extent to which the implementation of the plan or strategy would achieve environmental, economic and social objectives by which sustainable development can be defined, in order that the performance of the strategy and policies is improved.

**Sustainable Development:** At a high level, sustainable development means meeting the needs of the present without compromising the ability of future generations to meet their own needs. Within the planning system, sustainable development means achieving economic, social, and environmental objectives.

**Unilateral undertakings:** Instead of agreeing obligations through the standard process of negotiation and agreement between the council and developer. Developers may prepare the terms of a planning obligation on their own, without prior discussion with the council. These will then be submitted to the council. If the terms are acceptable the fact that the document has not been negotiated should not in itself be seen as a bar to the grant of permission. Where any unilateral undertaking does not meet the council’s objectives permission should be refused.







# Consultation plan

**Affordable Housing Supplementary Planning Document (SPD)**

## CONTENTS

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# 1. Introduction

The purpose of the SPD is to set out the council's approach to delivering affordable housing. This is a key objective of the Southwark Plan 2022, outlined in strategic policy SP1 'Homes for all'.

The guidance in this SPD is relevant to all housing development (including new build, change of use, conversions and extensions) with a policy requirement for affordable housing. It provides detailed guidance about how decisions on planning applications will be made.

This SPD provides further guidance for applying the policies in the Southwark Plan 2022. It does not contain new policy. The SPD will be a material consideration in determining a planning application.

The SPD has the following objectives:

- Support the implementation of Southwark Plan 2022 strategic policy SP1 'Homes for all'
- Provide clear definitions of what is considered affordable housing
- Set out the hierarchy for the delivery of affordable housing, including for small sites and non-conventional housing
- Set out the Council's approach to assessing viability during the determination of planning application and in viability reviews
- Set out the standards for the housing mix and tenure of affordable housing
- Set out the expectations for the design and management of affordable housing
- Set out monitoring arrangements to retain affordable housing

## 1.1 The purpose and objectives of this plan

The process of preparing the SPD needs to involve local community groups, residents and landowners to ensure that it meets the needs of those living in Southwark.

The purpose of this consultation plan is to make sure that we involve local people in preparing these documents in a way that considers their needs. There are minimum legal requirements for consultation we need to follow, seen in sections 2 and 3 below.

## **2. How we are consulting**

We carry out consultation in accordance with our adopted Statement of Community Involvement (2022). This explains how we will consult local people in the preparation of planning policy documents. The following section sets out how we plan to meet the minimum statutory consultation requirements and how we will exceed these requirements where appropriate.

In the current stage of consultation, we will invite members of the public and other stakeholders to make representations on the draft Affordable Housing SPD.

Further details of the next steps are set out in section 5.

## 3. The timetable and methods of consultation

### 3.1 Consultation timeframe

In accordance with Southwark's statement of community involvement (SCI), the draft SPD will be available for comment for a minimum of twelve weeks. Additional time will also be added to the consultation to account for the summer period.

The consultation will run from 7<sup>th</sup> August 2024 until 27<sup>th</sup> November 2024.

### 3.2 Consultation methods

The documents will be published on the council's website and made available at the council's Tooley Street offices. An advert publicising the SPD consultation will be put in Southwark News and an email notification will be sent to around 30,000 contacts who have signed up for the Planning Policy mailing list.

The two tables below set out the statutory minimum requirements to meet Government regulations and the further additional consultation methods we intend to do. We include dates when we have meetings confirmed. We also set out the key consultee groups that the consultation method is aimed at.

Table 1: Statutory consultation

<b>METHOD OF CONSULTATION</b>	<b>CONSULTEE</b>	<b>DATE</b>	<b>COMMENTS</b>
Place the SPD on the council's website.	All	Consultation launch	Our website will continually be updated.
A hard copy of the SPD will be made available at 160 Tooley Street (the Council's offices)	All	Consultation launch	
Press notice in local newspaper advertising the beginning of the consultation.	All	Consultation launch	This will be in the Southwark News.

Email out to all statutory consultees on planning policy database	All on planning policy consultee database	Consultation launch	
Make a copy of the SPD available for an individual if requested	Individuals if requested	On request	

Table 2: Additional consultation

<b>METHOD OF CONSULTATION</b>	<b>CONSULTEE</b>	<b>DATE</b>	<b>COMMENTS</b>
Email out to all non-statutory consultees on planning policy mailing list. This will set out the timescale for consultation and how people can comment.	All on planning policy mailing list	Consultation launch	An email will be sent to the 30,000+ contacts who have signed up for the Planning Policy mailing list, as well as the groups identified in our SCI.
Officers will attend community meetings, where requested	All who attend the community meetings	Throughout consultation	
Presentation at Southwark Youth parliament	Youth parliament members	Throughout consultation	
Presentation of the SPD to Planning committee	Planning committee	Throughout consultation	
Email notifications to tenants and residents associations	TRA members	Throughout consultation	
Updates on the council's Twitter page	Twitter followers	Throughout consultation	
Place posters in all Southwark libraries. Assistance is available in libraries to those who need help making a comment on an SPD online.	Library users	Consultation launch	

## 4. How to comment

We welcome your comments on the draft SPD once public consultation has launched on 7<sup>th</sup> August 2024.

Please contact us if you want to know more about the documents or about our consultation.

All comments must be received by the consultation close date of 27<sup>th</sup> November 2024. Comments received after this date will not be considered.

Representations can be made by:

- Visiting our consultation website and submitting our online questionnaire. This will be made available once public consultation has launched.
- Sending an email to [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk)
- Alternatively, you can send your response to:

Planning Policy  
160 Tooley Street  
London  
SE1 2QH



## 5. What happens next?

This is the stage of consultation for the Affordable Housing SPD. Next steps for the policy document are set out below.

After consulting on this first draft of the SPD, we will collate all the feedback we receive and publish a final version of the plan for formal consultation. This will then be considered by Cabinet prior to adoption.

Table 3: Timeline of SPD

Stage of consultation	Consultation timescale
Public consultation of the draft SPD begins	7 <sup>th</sup> August 2024
Public consultation of the draft SPD concludes	27 <sup>th</sup> November 2024
Consideration of consultation responses	December 2024 / January 2025
Adoption of the SPD	May 2025



# **Equality Impact and Needs Analysis**

**Affordable Housing Supplementary Planning  
Document (SPD)**

**Section 1: Equality impact and needs analysis details**


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<b>Proposed policy/decision/business plan to which this equality analysis relates</b>		Affordable Housing Supplementary Planning Document			
<b>Equality analysis author</b>		Eden Hall and Nicolette Harriott			
<b>Strategic Director:</b>		Clive Palfreyman			
<b>Department</b>		Planning Policy	<b>Division</b>	Planning and Growth	
<b>Period analysis undertaken</b>		June 2024			
<b>Date of review (if applicable)</b>		June 2025			
<b>Sign-off</b>		<b>Position</b>		<b>Date</b>	

## Section 2: Brief description of policy/decision/business plan

---

### 1.1 Brief description of policy/decision/business plan

The purpose of the SPD is to set out the council's approach to delivering affordable housing. This is a key objective of the Southwark Plan 2022, outlined in strategic policy SP1 'Homes for all'.

The guidance in this SPD is relevant to all housing development (including new build, change of use, conversions and extensions) with a policy requirement for affordable housing. It provides detailed guidance about how decisions on planning applications will be made.

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- Set out the expectations for the design and management of affordable housing
- Set out monitoring arrangements to retain affordable housing

**Section 3: Overview of service users and key stakeholders consulted**

<b>2. Service users and stakeholders</b>	
<b>Key users of the department or service</b>	<p>Externally, the key users of the SPD will be Southwark developers and individuals applying for planning permission. Other users may include registered providers, planning agents, architects or those employed to make manage development in the borough.</p> <p>Internally, the SPD will be used by planning officers to assess planning applications.</p>
<b>Key stakeholders were/are involved in this policy/decision/business plan</b>	<p>The SPD was prepared and developed by the planning division, with input from planning policy and development management officers as well as other Council departments.</p> <p>The SPD has been reviewed by the Cabinet member for New Homes and Sustainable Development and will be taken to the Council's Cabinet on the 18th July 2024 to agree the SPD for public consultation.</p> <p>Members of the public will be able to give comments on the SPD at the consultation stage.</p>

## Section 4: Pre-implementation equality impact and needs analysis

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This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio-economic issues (levels of poverty, employment, income). As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantage.

Socio-economic disadvantage may arise from a range of factors, including:

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantage

**The public sector equality duty (PSED)** requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of under-represented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future For All values: that we will

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

<p><b>Age</b> - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential Socio-Economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Affordable housing delivery</u></p> <p>This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council considers to be genuinely affordable and meet the needs of residents including for social rented and intermediate homes.</p> <p>Guidance is also provided on the expectation of affordable housing delivery from major development. This sets out how major development should deliver affordable housing onsite for unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu.</p> <p>The SPD further sets out the expectation of affordable housing delivery for non-conventional housing such as Purpose-built student accommodation (PBSA) and Houses in Multiple Occupation (HMOs).</p> <p>This will benefit residents of all ages in the borough as the guidance generally promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.</p>	<p>The guidance in this SPD will have beneficial socio-economic impacts on residents of all ages in the borough as it supports the provision of affordable housing and in particular social rented homes.</p> <p>Affordable housing in general provides for residents of various socio-economic needs and stages of life, contributing to more balanced and mixed communities.</p> <p>Social rented homes are vital to social regeneration as it allows residents who cannot afford market housing to remain close to their families, friends and employment.</p> <p><i>Young adults and children</i></p> <p>This guidance may be of particular benefit to young adults as they are less likely to own their home than other age groups.</p> <p>This guidance may also be of particular benefit to children who live in disadvantaged or overcrowded homes. The child poverty rate in Southwark is higher than that of London as a whole. Child poverty rates are particularly high in Opportunity Areas, where development is likely to be concentrated. Children in overcrowded homes also often achieve poorly at school and suffer disturbed sleep.</p>

	<p>The guidance supports the provision of affordable housing in the borough which can help young adults and families who cannot afford market cost to enter the housing market or secure stable rental options.</p>
<p><u>Assessing viability during the determination of planning applications and in viability reviews</u></p> <p>This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of review mechanisms (such as early, mid-stage or late-stage reviews).</p> <p>This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development.</p> <p>This will benefit residents of all ages in the borough as it will allow for a continued provision of affordable homes or financial contributions towards affordable housing delivery.</p>	<p>This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on residents of all ages in the borough as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.</p>
<p><u>Expectations for design and management of affordable housing</u></p> <p>This SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable to those who occupy them. This includes ways of using design and management to minimise future repair costs and recommendations to keep service charges affordable.</p> <p>This will benefit residents of all ages in the borough.</p>	<p>This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on residents of all ages in the borough.</p>



<p><u>Monitoring requirements to retain affordable housing</u></p> <p>This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring Schedule (AHMS) and annual audit which developers must complete.</p> <p>This guidance will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements.</p> <p>This will benefit residents of all ages as it will help the retention of affordable housing in the borough.</p>	<p>This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on residents of all ages in the borough.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-Economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>The median age in Southwark is 33, which is below that of London as a whole (35). (Source: <a href="#">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p> <p>Southwark has an ageing population. Between 2011 and 2021, the proportion of Southwark residents aged 0-9 fell from 12.6% to 10.5%, while the proportion aged 50 and over rose from 20.4% to 24.7%. (Source: <a href="#">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p> <p>A 79% increase in the population of Southwark aged 65 or more is forecast by 2039. This incorporates a 92% increase in those over 75 and 87% growth in those over 85. (Source: Strategic Housing Market Assessment Update 2019 (Source: <a href="#">Housing - Southwark Council</a>)).</p>	<p>In 2021/22 approximately 23,000 children aged 0-15 in Southwark were living in poverty, after housing costs were factored in, equating to 36% of children in the borough. This is higher than the London average of 33%. (Source: <a href="#">JSNA Annual Report - Southwark Council</a>).</p> <p>Council wards with the highest proportions of child poverty (22-28%) include Old Kent Road, Faraday, North Walworth, Chaucer, and Borough and Bankside. Faraday ranks as the most deprived ward in Southwark. These areas overlap with the Old Kent Road, Elephant and Castle, and London Bridge/Bankside Opportunity Areas. (JSNA Annual Report 2023; JSNA Multiward Profiles 2023: West Central Southwark)</p>

<p><u>Home or freehold ownership</u></p> <p>In 2019, only 5% of households in London headed by someone aged 16-24 owned their own home. By contrast, home ownership rates for householders headed by someone aged 45+ are over 50%. (<a href="#">Housing in London 2020</a>).</p> <p>Leasehold households generally have younger household reference persons (HRPs) than non-leasehold households. In the England Housing Survey 2021-2022, there was a significantly higher proportion of 25–34-year-olds in leasehold households in the owner-occupied sector (14%) than in non-leasehold households overall (8%). (<a href="#">English Housing Survey 2021 to 2022: leasehold households - GOV.UK (www.gov.uk)</a>).</p>	<p>Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (Source: GLA - <a href="#">Housing in London 2020</a>).</p>
<p><u>Housing need</u></p> <p>In Southwark, 4.3% of young people aged 24 and under are living in social rented housing (<a href="#">Southwark Key Housing Stats 2020</a>)</p>	<p>As identified in the Strategic Housing Market Assessment (SHMA) approximately 78% of our total affordable housing need is for intermediate housing to meet the housing needs of lower- and middle-income residents. However, the most acute need is for social rented housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions. (<a href="#">Southwark Council, Strategic Market Housing Assessment, 2019</a>)</p>
<b>Mitigating and/or improvement actions to be taken</b>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

**Disability** - 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.

Please note that under the PSED due regard includes:

Giving due consideration in all relevant areas to “the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.”

This also includes the need to understand and focus on different needs/impacts arising from different disabilities.

<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from disadvantage (positive and negative)</b></p>
<p><u>Affordable housing delivery</u></p> <p>This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council considers to be genuinely affordable and meet the needs of residents including for social rented and intermediate homes.</p> <p>Guidance is also provided on the expectation of affordable housing delivery from major development. This sets out how major development should deliver affordable housing onsite for unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu.</p> <p>This will benefit all residents in the borough, including those who are disabled. This is because the guidance promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.</p>	<p>This guidance may be of particular benefit to disabled people as they are less likely than non-disabled people to own their own home.</p> <p>The guidance supports the provision of affordable housing in the borough which can help disabled residents who cannot afford market cost to enter the housing market or secure stable rental options.</p>

<p><u>Assessing viability during the determination of planning applications and in viability reviews</u></p> <p>This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of review mechanisms (such as early, mid-stage or late-stage reviews).</p> <p>This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development.</p> <p>This will benefit all residents in the borough, including those who are disabled. This is because it will allow for a continued provision of affordable homes or financial contributions towards affordable housing delivery.</p>	<p>This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including those who are disabled, as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.</p>
<p><u>Expectations for design and management of affordable housing</u></p> <p>This SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable to those who occupy them. This includes ways of using design and management to minimise future repair costs and recommendations to keep service charges affordable.</p> <p>This will benefit all residents in the borough, including those who are disabled.</p>	<p>This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including those who are disabled.</p>
<p><u>Monitoring requirements to retain affordable housing</u></p> <p>This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring</p>	<p>This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in</p>

<p>Schedule (AHMS) and annual audit which developers must complete.</p> <p>This guidance will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements.</p> <p>This will benefit all residents in the borough, including those who are disabled. This is because it will help the retention of affordable housing in the borough.</p>	<p>the borough, including those who are disabled.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General</u></p> <p>In 2021, 8.2% of Southwark residents identified as being disabled and limited a lot. This was a decrease from 11.1% in 2011. Almost a quarter of households (33,000) had at least one resident with a disability. (Source: <a href="#">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p> <p>The neighbourhoods with higher proportions of disability are Old Kent Road, South Bermondsey and Nunhead &amp; Queen's Road. (Source: Census 2021, quoted in <a href="#">JSNA Annual Report - Southwark Council</a>).</p>	<p>The Joseph Rowntree Foundation has found that poverty rates for households with a disabled person or informal carer are much higher than average. (<a href="#">UK Poverty 2023: The essential guide to understanding poverty in the UK   Joseph Rowntree Foundation (jrf.org.uk)</a>).</p>
<p><u>Home ownership</u></p> <p>According to the ONS, in 2021 40% of disabled people in the UK owned their own home, compared to 53% of non-disabled people (<a href="#">Outcomes for disabled people in the UK - Office for National Statistics (ons.gov.uk)</a>).</p>	<p>Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (<a href="#">Housing in London 2020</a>).</p>

<p><u>Housing need</u></p> <p>In 2019 there were 613 households in Southwark with unmet wheelchair accessible accommodation needs. (<a href="#">Southwark Council, Strategic Market Housing Assessment, 2019</a>)</p>	<p>In the 3 years to 2021/22, 33% of families in London that included a disabled person were in poverty compared to 22% of those without a disabled household member. (Source: <a href="#">Nearly half of everyone in poverty is either a disabled person or lives with a disabled person   Disability Rights UK</a>).</p>
<b>Mitigating and/or improvement actions to be taken</b>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.</p>

<p><b>Gender reassignment:</b> - The process of transitioning from one gender to another.</p> <p><b>Gender Identity:</b> Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Affordable housing delivery</u> This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council considers to be genuinely affordable and meet the needs of residents including for social rented and intermediate homes.</p> <p>Guidance is also provided on the expectation of affordable housing delivery from major development. This</p>	<p>This guidance may be of particular benefit to transgender people as they are less likely than cis-gender people to own their own home.</p> <p>The guidance supports the provision of affordable housing in the borough which can help transgender residents who cannot afford market cost to enter the housing market or secure stable rental options.</p>

<p>sets out how major development should deliver affordable housing onsite for unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu.</p> <p>This will benefit all residents in the borough, including those of all gender identities. This is because the guidance promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.</p>	
<p><u>Assessing viability during the determination of planning applications and in viability reviews</u></p> <p>This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of review mechanisms (such as early, mid-stage or late-stage reviews).</p> <p>This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development.</p> <p>This will benefit all residents in the borough, including those of all gender identities. This is because it will allow for a continued provision of affordable homes or financial contributions towards affordable housing delivery.</p>	<p>This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including those of all gender identities, as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.</p>
<p><u>Expectations for design and management of affordable housing</u></p> <p>This SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable to those who occupy them. This includes ways of using design and</p>	<p>This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite.</p>

<p>management to minimise future repair costs and recommendations to keep service charges affordable.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>This will have beneficial socio-economic impacts on all residents in the borough, including those of all gender identities.</p>
<p><u>Monitoring requirements to retain affordable housing</u></p> <p>This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring Schedule (AHMS) and annual audit which developers must complete.</p> <p>This guidance will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements.</p> <p>This will benefit all residents in the borough, including those of all gender identities. This is because it will help the retention of affordable housing in the borough.</p>	<p>This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including those of all gender identities.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>1.23% of people aged 16 years and over in Southwark have a gender identity different from their sex registered at birth. (Census 2021)</p> <p>8.1% of people in the Burgess Park area have reported a gender identity different from their sex registered at</p>	<p>No positive or negative socio-economic impact applicable.</p>



<p>birth. This is the highest figure of any area (medium super output area) in England and Wales. (Census 2021)</p>	
<p><u>Home ownership</u></p> <p>In the last census, 31% of cisgender Southwark residents responded that they lived in a home that is owned by themselves or someone they live with (either outright, or with a mortgage, loan or shared ownership). By contrast, only 13.3% of trans women and 16.7% of trans men in Southwark selected one of these housing tenures. (Source: <a href="#">Gender identity by tenure - Office for National Statistics (ons.gov.uk)</a>).</p>	<p>Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (<a href="#">Housing in London 2020</a>).</p>
<p><u>Housing need</u></p> <p>A survey by the Albert Kennedy Trust (a charity dedicated to supporting LGBTQ+ homeless young people) found that 77 per cent of young LGBTQ+ people surveyed consider their sexual or gender identity as the main cause of rejection from home (9 LGBT Youth Homelessness: A UK National Scoping Of Cause, Prevalence, Response, And Outcome, Albert Kennedy Trust. (<a href="https://www.akt.org.uk/research">https://www.akt.org.uk/research</a>))</p>	<p>One in four trans people have experienced homelessness at some point in their lives. (Stonewall, 'LGBT in Britain: Trans Report 2018 (available at: <a href="https://www.stonewall.org.uk/system/files/lgbt_in_britain_trans_report_final.pdf">https://www.stonewall.org.uk/system/files/lgbt_in_britain_trans_report_final.pdf</a>)</p>
<b>Mitigating and/or improvement actions to be taken</b>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.</p>

<p><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 couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favorably than married couples and must be treated the same as married couples on a wide range of legal matters. <b>(Only to be considered in respect to the need to eliminate discrimination.)</b></p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Affordable housing delivery</u></p> <p>This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council considers to be genuinely affordable and meet the needs of residents including for social rented and intermediate homes.</p> <p>Guidance is also provided on the expectation of affordable housing delivery from major development. This sets out how major development should deliver affordable housing onsite for unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses. This is because the guidance promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.</p>	<p>The guidance in this SPD will have beneficial socio-economic impacts on all residents, including those of all marriage statuses, as it supports the provision of affordable housing, as stated opposite.</p>

<p><u>Assessing viability during the determination of planning applications and in viability reviews</u></p> <p>This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of review mechanisms (such as early, mid-stage or late-stage reviews).</p> <p>This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development.</p> <p>This will benefit all residents in the borough including those of all marriage statuses. This is because it will allow for a continued provision of affordable homes or financial contributions towards affordable housing delivery.</p>	<p>This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including those of all marriage statuses, as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.</p>
<p><u>Expectations for design and management of affordable housing</u></p> <p>This SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable to those who occupy them. This includes ways of using design and management to minimise future repair costs and recommendations to keep service charges affordable.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses.</p>	<p>This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including those of all marriage statuses.</p>
<p><u>Monitoring requirements to retain affordable housing</u></p> <p>This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring</p>	<p>This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in</p>

<p>Schedule (AHMS) and annual audit which developers must complete.</p> <p>This guidance will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses. This is because it will help the retention of affordable housing in the borough.</p>	<p>the borough, including those of all marriage statuses.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>The latest census found that 26.9% of Southwark residents were married or in a civil partnership. This was a fall from 29.4% in 2011. Southwark had the fourth-highest percentage of adults who had never been married or in a civil partnership of all English local authorities. The proportion of residents who are married or in a civil partnership is significantly higher in the south of the borough than the north. (Source: <a href="https://ons.gov.uk">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Mitigating or improvement actions to be taken</b></p>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.</p>

<p><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.</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Affordable housing delivery</u></p> <p>This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council considers to be genuinely affordable and meet the needs of residents including for social rented and intermediate homes.</p> <p>Guidance is also provided on the expectation of affordable housing delivery from major development. This sets out how major development should deliver affordable housing onsite for unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity. This is because the guidance promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.</p>	<p>The guidance in this SPD will have beneficial socio-economic impacts on all residents, including those who are pregnant or in maternity, as it supports the provision of affordable housing, as stated opposite.</p>
<p><u>Assessing viability during the determination of planning applications and in viability reviews</u></p> <p>This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of review</p>	<p>This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite.</p>

<p>mechanisms (such as early, mid-stage or late-stage reviews).</p> <p>This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity. This is because it will allow for a continued provision of affordable homes or financial contributions towards affordable housing delivery.</p>	<p>This will have beneficial socio-economic impacts on all residents in the borough, including those who are pregnant or in maternity, as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.</p>
<p><u>Expectations for design and management of affordable housing</u></p> <p>This SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable to those who occupy them. This includes ways of using design and management to minimise future repair costs and recommendations to keep service charges affordable.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity.</p>	<p>This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including those who are pregnant or in maternity.</p>
<p><u>Monitoring requirements to retain affordable housing</u></p> <p>This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring Schedule (AHMS) and annual audit which developers must complete.</p> <p>This guidance will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements.</p>	<p>This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including those who are pregnant or in maternity.</p>

<p>This will benefit all residents in the borough, including those who are pregnant or in maternity. This is because it will help the retention of affordable housing in the borough.</p>	
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>The total number of babies born in Southwark has been decreasing year on year over the past 10 years. The decline in the fertility rate in Southwark is seen across all age groups, but particularly among younger women. The average age of mothers giving birth in Southwark in 2022 was around 33 years. (<a href="#">JSNA Annual Report - Southwark Council</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

<p><b>Race</b> - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Affordable housing delivery</u></p> <p>This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council</p>	<p>The guidance in this SPD will have beneficial socio-economic impacts on all residents, including those of all ethnicities, as it supports the provision</p>

<p>considers to be genuinely affordable and meet the needs of residents including for social rented and intermediate homes.</p> <p>Guidance is also provided on the expectation of affordable housing delivery from major development. This sets out how major development should deliver affordable housing onsite for unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu.</p> <p>This will benefit all residents in the borough, including those of all ethnicities. This is because the guidance promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.</p>	<p>of affordable housing, as stated opposite.</p> <p>The guidance may be of particular benefit to residents of certain ethnicities who are less likely to own their own home or live with overcrowding.</p> <p>Home ownership varies greatly between ethnic minorities and is below average for most. Overcrowding levels also vary greatly between ethnic minorities and is above average for most. Black, Black British, Black Welsh, Caribbean or African households have the highest level of overcrowding.</p> <p>The guidance supports the provision of affordable housing in the borough which can help those residents who cannot afford market cost to enter the housing market or secure stable rental options.</p>
<p><u>Assessing viability during the determination of planning applications and in viability reviews</u></p> <p>This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of review mechanisms (such as early, mid-stage or late-stage reviews).</p> <p>This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development.</p> <p>This will benefit all residents in the borough, including those of all ethnicities. This is because it will allow for a continued provision of affordable homes or financial contributions towards affordable housing delivery.</p>	<p>This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including those of all ethnicities, as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.</p>



<p><u>Expectations for design and management of affordable housing</u></p> <p>This SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable to those who occupy them. This includes ways of using design and management to minimise future repair costs and recommendations to keep service charges affordable.</p> <p>This will benefit all residents in the borough, including those of all ethnicities.</p>	<p>This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including those of all ethnicities.</p>
<p><u>Monitoring requirements to retain affordable housing</u></p> <p>This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring Schedule (AHMS) and annual audit which developers must complete.</p> <p>This guidance will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements.</p> <p>This will benefit all residents in the borough, including those of all ethnicities. This is because it will help the retention of affordable housing in the borough.</p>	<p>This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including those of all ethnicities.</p>
<p><u>Language</u></p> <p>Those who speak English as a second language may find it challenging to understand the guidance provided in the SPD. This means the guidance in the SPD could be less of a benefit to those residents who speak English as a second language.</p>	<p>No positive or negative socio-economic impact applicable.</p>

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<p><u>General data</u></p> <p>Southwark is a very ethnically diverse borough. In 2021, 51.4% of residents identified as white (a decrease from 54.2% in 2011). 25.1% identified as 'Black, Black British, Black Welsh, Caribbean or African'. 9.9% identified as 'Asian, Asian British or Asian Welsh'. 6.3% identified as 'Arab of any other ethnic group'. (Source: <a href="#">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>)</p> <p>Areas (medium super output areas) in Southwark with the highest proportions of Black residents include Peckham Park Road (48.8%), Burgess Park (38.7%) and South Bermondsey West (31.7%). In addition, the area with the highest proportion of residents identifying as 'other ethnic group' is Burgess Park (15.6%). These areas overlap with the Old Kent Road Opportunity Area. The Areas with the highest proportions of Asian residents are Elephant and Castle (21%) and Borough and Southwark Street (19%). These areas overlap with the Elephant and Castle and London Bridge/Bankside Opportunity Areas. (Source: <a href="#">Ethnic group - Census Maps, ONS</a>).</p>	<p>29% of Black residents live in the borough's most deprived neighbourhoods, while only 17% of the borough's white residents live in these neighbourhoods. (<a href="#">JSNA Annual Report - Southwark Council</a>).</p> <p>Data shows that ethnic minority residents are more likely to experience deprivation and disadvantage. For example, 72% of Southwark households consisting of only Black residents experience disadvantage, compared with 45% of households consisting solely of White residents. Similarly, there are clear differences in health outcomes between ethnic groups. (Source: <a href="#">JSNA Annual Report - Southwark Council</a>).</p> <p>Within Southwark, the areas with the highest levels of deprivation are largely in the centre of the borough. Council wards with the highest levels of deprivation include St George's, North Walworth, and Faraday. (Source: <a href="#">JSNA Annual Report - Southwark Council</a>). These areas are also home to large Black, Asian, and 'other ethnicity' communities. (Source: <a href="#">Ethnic group - Census Maps, ONS</a>).</p>
<p><u>Home ownership</u></p> <p>The English Housing Survey 2017-2018 found that 68% of White British households owned their own home (outright or with a mortgage). The level of home ownership is lower among all other ethnic groups except Indian and Mixed White/Asian. The level of home ownership is lowest among Black African and Arab households (20% and 17% respectively). (<a href="#">Home ownership - GOV.UK Ethnicity facts and figures (ethnicity-facts-figures.service.gov.uk)</a>).</p>	<p>Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (<a href="#">Housing in London 2020</a>).</p>

<p><u>Housing need</u></p> <p>The 2021 census found that 2.5% of households in England where all residents identified as white were overcrowded. This is lower than any other ethnic group or combination of groups. Households where all members identified as “Black, Black British, Black Welsh, Caribbean or African” had the highest level of overcrowding (16.1% in England). (<a href="#">Overcrowding and under-occupancy by household characteristics, England and Wales - Office for National Statistics (ons.gov.uk)</a>).</p> <p>ONS data for England in 2018 shows that the proportion of households with four or more individuals is 35% for White households, but much higher for many other types of households, including 51% of Black households and 82% of Pakistani or Bangladeshi households. (<a href="#">Estimated number of people in households by households size and ethnicity, England, 2018 - Office for National Statistics (ons.gov.uk)</a>).</p>	<p>In the 2021 Census, a larger proportion of people in England and Wales identified as homeless identified within the "Black, Black British, Black Welsh, Caribbean or African" (15.0%), "Mixed or Multiple ethnic groups" (5.1%), or "Other ethnic group" (6.1%) high-level categories, when compared with the rest of the population of England and Wales (4.0%, 2.9%, and 2.1%, respectively). (<a href="#">People experiencing homelessness, England and Wales - Office for National Statistics (ons.gov.uk)</a>)</p>
<p><u>Languages</u></p> <p>244,000 (79%) Southwark residents reported their main language to be English. This is comparable to London, where 76% of residents recorded English as their main language, but lower than across England (88% of the population).</p> <p>Spanish is the most common main language other than English, spoken by 13,000 Southwark residents. ‘All other Chinese’ is the most common Asian language, while Somali is the most spoken African language of Southwark residents.</p> <p>Of the 53,700 Southwark residents whose main language is not English, 10,200 (19%) cannot speak English well or have no English proficiency. (Source: <a href="#">Southwark Demographics - Southwark Council</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>

<b>Mitigating and/or improvement actions to be taken</b>	
<p>Those who speak English as a second language may find it challenging to understand the guidance provided in the SPD. This means the guidance in the SPD could be less of a benefit to those residents who speak English as a second language.</p> <p>Of the 53,700 Southwark residents whose main language is not English, 10,200 (19%) cannot speak English well or have no English proficiency.</p> <p>To mitigate this, the Council can translate the SPD into different languages upon request. The SPD has further adhered to Hemingway Plain English guidelines to ensure the text is as accessible as practical.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.</p>

<b>Religion and belief - 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>	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b>	<b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b>
<p><u>Affordable housing delivery</u></p> <p>This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council considers to be genuinely affordable and meet the needs of residents including for social rented and intermediate homes.</p> <p>Guidance is also provided on the expectation of affordable housing</p>	<p>The guidance in this SPD will have beneficial socio-economic impacts on all residents, including those of all religious and belief groups, as it supports the provision of affordable housing, as stated opposite.</p> <p>The guidance may be of particular benefit to residents of certain religious and belief groups who are less likely to own their own home or live with overcrowding.</p>

<p>delivery from major development. This sets out how major development should deliver affordable housing onsite for unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups. This is because the guidance promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.</p>	<p>Home ownership varies greatly between religious and belief groups. The level of home ownership is below average among Muslims, Buddhists, and non-religious people. Overcrowding levels also vary greatly between religious and belief groups. Muslim households have the highest level of overcrowding. Overcrowding is also higher than average among Hindu, Sikh, and Buddhist households.</p> <p>The guidance supports the provision of affordable housing in the borough which can help those residents who cannot afford market cost to enter the housing market or secure stable rental options.</p>
<p><u>Assessing viability during the determination of planning applications and in viability reviews</u></p> <p>This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of review mechanisms (such as early, mid-stage or late-stage reviews).</p> <p>This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups. This is because it will allow for a continued provision of affordable homes or financial contributions towards affordable housing delivery.</p>	<p>This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including those of all religious and belief groups, as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.</p>

<p><u>Expectations for design and management of affordable housing</u></p> <p>This SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable to those who occupy them. This includes ways of using design and management to minimise future repair costs and recommendations to keep service charges affordable.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups.</p>	<p>This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including those of all religious and belief groups.</p>
<p><u>Monitoring requirements to retain affordable housing</u></p> <p>This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring Schedule (AHMS) and annual audit which developers must complete.</p> <p>This guidance will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups. This is because it will help the retention of affordable housing in the borough.</p>	<p>This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including those of all religious and belief groups.</p>

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<p><u>General data</u></p> <p>The latest census found that 43.3% of Southwark residents identify as Christian and 9.6% identify as Muslim. 1.1% identify as Hindu, 1% identify as Buddhist, and 0.2% identify as Sikh. 36.4% identify as having no religion. (<a href="#">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p>	<p>No negative socio-economic impact applicable.</p>
<p><u>Home ownership</u></p> <p>The 2021 Census found that 63% of people in England and Wales lived in households that owned their own accommodation (outright, with a mortgage, or shared ownership). Only 46% of Muslim people and 57% of Buddhist people lived in a household that owned their own accommodation. For people of no religion the figure is 59%. The figure is higher than average for people who are Sikh, Jewish, Christian or Hindu. (<a href="#">Religion by housing, health, employment, and education, England and Wales - Office for National Statistics (ons.gov.uk)</a>).</p>	<p>Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (<a href="#">Housing in London 2020</a>).</p>
<p><u>Housing need</u></p> <p>The 2021 Census found that 4.4% of all households in England were overcrowded. The rate of overcrowding among Muslim households was 22.5%. The rate of overcrowding was also higher than average among Hindu, Sikh, and Buddhist households. (<a href="#">Overcrowding and under-occupancy by household characteristics, England and Wales - Office for National Statistics (ons.gov.uk)</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>

<b>Mitigating and/or improvement actions to be taken</b>	
As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.	As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.

<b>Sex - A man or a woman.</b>	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b>	<b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b>
<p><u>Affordable housing delivery</u></p> <p>This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council considers to be genuinely affordable and meet the needs of residents including for social rented and intermediate homes.</p> <p>Guidance is also provided on the expectation of affordable housing delivery from major development. This sets out how major development should deliver affordable housing onsite for unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu.</p> <p>This will benefit all residents in the borough, including both men and women. This is because the guidance promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.</p>	<p>The guidance in this SPD will have beneficial socio-economic impacts on all residents, including both men and women, as it supports the provision of affordable housing, as stated opposite.</p>



<p><u>Assessing viability during the determination of planning applications and in viability reviews</u></p> <p>This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of review mechanisms (such as early, mid-stage or late-stage reviews).</p> <p>This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development.</p> <p>This will benefit all residents in the borough, including both men and women. This is because it will allow for a continued provision of affordable homes or financial contributions towards affordable housing delivery.</p>	<p>This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including both men and women, as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.</p>
<p><u>Expectations for design and management of affordable housing</u></p> <p>This SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable to those who occupy them. This includes ways of using design and management to minimise future repair costs and recommendations to keep service charges affordable.</p> <p>This will benefit all residents in the borough, including both men and women.</p>	<p>This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including both men and women.</p>
<p><u>Monitoring requirements to retain affordable housing</u></p> <p>This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring Schedule (AHMS) and annual audit which developers must complete.</p>	<p>This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including both men and women.</p>

<p>This guidance will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements.</p> <p>This will benefit all residents in the borough, including both men and women. This is because it will help the retention of affordable housing in the borough.</p>	
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>The Census 2021 found that 51.6% of Southwark's residents are women and 48.4% are men. (Census 2021)</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Housing need</u></p> <p>In the 2021 Census, of all people identified as homeless in England and Wales, around two-thirds were male and one-third were female (67.1% males compared with 32.9% females). (<a href="#">People experiencing homelessness, England and Wales - Office for National Statistics (ons.gov.uk)</a>).</p> <p>In 2022/23, 86% of rough sleepers in Southwark were male. (<a href="#">Public Pack Appendices – Part 1 Agenda Supplement for Cabinet, 06?03?2024 11:00</a>)</p>	<p>The GLA reports that women earning the women's median wage need to spend 63% of their earnings to afford the median private rent in London. Men only need to spend 49% of their earnings on average. (London Assembly, 'Women and housing: a gap in the market', 2023 (<a href="#">Gender pay gap continues to impact women in housing   London City Hall</a>))</p>
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.</p>

<p><b>Sexual orientation</b> - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Affordable housing delivery</u></p> <p>This SPD provides clear guidance on the council's approach to delivering affordable housing. This includes definitions of the housing options which the council considers to be genuinely affordable and meet the needs of residents including for social rented and intermediate homes.</p> <p>Guidance is also provided on the expectation of affordable housing delivery from major development. This sets out how major development should deliver affordable housing onsite for unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The expectation is also set out for securing affordable housing contributions from small sites through payment in lieu.</p> <p>This will benefit all residents in the borough, including all sexual orientations. This is because the guidance promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.</p>	<p>The guidance in this SPD will have beneficial socio-economic impacts on all residents, including all sexual orientations, as it supports the provision of affordable housing, as stated opposite.</p>
<p><u>Assessing viability during the determination of planning applications and in viability reviews</u></p> <p>This SPD provides guidance on the Council's approach to viability testing and reviews. This includes the different routes available, expectations of financial viability assessments and the use of review mechanisms (such as early, mid-stage or late-stage reviews).</p>	<p>This guidance will help secure the maximum affordable housing contribution from developments, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the</p>

<p>This guidance will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development.</p> <p>This will benefit all residents in the borough, including all sexual orientations. This is because it will allow for a continued provision of affordable homes or financial contributions towards affordable housing delivery.</p>	<p>borough, including all sexual orientations, as it can help those who cannot afford market cost to enter the housing market or secure stable rental options.</p>
<p><u>Expectations for design and management of affordable housing</u></p> <p>This SPD promotes good design and management of affordable housing as a means of ensuring the homes remain affordable to those who occupy them. This includes ways of using design and management to minimise future repair costs and recommendations to keep service charges affordable.</p> <p>This will benefit all residents in the borough, including all sexual orientations.</p>	<p>This SPD provides guidance on ensuring affordable homes are also affordable once occupied, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including all sexual orientations.</p>
<p><u>Monitoring requirements to retain affordable housing</u></p> <p>This SPD provides guidance on the monitoring the council undertakes to ensure that the correct provision of affordable housing has been delivered and is being retained appropriately. This includes setting out the requirements for developers to comply with and providing guidance on the mandatory Affordable Housing Monitoring Schedule (AHMS) and annual audit which developers must complete.</p> <p>This guidance will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements.</p>	<p>This SPD will support the council in monitoring affordable housing delivery and retention, as stated opposite.</p> <p>This will have beneficial socio-economic impacts on all residents in the borough, including all sexual orientations.</p>

<p>This will benefit all residents in the borough, including all sexual orientations. This is because it will help the retention of affordable housing in the borough.</p>	
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General</u></p> <p>In the latest census 8.08% of Southwark's residents identified as LGBTQ+. This is the fourth highest figure of any local authority district in England and Wales. The areas with the highest proportion of LGBT+ residents are in the north-west of the borough. (<a href="#">Census 2021</a>)</p>	<p>No negative socio-economic impact applicable.</p>
<p><u>Home ownership</u></p> <p>In the last census, 30.2% of heterosexual Southwark residents responded that they lived in a home that is owned by themselves or someone they live with (either outright, or with a mortgage, loan or shared ownership). For lesbian and gay people, this figure was 45.4%, but for bisexual people it was only 24.4%. For people who selected the 'all other sexual orientations' option, the figure was 16.7%. (Source: <a href="#">Office for National Statistics (ons.gov.uk)</a>)</p>	<p>Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (<a href="#">Housing in London 2020</a>).</p>
<p><u>Housing need</u></p> <p>One in six LGB people have experienced homelessness at some point in their lives. (<a href="#">Stonewall and Yougov, 'LGBT in Britain: Home and Communities', 2018</a>)</p>	<p>With one in four (24%) of homeless people under 25 are thought to be LGBTQ+. (World Habitat Report - Left out: Why many LGBTQ+ people aren't accessing their right to housing in the UK (<a href="https://www.housinglin.org.uk/assets/Resources/Housing/OtherOrganisation/Left-out-Why-many-LGBTQ-people-arent-accessing-their-right-to-housing-in-the-UK.pdf">https://www.housinglin.org.uk/assets/Resources/Housing/OtherOrganisation/Left-out-Why-many-LGBTQ-people-arent-accessing-their-right-to-housing-in-the-UK.pdf</a>)</p>

<b>Mitigating and/or improvement actions to be taken</b>	
As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.	As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against unforeseen issues that arise.

<b>Human Rights</b>
There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>
<p>The SPD offers guidance on applying vital policies outlined in the Southwark Plan 2022 and does not create any new policy. It aims to offer clearer direction on implementing, delivering and monitoring affordable housing within Southwark, along with precise definitions of what qualifies as affordable housing in the borough.</p> <p>This protects local identity and improves public realm considerate of the Human Rights Act.</p>
<b>Information on which above analysis is based</b>
All data illustrated in Southwark Plan Integrated Impact Assessment (February 2022) for Strategic Policy 1 Homes for All, Strategic Policy 2 Southwark Together and Strategic Policy 5 Thriving neighbourhoods and tackling health inequalities. The SPD provides guidance and contributes to IIA01 'To tackle poverty and encourage wealth creation', 'IIAO5 'To promote social inclusion, equality, diversity and community cohesion', IIAO15 'To provide everyone with the opportunity to live in a decent home'.
<b>Mitigating and/or improvement actions to be taken</b>
As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on human rights. The Council will mitigate against any unforeseen issues that arise.

## **Conclusions**

Overall, the SPD will have no negative impacts on the equalities of residents in Southwark. There are many benefits of the SPD for all residents in the borough, including all protected characteristics.

The SPD provides clear guidance on the council's approach to delivering affordable housing. Guidance is also provided on the expectation of affordable housing delivery from major development. The SPD further sets out the expectation of affordable housing delivery for non-conventional housing such as Purpose-built student accommodation (PBSA) and Houses in Multiple Occupation (HMOs). This will benefit residents of all protected characteristics in the borough as the guidance generally promotes the onsite provision of genuinely affordable housing and will ensure a wide range of homes are delivered to meet different needs.

The SPD will support the council and case officers in securing the maximum affordable housing contribution possible at various stages of development. This will benefit residents of all protected characteristics in the borough as it will allow for a continued provision of affordable homes and financial contributions towards affordable housing delivery.

The SPD promotes good design and management of affordable housing which will benefit future residents of all protected characteristics in the borough as it ensures the homes remain affordable to those who occupy them.

The SPD will support the council in monitoring the provision of affordable housing and enforcing against developers who breach legal agreements. This will benefit residents of all protected characteristics as it will help the retention of affordable housing in the borough.

Those who speak English as a second language may find it challenging to understand the guidance provided in the SPD. This means the guidance in the SPD could be less of a benefit to those residents who speak English as a second language. Mitigation measures to address this concern have been set out in section 5.

The Council will continue to monitor impacts on all protected characteristics and will mitigate against any unforeseen issues that arise.

## Section 5: Further equality actions and objectives

<b>5. Further actions</b>			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
<b>Number</b>	<b>Description of issue</b>	<b>Action</b>	<b>Timeframe</b>
1	Ensure that the Affordable Housing SPD is adopted within the shortest timeframe possible by the Council so that the benefits identified can be secured.	Progress the Affordable Housing SPD towards public consultation and then formal adoption at Cabinet.	Public consultation proposed to be agreed at Cabinet on 22 <sup>nd</sup> July 2024.
2	Ensure that the implementation of the Affordable Housing SPD is monitored following adoption for potential actual effects on different groups.	The outcomes of implementing the guidance in the SPD will be monitored through the Authority Monitoring Report (AMR). Equality analysis is an ongoing process and that does not end once the SPD is implemented.	Monitoring will be undertaken annually.
3	Ensure that there is no language barrier preventing residents from accessing the SPD.	Upon request the Council can translate the documents into other languages.	Upon request.





# **Strategic Environmental Assessment (SEA)**

**Affordable Housing Supplementary Planning  
Document (SPD)**

## 1. Introduction

This is a Strategic Environmental Assessment screening document for Affordable Housing Supplementary Planning Document. It determines that a Strategic Environmental Assessment is not required in this case for the reasons outlined in the remainder of this report.

## 2. Legislative Background

A Strategic Environmental Assessment (SEA) is a way of ensuring the environmental implications of a plan or programme for ‘town or country planning or ‘land use’ are taken into account. The need for environmental assessments is set out in the EU Directive 2001/42/EC (hereafter referred to as the SEA Directive). This has subsequently been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (hereafter referred to as the SEA Regulations).

The Government’s Planning Practice Guidance (PPG) published in September 2023 states that in some limited circumstances, where a Supplementary Planning Document (SPD) could have significant environmental effects, it may fall within the scope of the SEA Regulations and would require an SEA. To determine whether the Affordable Housing SPD could have significant environmental effects, its potential scope has been assessed against the criteria set out in to the SEA Regulations OBJ noted in the PPG, an SEA is unlikely to be required where an SPD deals only with a small area at a local level (see regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004). However, an SEA is required if there are likely to be significant environmental effects OBJ OBJ OBJ.

## 3. Screening Process

The screening opinion assessment is undertaken in two parts: the first part will assess whether the SPD requires SEA (as per the flow chart shown in Figure 1); and the second part of the assessment will consider whether the SPD is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the SEA Directive and the SEA Regulations.

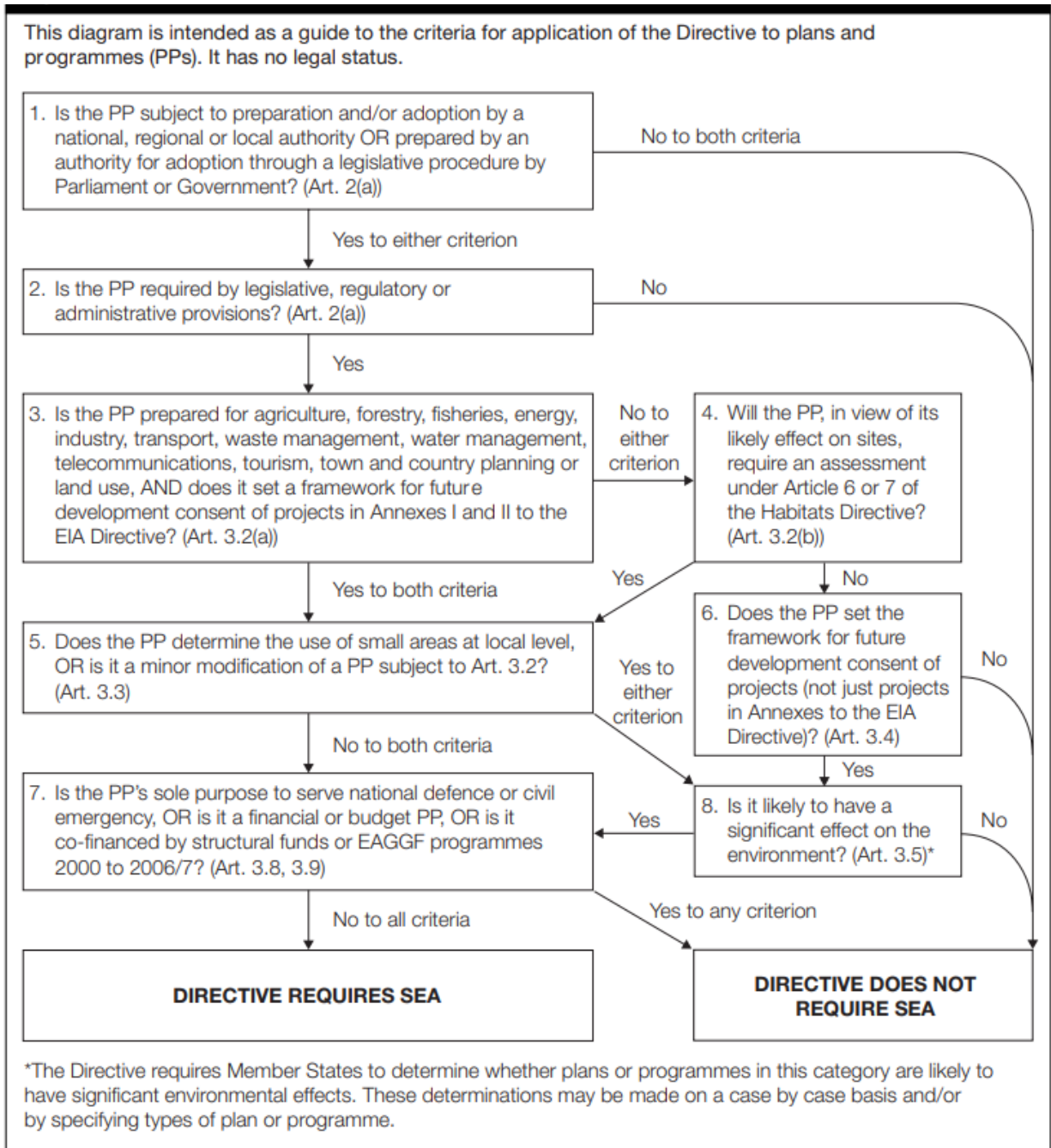


Figure 1: Application of the SEA Directive to plans and programmes

#### 4. Summary of the SPD

<b>Details of SPD</b>	
<b>Name of SPD</b>	Affordable Housing Supplementary Planning Document (SPD)
<b>Geographic Coverage</b>	The entire borough
<b>Purpose</b>	<p>The purpose of the SPD is to set out the council's approach to delivering affordable housing. This is a key objective of the Southwark Plan 2022, outlined in strategic policy SP1 'Homes for all'.</p> <p>The guidance in this SPD is relevant to all housing development (including new build, change of use, conversions and extensions) with a policy requirement for affordable housing. It provides detailed guidance about how decisions on planning applications will be made.</p> <p>This SPD provides further guidance for applying the policies in the Southwark Plan 2022. It does not contain new policy. The SPD will be a material consideration in determining a planning application.</p>

<b>Summary of content</b>	<p>The SPD has the following objectives:</p> <ul style="list-style-type: none"><li>• Support the implementation of Southwark Plan 2022 strategic policy SP1 ‘Homes for all’</li><li>• Provide clear definitions of what is considered affordable housing</li><li>• Set out the hierarchy for the delivery of affordable housing, including for small sites and non-conventional housing</li><li>• Set out the Council’s approach to assessing viability during the determination of planning application and in viability reviews</li><li>• Set out the standards for the housing mix and tenure of affordable housing</li><li>• Set out the expectations for the design and management of affordable housing</li><li>• Set out monitoring arrangements to retain affordable housing</li></ul>
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## 5. Assessment 1: Screening Assessment Establishing the Need for SEA Stage

Stage	Y/N	Reason
Is the SPD subject to preparation and/or adoption by a national, regional or local authority, OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	Yes.  The SPD will be prepared and adopted by Southwark Council in its role as Local Planning Authority, which is allowed under the Town and Country Planning Act 1990.
Is the SPD required by legislative, regulatory or administrative provisions? (Art. 2(a))	N	No.  The preparation of this SPD is not a requirement of legislation, regulatory or administrative provisions.
Is the SPD prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art. 3.2(a))	Y	Yes.  The SPD is intended to provide further guidance to the adopted Southwark Plan 2022 which is the land-use planning policy framework for its area. This has been subject to full Sustainability Appraisal (including SEA). The SPD will not create new policy or land-use designations.
Will the SPD, in view of its likely effect on site, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))	N	No.  The HRA of the Southwark Plan 2022 has been undertaken alongside the IIA, with the findings of the HRA informing the IIA. The methods and findings of the HRA process are reported separately from the IIA and the report has been approved by the statutory consultee (Natural England) and placed online to be accessed by the wider public.

		<p>The HRA screening process has found that the policies and site allocations to be adopted under the Southwark Plan 2022 will have no negative impact on the four European Sites that are located within a 10km boundary of Southwark, either alone or when considered in combination with other existing plans and projects. In light of this finding, it is not required to carry out any further HRA analysis.</p> <p>The SPD will not change or add to policy, proposals or designations within the Local Plan, therefore it is not considered that further screening for such assessment is necessary as there would be no significant effects on European Sites.</p>
<p>Does the SPD determine the use of small areas at local level OR is it a minor modification of a plan or programme subject to Art. 3.2? (Art. 3.3)</p>	<p>N</p>	<p>No.</p> <p>There are no additional policies, proposals or allocations contained within the SPD which have not already been set within the Local Plan. There will be no aspect of the SPD which would modify the emerging Local Plan, just support it.</p>
<p>Does the SPD set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art. 3.4)</p>	<p>N</p>	<p>No.</p> <p>This framework is already set within the Local Plan. The SPD will provide further guidance on the relevant policies, proposals or allocations within the Local Plan.</p>

Is the SPD's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan or programme, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art. 3.8, 3.9)	N/A	Not applicable.
Is it likely to have a significant effect on the environment? (Art 3.5)	N	<p>No.</p> <p>It is not likely that the SPD will have any significant effect that has not already been identified and assessed through the Sustainability Appraisal (including SEA) of the adopted Southwark Plan.</p> <p>It will provide guidance on the existing policy within the Southwark Plan.</p>

## 6. Assessment 2: Likely Significant Effects on the Environment

<b>SEA Directive criteria and Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004</b>	<b>Southwark Council assessment</b>	<b>Likely significant environmental effect?</b>
The characteristics of plans and programmes, having regard, in particular, to-		



<p>The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;</p>	<p>The SPD will provide further guidance on the policies, proposals and the relevant site allocations that are contained within the Local Plan.</p> <p>The Local Plan as a whole, including those parts relating to the area and the topics covered in this SPD, have been fully assessed for the purposes of Sustainability Appraisal and the Strategic Environmental Assessment, with no additional environmental impact for consideration</p>	<p><b>None</b></p>
<p>The degree to which the plan or programme influences other plans and programmes, including those in a hierarchy</p>	<p>The SPD, in providing further guidance on the framework set within the Local Plan, does not directly affect other specific public sector plans or programmes but rather is influenced by the Local Plan and other higher tier planning policy including the London Plan, which has also been subject to a SA/SEA and examined against the National Planning Policy Framework.</p>	<p><b>None</b></p>
<p>The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development;</p>	<p>The Local Plan sets the context for achieving sustainable development, for which the SPD will provide further guidance regarding how this should be achieved.</p> <p>The guidance in the SPD is being used to promote sustainable development and environmental considerations.</p>	<p><b>Yes</b></p>
<p>Environmental problems relevant to the plan or programme; and</p>	<p>Environmental problems have already been considered in the Sustainability Appraisal associated with the Local Plan, which the guidance in this document supplements.</p>	<p><b>None</b></p>

	No additional issues should arise, as the SPD does not create policies or site allocations.	
The relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The SPD is not directly relevant to the implementation of any National or European legislation on the environment, such as the Water Framework Directive.	<b>None</b>

<b>Characteristics of the effects and of the area likely to be affected, having particular regard to:</b>		
The probability, duration, frequency and reversibility of the effects;	<p>This SPD seeks to ensure that development across the Local Plan period makes appropriate contributions to the supporting infrastructure required to sustain the projected level of development.</p> <p>It is not anticipated the SPD will result in significant long-term adverse effects, and any social and environmental impacts are likely to be positive.</p>	<b>None</b>
The cumulative nature of the effects;	The SPD is in general conformity with the strategic policies, the implementation of which it seeks to support across the Borough. It is not considered that there will be any negative cumulative effects on the	<b>None</b>

	Borough overall.	
The transboundary nature of the effects;	The HRA screening process found that the policies and site allocations to be adopted under the Southwark Plan 2022 will have no negative impact on the four European Sites that are located within a 10km boundary of Southwark, either alone or when considered in combination with other existing plans and projects. In light of this finding, it is not required to carry out any further HRA analysis.	<b>None</b>
The risks to human health or the environment (for example, due to accidents);	The SA and SEA conducted for the Local Plan did not identify any potential negative impacts upon human health and the environment.	<b>None</b>
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	<p>This is not an area-specific policy, but supplementary planning guidance which will apply to development across the borough. As such, it should not in itself directly result in any spatial impacts of any notable magnitude.</p> <p>The geographical area of the borough has been subject to an SA / SEA through the development of the Local Plan.</p>	<b>None</b>

**The value and vulnerability of the area likely to be affected due to—**

(i) special natural characteristics or cultural heritage;	Applications for development within the borough will be assessed against relevant development policy in relation to sites of importance for cultural heritage. Southwark Council's designated heritage assets are covered by separate Local Plan and legislation. The SPD seeks a positive approach to seeking to maintain or improve the setting of these assets. No significant effects have therefore been identified.	<b>None</b>
(ii) exceeded environmental quality standards or limit values; or	The SPD seeks to support development in keeping with the principles outlined in national, London Plan and Local Plan policy guidance and the policies in the Local Plan have already been subject to SA/SEA to ensure development is sustainable.	<b>None</b>
(iii) intensive land-use.		<b>None</b>
<b>Assessment 2 conclusion:</b>	<b>The draft Affordable Housing SPD is not likely to have a significant detrimental impact upon the environment.</b>	

## 7. Conclusion: Summary of Screening Opinion

As a result of the Screening Assessment, it is concluded that Affordable Housing Supplementary Planning Document (SPD) is not likely to have significant environmental effects.

The Affordable Housing SPD conforms with the adopted Southwark Plan 2022 and corresponding Site Specific Allocations. The SPD provides guidance on these policies but does not create new policy. The policies and allocations therein have been subject to Strategic Environmental Assessment in their own right through the Southwark Plan 2022 Integrated Impact Assessment.

<b>Meeting Name:</b>	Cabinet
<b>Date:</b>	22 July 2024
<b>Report title:</b>	Householder Development Supplementary Planning Document
<b>Cabinet Member:</b>	Councillor Helen Dennis, New Homes and Sustainable Development
<b>Ward(s) or groups affected:</b>	All
<b>Classification:</b>	Open
<b>Reason for lateness (if applicable):</b>	N/a

**FOREWORD - COUNCILLOR HELEN DENNIS, CABINET MEMBER FOR NEW HOMES AND SUSTAINABLE DEVELOPMENT**

Over recent years, we have focused in on how to make the planning system more accessible for our residents. The creation of the planning register has made it much easier to search for applications and find associated documents, whilst our digital tools now mean it is much easier to find the policies that apply in each particular circumstance.

With this Householder SPD, we have brought together all of the policies and guidance that might apply to those seeking amendment or extension of their home, into a format which we hope makes things easier to search and understand. This includes information about our climate & environment policies insofar as they apply to existing dwellings and it is our hope through this guidance to encourage homes of the highest design and environmental standards across Southwark.

**RECOMMENDATIONS**

**Recommendation(s) for the Cabinet**

1. To agree the Householder Development Supplementary Planning Document (SPD) for public consultation.
2. To note the consultation plan and supporting documentation.

**Recommendation(s) for the Leader of the Council**

3. Not applicable.

## REASONS FOR RECOMMENDATIONS

- Regulation 12 (1) of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires a Local Authority to publicly consult on an SPD before it can be adopted.

## ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

- No alternative option has been considered as the proposed recommendation is a statutory requirement.

## POST DECISION IMPLEMENTATION

- Public consultation on the Householder Development SPD.
- In accordance with Southwark's statement of community involvement (SCI), the draft SPD will be available for comment for a minimum of twelve weeks. Additional time will also be added to the consultation to account for the summer period. Full details of the public consultation can be found in Appendix 2: Consultation plan.
- The consultation will run from 7 August 2024 until 27 November 2024.
- Once the public consultation is complete, the SPD will then be prepared for adoption. Officers will review the public consultation responses and make any amendments to the SPD where necessary.
- The recommendation to adopt the SPD will be brought before Cabinet in May 2025.

Key Activity	Target completion date
Public consultation of the Affordable Housing SPD begins	7 August 2024
Public consultation of the Affordable Housing SPD concludes	27 November 2024
Amendments to Householder Development SPD (where necessary) following public consultation responses	December 2024 / January 2025
Adoption of Householder Development SPD by Cabinet	May 2025

## BACKGROUND INFORMATION

- The Householder Development SPD will mostly replace the 2015 Technical Update to the Residential Design Standards (2011) relating to householders.

12. Summary of key changes from the 2015 Technical Update to the Residential Design Standards (2011):
  - This SPD reflects updates to the General Permitted Development Order (GPDO) since 2010
  - This SPD includes guidance on development types which were not covered by the 2015 Technical Update such as roof terraces
  - This SPD provides guidance on current Council priority areas such as green energy enhancements.
  - This SPD does not include guidance which is now covered by the Southwark Plan 2022.
13. Guidance which has not been included as part of the SPD or Southwark Plan will be retained in a saved version of the 2015 Technical Update to the Residential Design Standards (2011). This is very limited, as most guidance has been included elsewhere. This will allow officers to continue to reference the saved guidance in the determination of planning applications. This is an interim measure and will be resolved by future planning policy work.
14. Beyond this, it is likely that separate guidance will be necessary on the wider range of housing developments included in the Southwark Plan 2022 including design standards for Student Housing, Hotels and Apart-hotels, Co-living etc. A programme for this separate guidance will be circulated separately.

### **KEY ISSUES FOR CONSIDERATION**

15. A large proportion of development in Southwark affects existing homes with residents seeking to make changes that suit their changing circumstances.
16. The Householder Development SPD seeks to clarify this approach, helping to prioritise adaptations and provide guidance on suitable and beneficial changes that residents can consider.
17. The guidance in the SPD is relevant to all residents and those who own or manage a home in the borough. This includes guidance for houses and flats as well as homes which are listed buildings or within conservation areas. The SPD is not relevant to the creation of new dwellings.
18. It is designed for a wide readership, including applicants, owners, residents, planners, community groups and developers.
19. The SPD has the following objectives:
  - To guide the improvement and adaptation of existing homes

- To ensure a high standard of housing for all, ensuring homes are enjoyable, liveable and accessible.
  - To encourage the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.
  - To ensure works to existing homes mitigate impact on the amenity, privacy and appearance of the surrounding area and neighbours.
  - To encourage sustainable technologies, healthy communities and to preserve Southwark's rich heritage.
20. The SPD covers a broad range of works which can be considered when looking to improve or extend a home. This includes:
- Improving the appearance of a home
  - Improving the thermal performance or energy efficiency of a home
  - How to find the most appropriate type of extension for a home
  - Whether planning permission or listed building consent is required
  - If any specialist information is required to support a planning application.

### **Policy framework implications**

21. The Householder Development SPD provides guidance on how to apply the relevant policies of the Southwark Plan 2022. It gives guidance on how to conform to the additional national and local legislature and policies within which the council must operate.
22. The SPD will be a material consideration in the determination of a planning application.
23. The SPD principally provides further information on the following Southwark Plan policies:
- P13 Design of places
  - P14 Design quality
  - P15 Residential
  - P16 Designing out crime
  - P18 Efficient use of land
  - P19 Listed buildings and structures
  - P20 Conservation areas



- P21 Conservation of the historic environment and natural heritage
- P26 Local list
- P56 Protection of amenity
- P59 Green infrastructure
- P60 Biodiversity
- P61 Trees
- P62 Reducing waste
- P66 Reducing noise pollution and enhancing soundscapes
- P68 Reducing food risk.

### **Community, equalities (including socio-economic) and health impacts**

24. Section 149 of the Equality Act 2010 sets out the Public Sector Equality Duty (PSED). This requires public bodies to consider all individuals when carrying out their day-to-day work – in shaping policy, in delivering services and in relation to their own employees.
25. It requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people when carrying out their activities.
26. The council's [Approach to Equality](#) commits the council to ensuring that equality is an integral part of our day-to-day business. The [Equality Framework for Local Government](#) exists to help organisations, review and improve their performance for people with characteristics protected by the Equality Act 2010.
27. The Equalities Impacts and Needs Analysis (EINA) concluded that the Householder Development SPD would have no negative impacts on equalities in Southwark. The SPD does not create new policies but provides guidance on how existing policies should be implemented.
28. The EINA found that the SPD would benefit some groups more than others, as the guidance provided is simpler to implement if in home ownership.
29. The SPD will however have broad benefits for all borough residents. These include protection of built heritage and townscape, protection of neighbourhood amenity and climate change mitigation.
30. The SPD can also be of particular benefit to many protected groups who are more likely to experience fuel poverty or overcrowding and those groups who need to extend or alter their home.
31. There are no mitigating or improvement actions to be taken as a result of the EINA.

32. The full analysis can be found in Appendix 3: Equalities Impact and Needs Analysis.

### **Climate change implications**

33. The Council has declared a Climate Emergency with the ambition to reach carbon neutrality by 2030.
34. Plan-making will contribute to this ambition through the preparation and implementation of planning policies, specifically in the development management process. Planning applications will be required to meet the policy requirements set out in the Southwark Plan 2022 and any supplementary planning documents.
35. This is supported by Southwark's Climate Change Strategy and Climate Change Resilience and Adaptation Strategy which sets out Action Points to meet this target.
36. The Householder Development SPD encourages the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.

### **Resource implications**

37. There are no additional resource implications arising from the Householder Development SPD.
38. Staffing and any other resources connected to the SPD are to be contained within existing departmental capacity.

### **Legal implications**

39. This report is being brought before the Cabinet under Part 3C of the Constitution. Paragraph 21 of the constitution states that the Cabinet has the power to adopt supplementary planning documents.
40. The Cabinet therefore has the power to agree the draft of the Householder Development SPD, which would include sending it out for consultation.
41. The Town and Country Planning (Local Planning) England Regulations 2012 states at regulation 12 that a local planning authority must undertake a process of public participation before it can adopt an SPD. Part of that process involves consulting with relevant persons, setting out the main issues raised by those persons and then explaining how those issues have been addressed in the SPD. This report is the first step towards beginning the public participation process and will help to inform the final draft of the SPD.
42. SPDs are not subject to independent examination in the same way that other planning documents are. However, as stated above there is still a process of consultation that must be undertaken in respect of such documents. Section 19(3) of the Planning and Compulsory Purchase Act 2004 specifically requires local planning authorities to comply with their adopted Statement of Community

Involvement (“SCI”).

### **Financial implications**

43. There are no immediate financial implications arising from the Householder Development SPD.
44. Staffing and any other costs connected to the SPD are to be contained within existing departmental revenue budgets.

### **Consultation**

45. Public consultation would commence if the recommendation proposed in this report is agreed.
46. In accordance with Southwark’s statement of community involvement (SCI), the draft SPD will be available for comment for a minimum of twelve weeks. Additional time will also be added to the consultation to account for the summer period.
47. The consultation will run from 7 August 2024 until 27 November 2024.
48. The consultation will be run on the consultation platform, Citizen Lab. Comments will also be accepted by email or post.
49. The full details of the public consultation are set out in Appendix 2: Consultation plan.

### **Strategic Environmental Assessment (SEA)**

50. A Strategic Environmental Assessment (SEA) is a way of ensuring the environmental implications of a plan or programme for ‘town or country planning or ‘land use’ are taken into account. The need for environmental assessments is set out in the EU Directive 2001/42/EC. This has subsequently been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004.
51. A screening assessment has been undertaken to determine whether the Householder Development SPD requires a SEA. This is in accordance with Government’s Planning Practice Guidance (PPG) published in September 2023.
52. The screening assessment concluded that the Householder Development SPD is not likely to have significant environmental effects and as such, does not require a SEA.
53. The Householder Development SPD conforms with the adopted Southwark Plan 2022 and corresponding Site-Specific Allocations. The SPD provides guidance on these policies but does not create new policies. The policies and allocations therein have been subject to an SEA through the Southwark Plan 2022 Integrated Impact Assessment.

54. The full assessment can be found in Appendix 4: Strategic Environmental Assessment Screening (SEA).

## **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

### **Assistant Chief Executive, Governance and Assurance – NST050724**

55. Under paragraph 7 of Part 3D Individual Cabinet Members have the power to agree significant policy issues in relation to their area of responsibility. The Cabinet Member for New Homes and Sustainable Development therefore has the power to agree the draft Householder Development SPD which would include approving a draft for consultation. However, given the significance of the Householder Development SPD, the draft is brought to Cabinet for approval.
56. Final approval of the SPD resides with full Cabinet under Part 3C of the Constitution paragraph 21 which states that only full Cabinet has the power to adopt supplementary planning documents taking account of comments from the planning committee.
57. Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in the adopted Southwark Plan 2022. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making.
58. The National Planning Policy Framework states that SPDs add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites or on particular issues and are capable of being a material consideration in planning decisions but are not part of the development plan.
59. Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing Supplementary Planning Documents. The Householder Development SPD will not form part of the statutory development plan but will be an important material consideration in determining planning applications.
60. The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) also require the Council to consider whether or not Strategic Environmental Assessment (SEA) of the SPD should be undertaken. A strategic environmental assessment is unlikely to be required where a supplementary planning document deals only with a small area at a local level (see regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004), unless it is considered that there are likely to be significant environmental effects.
61. Before deciding whether significant environment effects are likely, the criteria specified in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004 need to be taken into account. Officers have

considered this at paragraphs 48-52 and prepared a screening report (Appendix 4). They consider that it is unlikely that there are significant environmental effects.

62. Council Assembly on 14 July 2021 approved a change to the council's Constitution to confirm that all decisions made by the council will consider the climate and equality (including socio-economic disadvantage and health inequality) consequences of taking that decision. This has been considered at paragraphs 23-31 above.
63. The Public Sector Equality Duty ("PSED") is set out at section 149 of Equality Act 2010 and requires the council to have due regard in the exercise of its functions (including decision making), to the need to:
64.
  - Eliminate discrimination, harassment, victimisation or other prohibited conduct;
  - Advance of equality of opportunity between persons who share a relevant protected characteristics and those who do not share it;
  - Foster good relations between those who share a relevant characteristic and those that do not share it.
65. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
66. Officers have considered the council's PSED under section 149 of the 2010 Act at paragraphs 23-31 of this report and the Equalities and Impact Needs Analysis (EINA) at Appendix 3. Officers have concluded that, at this stage, the draft Householder Development SPD is not considered to have any adverse impacts on persons with protected characteristics.
67. The report recommends that the draft Householder Development SPD is published for public consultation. Comments relating to equalities considerations will be considered following the consultation and Householder Development SPD updated as appropriate.
68. Section 19(3) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to comply with their adopted Statement of Community Involvement (SCI). The Council's SCI provides for a period of 6 weeks informal consultation followed by 6 weeks formal consultation.

#### **Strategic Director, Finance (FC24/002)**

69. The report requests approval from Cabinet to agree the Householder Development Supplementary Planning Document (SPD) for public consultation and to note the consultation plan and supporting documentation.
70. The strategic director of finance notes that there will be no immediate financial implications associated with the implementation of this SPD and notes other comments in the financial implications.

71. Staffing and any other costs associated with this recommendation are to be contained within existing departmental revenue budgets.

### REASONS FOR URGENCY

72. Not applicable.

### REASONS FOR LATENESS

73. Not applicable.

### BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
The Southwark Plan 2022	Planning Policy 160 Tooley Street London SE1P 5LX  Online <a href="#">here</a>	Planning Policy team <a href="mailto:planningpolicy@southwark.gov.uk">planningpolicy@southwark.gov.uk</a>
2015 Technical Update to the Residential Design Standards (2011)	Planning Policy 160 Tooley Street London SE1P 5LX  Online <a href="#">here</a>	Planning Policy team <a href="mailto:planningpolicy@southwark.gov.uk">planningpolicy@southwark.gov.uk</a>

### APPENDICES

No.	Title
Appendix 1	Householder Development Supplementary Planning Document
Appendix 2	Consultation Plan
Appendix 3	Equalities Impacts and Needs Analysis (EINA)
Appendix 4	Strategic Environmental Assessment Screening (SEA)

**AUDIT TRAIL**

<b>Cabinet Member</b>	Councillor Helen Dennis, New Homes and Sustainable Development	
<b>Lead Officer</b>	Gemma Williams, Team leader	
<b>Report Author</b>	Marco Chan, Graduate planner	
<b>Version</b>	Final	
<b>Dated</b>	9 July 2024	
<b>Key Decision?</b>	Yes	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments Included</b>
Assistant Chief Executive, Governance and Assurance	Yes	Yes
Strategic Director, Finance	Yes	Yes
<b>Cabinet Member</b>	Yes	Yes
<b>Date final report sent to Constitutional Team</b>		9 July 2024

**DRAFT**

**HOUSEHOLDER  
DEVELOPMENT**

**SUPPLEMENTARY  
PLANNING DOCUMENT (SPD)**



# FOREWORD

Over recent years, we have focused in on how to make the planning system more accessible for our residents. The creation of the planning register has made it much easier to search for applications and find associated documents, whilst our digital tools now mean it is much easier to find the policies that apply in each particular circumstance.

With this Householder SPD, we have brought together all of the policies and guidance that might apply to those seeking amendment or extension of their home, into a format which we hope makes things easier to search and understand. This includes information about our climate & environment policies insofar as they apply to existing dwellings and it is our hope through this guidance to encourage homes of the highest design and environmental standards across Southwark.



**Councillor Helen Dennis**

Cabinet Member for New Homes and Sustainable Development  
Southwark Council

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# CHAPTER 1

# INTRODUCTION

# 1 INTRODUCTION

This section provides an overview of the Householder Supplementary Planning Document (SPD). It sets out how this guidance should be used and who should be using it. It provides a policy overview and sets out the key things to consider when planning works to existing homes in Southwark.

## 1.1 Overview

The purpose of this supplementary planning document (SPD) is to set out the standard of design expected from the development of existing homes in Southwark.

The SPD has the following objectives:

- To guide the improvement and adaptation of existing homes
- To ensure a high standard of housing for all, ensuring homes are enjoyable, liveable and accessible.
- To encourage the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.
- To ensure works to existing homes mitigate impact on the amenity, privacy and appearance of the surrounding area and neighbours.
- To encourage sustainable technologies, healthy communities and to preserve Southwark's rich heritage.

## 1.2 What development does it apply to?

The guidance in this SPD is relevant to all existing homes, whether a house or a flat. The SPD also covers homes which are Listed Buildings or within Conservation Areas. It does not apply to the creation of new homes.

The guidance covers a broad range of works you can consider when looking to improve or extend your home. This includes:

- Improving the appearance of your home
- Improving the thermal performance or energy efficiency of your home
- How to find the most appropriate type of extension for your home
- Whether planning permission or Listed Building Consent is required
- If any specialist information is required to support your planning application

Summary tables have been included at the start of each section to help you quickly see if you need planning permission or Listed Building Consent. Detailed guidance is then provided where relevant.

### Is permission required for insulation?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
A planning application is not required unless the external appearance of a building is changed.	A planning application is not required unless the external appearance of a building is changed.	A planning application is required for external but not internal insulation.	Listed Building Consent and a planning application are required.

Table 1: Example of a summary table

**You must seek your own independent advice before proceeding with any development proposals to ensure it complies with all relevant legal requirements.**

## 1.3 Policy context

This SPD provides guidance for applying the policies in the Southwark Plan 2022. It does not contain new policy. The SPD will be a material consideration in the determination of a planning application.

The Southwark Plan 2022 is the development plan for Southwark. It is in conformity with the broader guidelines and policies set out in the London Plan 2021 and the National Planning Policy Framework (NPPF) 2023.

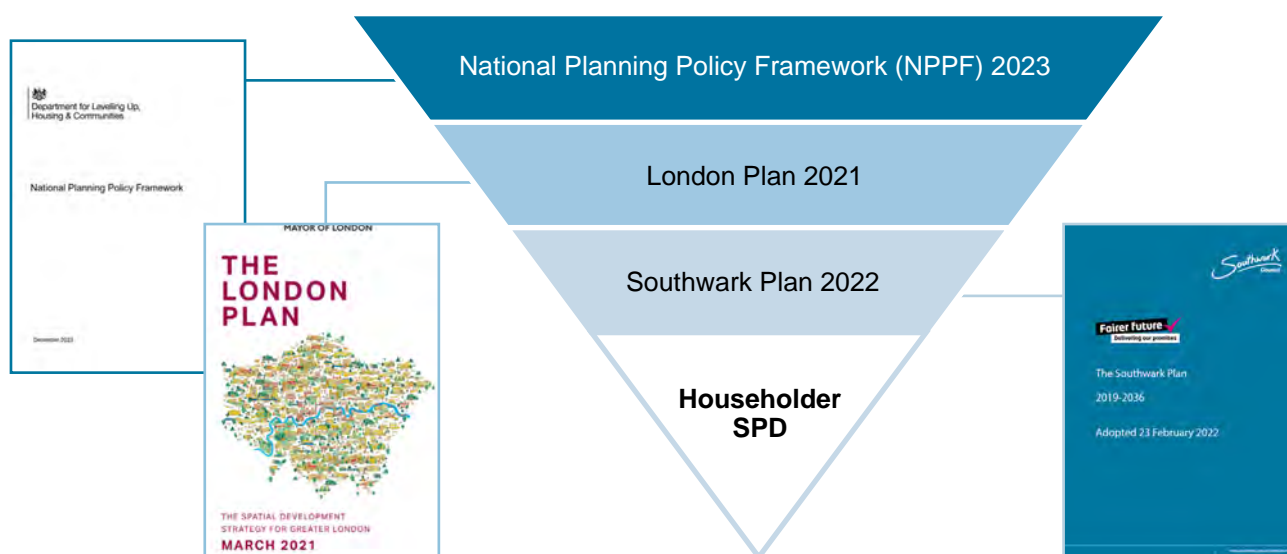


Figure 1: Policy context

### 1.3.1 National policy

#### *Permitted development*

You can carry out certain improvements and extensions without submitting a planning application. This is where planning permission for certain works is already granted by national legislation. This is known as permitted development. These regulations are set out in the General Permitted Development Order 2015 (GDPO).

For example, you may be able to add a large single storey extension to your home under permitted development. This is subject to limitations by the GDPO and only applicable to homes outside of Conservation Areas. You will also need to apply for 'Prior Approval' for these large rear extensions. The council will consult adjacent neighbours to ensure that their amenity would not be harmed by the proposals.

Permitted development does not apply to flats or maisonettes. If you live in a flat (including a house converted into flats) or a maisonette, then you will need to apply for planning permission for external changes.

Permitted development is restricted in Conservation Areas and other areas where the council has issued an Article 4 Direction. These are used to control small-scale changes which may erode the character of an area over time. This could be through the loss or alteration of windows, doors, roofs or front gardens. More information about Article 4 Directions can be found here. You can also check if there are any Article 4 Directions on your property using [Southwark Maps](#).

### 1.3.2 Local policy

#### *Southwark Plan 2022*

The Southwark Plan 2022 contains multiple relevant policies, for which this SPD provides further guidance:

- Policy P13 (design of places) sets out numerous design principles including that development must “ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context; and better reveal local distinctiveness and architectural character; and conserve and enhance the significance of the local historic environment”.
- Policy P14 (Design Quality) establishes further principles relating to daylight and sunlight, outlook, response to context, sustainable design, inclusive design, and basements.
- Policy P15 (Residential Design) states that “development must achieve an exemplary standard of residential design”.
- Policy P56 (Protection of Amenity) states that “development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users”.
- Policy P69 (Sustainability Standards) states that “development must: reduce the risk of overheating, taking into account climate change predictions over the lifetime of the in accordance with prioritised measures set out in the following cooling hierarchy.”
- Policy P70 (Energy) states that ‘Development must minimise carbon emissions on site in accordance with the following energy hierarchy: 1. Be lean (energy efficient design and construction); then 2. Be clean (low carbon energy supply); then 3. Be green (on site renewable energy generation and storage).’

In addition, other policies relating to conservation and heritage, environmental protection, designing out crime, and archaeology may be of relevance.

## 1.4 Key considerations

There are many factors which you need to consider before planning works to your home. These are detailed in the relevant sections of the SPD as well as summarised below.

### 1.4.1 Improving energy and thermal performance

Improving the energy and thermal performance of a home is a key objective for many residents. It aligns with the Southwark Climate Change Strategy which sets out the steps the borough needs to take to be carbon neutral by 2030.

Improving energy and thermal performance can also help to reduce carbon emissions and make your home more resilient to the effects of a changing climate.

#### *Free pre-application advice service*

The council offers a free planning advice service for the following works:

- Solar panels
- Heat pump
- External insulation

This is so we can support our residents' transition to low and zero carbon solutions for heating, powering and insulating their homes. This can contribute to reducing energy demand and energy bills.

This service is available to all homeowners, including owners of flats. You can use this service to discuss the proposed works with a planning officer. This can help to resolve any design issues before submitting a planning application.

#### *Reducing carbon emissions*

It is important to consider how you can reduce your carbon emissions when planning works for your home. The energy hierarchy on the next page sets out an order of priority for considering carbon reductions. This is underpinned by Southwark Plan (2022) Policy P70 (Energy).



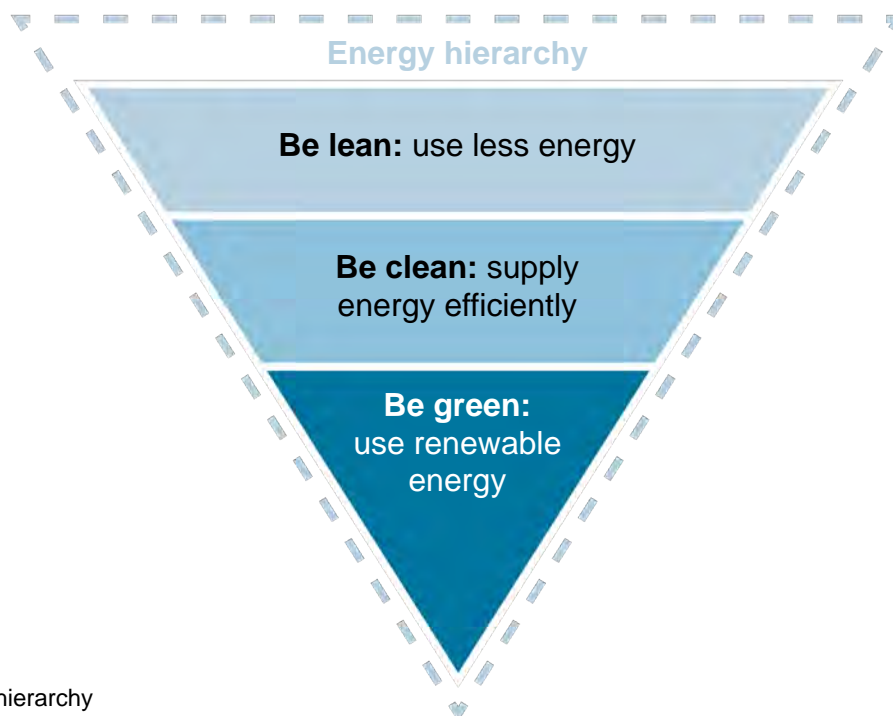


Figure 2: Energy hierarchy

'Be lean' savings should be prioritised and made by using energy efficient design and construction. This encourages a consideration of carbon reduction at the start of a design process. The lifespan of materials used in the works should be considered as well as the potential for natural cooling or heating. This may also include the use of draught proofing or insulation to improve the thermal performance of your home.

The 'be clean' stage encourages the use of a low carbon energy supply such as a heat pump. The 'be green' stage encourages the use of on-site energy production, such as solar panels.

As best practice, the use of low carbon, recycled and re-used materials, as well as recycling any materials removed from the site is encouraged.

### *Whole Building Approach*

We encourage a '[Whole Building Approach](#)' when planning works to your home. This involves considering your whole home when trying to improve energy and thermal performance.

A home performs best when many (or all) parts are functioning, rather than one element. You should consider how different factors such as ventilation, heating and insulation interrelate. This can help to regulate the temperature in your home and make it more resilient to the effects of a changing climate.

The phasing of works needs to be planned to avoid creating other issues such as damp or poor ventilation. This involves the timing of which building element to refurbish – when, how and in which order. You should also check your home for draughts. For example, the use of insulation will not be as effective if your home is draughty.

A Whole Building Approach should further consider the lifespan of each building element. This should include whether the feature can be repaired, reused or recycled in future. You should also consider the frequency that this must be undertaken. This will help to reduce whole life cycle emissions.

### 1.4.2 Heritage assets

Additional consideration will need to be given if your home is listed or within a Conservation Area. You can check if your property is listed or within a Conservation Area by using Southwark Maps. Further information can also be found on heritage assets in the Heritage SPD (2021).

#### *Listed Buildings*

If your home is listed, Listed Building Consent will be required for most works covered in this SPD. This is often in addition to planning permission but there are works where only Listed Building Consent is required. This has been set out in the relevant sections of this SPD.

You will have to consider the impact your planned works will have on the special interest of your listed home. This is underpinned by the Planning (Listed Buildings and Conservation Areas) Act 1990. Special care needs to be taken to ensure any original or historic fabric is retained in any works. This refers to any original or historic features such as windows or doors as well as walls within your home. Special care also needs to be taken to ensure any planned works do not detract from the external appearance of your home. This is generally of great importance to the character, significance and historic interest of the Listed Building.

You will also need to check whether your home is listed as part of a group of buildings. If so, you will need to consider the impact any works would have on the significance of the wider listed group. Group listing commonly applies to terraced properties. The whole terrace is usually included in the listing as opposed to one individual home. If your home is group listed, you will need to ensure any works maintain consistency across the group and do not introduce features which will detract from the Listed Buildings. You can find out whether your home is group listed in the Listed Building description. The description will refer to your property's address on its own or part of a wider group.

Guidance is provided within each relevant section on how to ensure planned works are appropriate for Listed Buildings. Some works may not be acceptable at all within a Listed Building. Alternative solutions are proposed in these cases.

## Conservation Areas

If you live in a Conservation Area, you will need to consider the impact any planned works would have on the wider area.

Works need to be sympathetic to the individual character of the Conservation Area. There may be a dominant style of window or defining feature which is important to the area's character. This character is required to be preserved or enhanced by any proposed works. This is underpinned by the Planning (Listed Buildings and Conservation Areas) Act 1990.

Each Conservation Area has its own Conservation Area [Appraisal](#). The appraisals outline the special importance of the area and its defining character. The appraisals also set out guidance on the type of development allowed in the area. This includes the most common materials and which materials are considered inappropriate.

It is recommended you read the appraisal for your area before planning works. Guidance can change between Conservation Areas as it reflects each area's own character.

### 1.4.3 Trees

Trees are very important to the borough and the council has a duty to protect them under the Town and Country Planning Act 1990. This can be done by placing a Tree Preservation Order (TPO) on the trees.

Trees improve the amenity of an area and have other environmental benefits. The benefits of trees include to:

- Provide landscaping
- Provide shading
- Provide habitats for biodiversity
- Improve air quality
- Reduce the urban heat island effect
- Reduce surface water flood risk

Trees are also important for carbon storage (especially mature trees) and enhance the borough's climate resilience.

You will need to apply to work on protected trees if your proposal could affect trees protected by a TPO or trees in Conservation Areas. You can check if a tree on your property is protected by a TPO or in a Conservation Area by using [Southwark Maps](#).

# CHAPTER 2

# ENHANCEMENTS AND ALTERATIONS

## 2 ENHANCEMENT AND ALTERATIONS

### 2.1 Introduction

This chapter sets out the enhancements and alterations a resident can consider when looking to improve their home. This refers to works which seek to improve the appearance, energy efficiency or thermal performance of your home. There is further guidance on other additions that can be made to your home such as cycle or bin storage.

This chapter also provides guidance on any relevant planning considerations. These could include design quality, impact on neighbours, and impact on heritage assets (such as Listed Buildings and Conservation Areas).

Some enhancements and alterations are [permitted development](#) subject to conditions and limitations. This guidance should be read alongside the Permitted Development (Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

### 2.2 Key considerations

There may be many factors which need to be considered before planning works to your home. This will depend on the type of property you live in and where it is located.

#### 2.2.1 Whole Building Approach

We encourage a 'Whole Building Approach' when planning works to your home. This involves considering your whole home when trying to improve energy and thermal performance.

A home performs best when many (or all) parts are functioning, rather than one element. Piecemeal improvements can result in suboptimal performance and unforeseen issues. This could include increased condensation or mould growth. Certain additions will not be as effective if an existing feature is not working. For examples, heat pumps will not function as well as expected if your windows are draughty.

**Figure 3** on the next page demonstrates a Whole Building Approach to improving your home. The approach shows which parts of your home to consider first. This ranges from small fixes such as draught and damp proofing to larger interventions. Often the small fixes can be a simple and cost-effective way to improve the thermal performance and energy efficiency of your home. This can also help make your home more resilient to the effects of a changing climate.

The guidance in this chapter is structured to follow this Whole Building Approach.

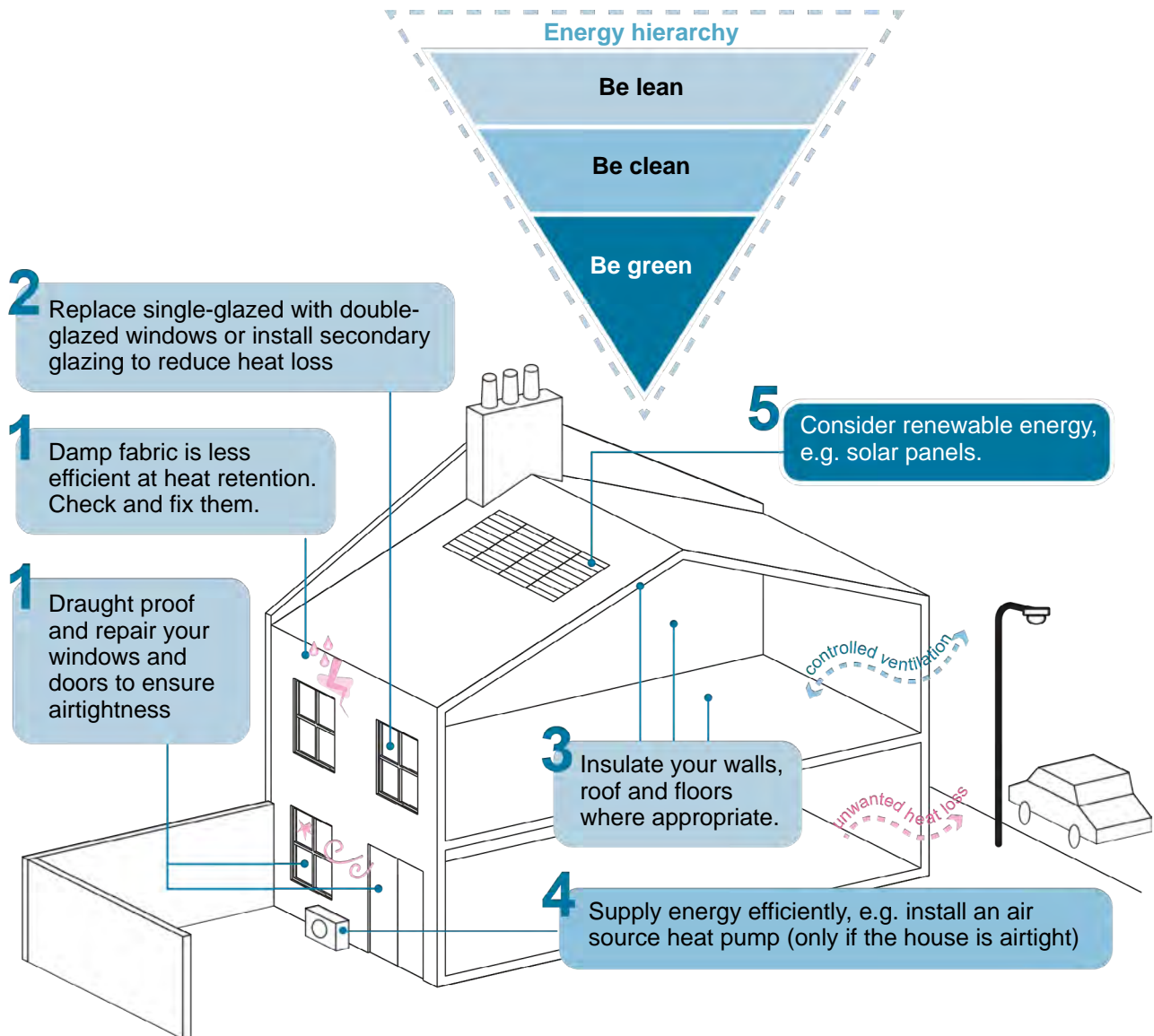


Figure 3: Illustrative diagram of the Whole Building Approach

### 2.2.2 Heritage assets

Special care needs to be taken when planning improvement works if your home is listed or within a Conservation Area.

The work should not harm the character of your home, or the area and care should be taken to avoid adverse impact on historic features. The works could also risk the long-term deterioration of the building or features.

The aim should be to improve the performance of your home as far as practical. Often, the least disruptive intervention should be sought. For example, insulation could be better placed internally rather than externally. This is because the external appearance of a listed home or Conservation Area is very important. Placing insulation externally may disrupt its character or impact a historic feature such as a brick wall.

Further guidance on energy performance standards in historic buildings is available from Historic England.

## 2.3 Windows and external doors

Windows and external doors help to keep your home light and secure and are important for ventilation. They also contribute positively to the composition and appearance of your home and help to give a consistent appearance to the surrounding area.

Windows and external doors can generally be the least insulated features of homes, especially as glass within windows transmits the heat and cold easily. Repairing or draught proofing may improve the thermal performance of your windows and external doors without the need for replacements. Repairs can also fix cosmetic issues.

Windows and doors do however have a lifespan and sometimes they will need to be replaced. You may also wish to install new windows or external doors where they have not existed previously.

### 2.3.1 Draught proofing

#### Is permission required for draught proofing?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not required.	Planning permission is not required.	Planning permission is not required.	Neither planning permission or Listed Building Consent is required.

Table 2: 'Is permission required for draught proofing?'

Draughts in windows and doors are unwanted gaps which let cold air in and warm air out. Draught-proofing your windows and external doors is a cost-effective intervention to reduce heat loss and keep your home warm. It is also the least intrusive method of improving thermal performance.

Draught proofing can help to regulate the internal temperature during extreme weather events such as heatwaves or cold snaps. This can help make your home more resilient to the effects of a changing climate.

Once implemented, it is likely that less energy will be required for heating your home. Draught proofing can also reduce the amount of dirt and dust entering your home.

It is important to have the right amount of ventilation when considering draught proofing to prevent damp and condensation building up.

You do not need planning permission or Listed Building Consent to draught proof your windows or external doors.

**Figure 4** on the next page demonstrates how to find and fix gaps within your home.



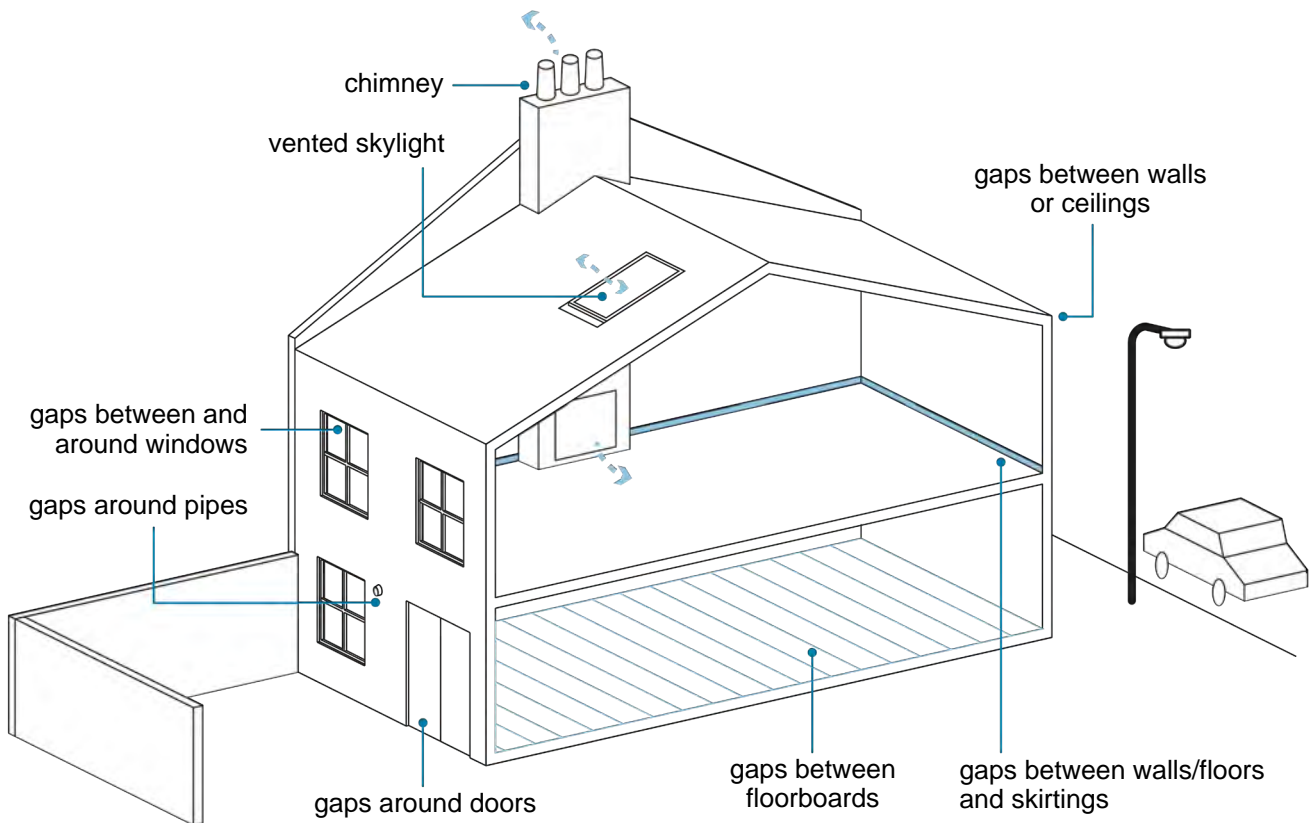


Figure 4: Find and fix gaps

### 2.3.2 Repair of windows and external doors

#### Is permission required for repairing existing windows or external doors?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not required.	Planning permission is not required.	Planning permission is not required.	Neither planning permission or Listed Building Consent is required.

Table 3: 'Is permission required for repairing existing windows or external doors?'

Before deciding to replace windows and doors, the option to repair should be considered.

The full replacement of windows and doors may not always be necessary. For example, if there is damage or rot to only one section of a window or door, it may be more cost-effective to repair instead of replacing.

Repair is preferable to replacement for the following reasons:

- Repair is often cheaper.
- Seasoned timber used in older windows or doors is often of higher quality and durability than modern timber.
- Original windows and doors in older buildings can give your home character and improve the appearance overall.
- Repair is more sustainable and reduces carbon emissions associated with manufacturing new replacements.

Examples of repairs to existing windows and doors include:

- Work to maintain and repair the foot of doors and the base of frames where they have suffered rot or other damage.
- Replacing plain panes of glass, where broken, to match the existing.
- Repainting the frames.
- Repairing the seal on double-glazing

You do not need planning permission or Listed Building Consent to repair existing windows or external doors. Further guidance on repairs within Listed Buildings can be found on Historic England's [website](#).

If your windows and doors are beyond repair and require full replacements, please refer to [section 2.3.5](#) for guidance.

### 2.3.3 Double glazing

You may wish to replace your windows with double-glazed units to improve the thermal performance of your home. Double glazing is a window which has two panes of glass, separated by a sealed gap which reduces heat transfer. Double glazing can provide better insulation for your home as it can prevent cold air entering a room whilst also retaining heat. This can help regulate internal temperatures during extreme weather events (such as heatwaves or cold snaps) and make your home more resilient to the effects of a changing climate.

Other benefits of double glazing include:

- Reduced condensation and mould (from airtight seals)
- Noise reduction (from thicker panes and the air gap in between)
- Heightened security (from thicker panes being harder to break)

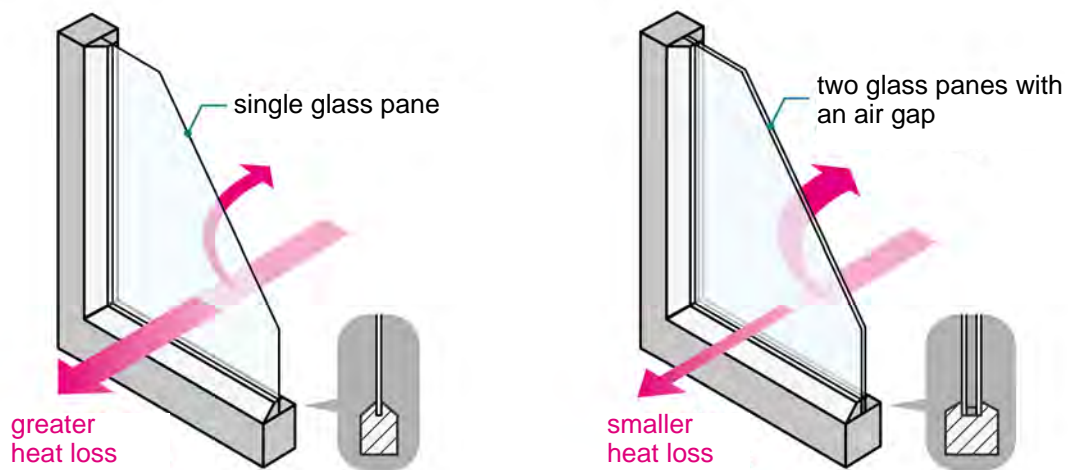


Figure 5: Single glazing compared with double glazing

We **encourage the use of double glazing within most homes in the borough**, given the many benefits. Double glazing is permitted within Conservation Areas; however, the windows need to reflect the character of the area and be of a traditional or sympathetic design and material.

Guidance on how best to replace your windows and whether planning permission is required is detailed in [section 2.3.5](#).

## Listed Buildings

**Double glazing is not permitted in Listed Buildings**, including slim versions. It may be replaced if double glazing has been permitted in the past or part of the original build.

This is in line with Historic England's guidance which encourages the retention and repair of historic features such as windows.

The use of double glazing is considered harmful to Listed Buildings. It often involves the removal of historic and original windows and introduces modern features which are not authentic or compatible. Most Listed Buildings in the borough are historic, dating from the Victorian or Georgian period. By contrast, double glazing is an inherently modern feature which is not usually seen as sympathetic or in keeping with the age and character of our Listed Buildings.

It can often be three times the thickness of the existing single glazed windows. This would disrupt the historic detailing of a Listed Building and alter its appearance and overall character. Many of the listed homes within the borough are also in groups or terraces where single glazing is retained across all the buildings. The introduction of double glazing here can disrupt the uniformity of these listed terraces or groups

We are aware of the need to improve the thermal performance of listed homes, and to address climate emergency and the Southwark Climate Change Strategy. However, Listed Buildings only account for around 2% of all buildings in Southwark. Once lost, historic or original windows are irreplaceable.

There are also other ways to improve the thermal efficiency of Listed Buildings. This could involve secondary glazing ([sections 2.3.4](#)) or internal insulation ([section 2.4.1-2.4.2](#)). Existing windows within Listed Buildings can also be draught proofed ([section 2.3.1](#)) or repaired ([section 2.3.2](#)).

### 2.3.4 Secondary glazing

#### Is permission required for installing secondary glazing?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not required.	Planning permission is not required.	Planning permission is not required.	Listed Building Consent is required, but not planning permission.

Table 4: 'Is permission required for installing secondary glazing?'

Secondary glazing is different to double glazing in that the existing window remains unaltered. It involves the installation of a separate internal window on the inside of the existing window. This replicates the airtight seal and insulation gap offered by double glazing. Secondary glazing can offer the same benefits of double glazing. This includes increased insulation and noise reduction.

Secondary glazing can be installed to replicate the existing arrangement of the window. It can also be fixed shut or installed with a horizontal or vertical opening. Keeping the secondary glazing openable allows access to the existing window so it can still be opened, cleaned and maintained. Secondary glazing can also be designed to be removable in warmer months when extra insulation is not needed.

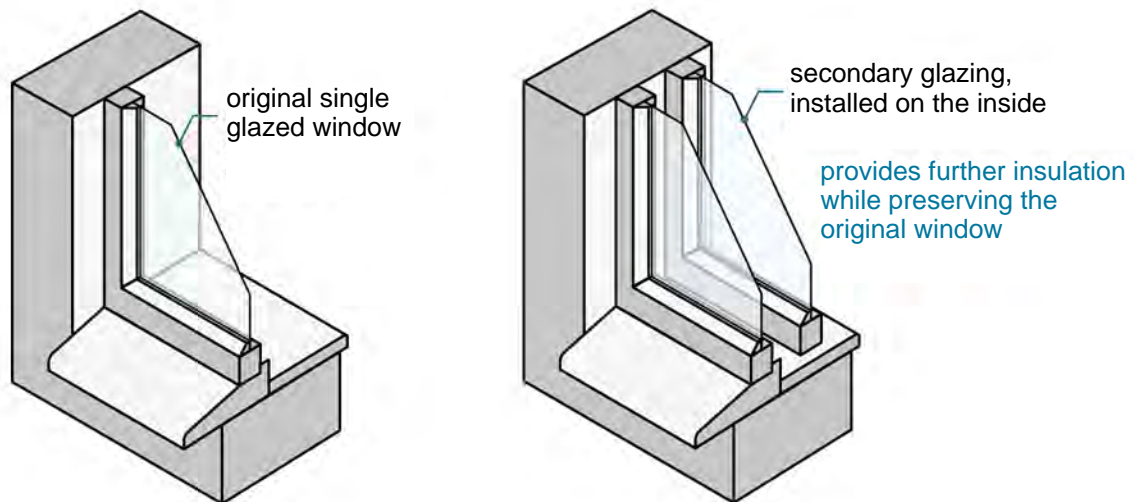


Figure 6: Secondary glazing

The use of secondary glazing is a useful approach within Listed Buildings, where double glazing is not permitted. Secondary glazing provides similar benefits of double glazing without having to replace historic or original windows. This better preserves the character of your home.

You do not need planning permission for the installation of secondary glazing. Listed Building Consent will however be required if your home is listed.

### 2.3.5 New or replacement windows or external doors

#### Is permission required for new or replacement windows or external doors?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
<p>Planning permission is generally not required unless the proposal falls within the list of exceptions of permitted development.</p>	<p>Planning permission is generally not required if the windows or external doors are like-for-like replacements.</p> <p>External doors refer to the door which accesses the street or outside area.</p> <p>New windows or external doors will require planning permission.</p>	<p>Planning permission is generally not required if the windows or doors are like-for-like replacements.</p> <p>Planning permission is not generally required for new windows or external doors, unless an Article 4 Direction is in force.</p>	<p>Listed Building Consent will be required as well as planning permission in some circumstances.</p>

Table 5: 'Is permission required for new or replacement windows or external doors?'

Refer to [section 3.6](#) in Chapter 3 for guidance on new or replacement dormer windows.

#### Houses

You do not generally need planning permission for new or replacement windows or external doors within houses as the works are [permitted development](#). Different requirements and restrictions apply if your home is listed or within a Conservation Area. You will also need to apply for Listed Building for works to a listed home. This guidance is provided in the next sections.

Planning permission is not required if the new or replacement windows or external doors are similar in appearance to the existing at your home. Planning permission will be required if the appearance of your home will be noticeably changed.

A similar in appearance window or external door should keep the dimensions and overall arrangement of the existing. The material, colour and glazing type may change. [Fact box 1](#) provides further examples of similar in appearance windows and doors.

Planning permission will also be required if any of the following applies:

- The new window(s) is for an upper floor on the side of your house (including the roof slope) and would be clear-glazed. Windows which are obscured-glazed in this position do not need planning permission.
- The new window(s) is for an upper floor on the side of your house (including the roof slope) and is openable at a level less than 1.7m above the floor of the room in which it is installed.
- Permitted development rights have been removed by an Article 4 Direction or a condition attached to an earlier planning permission restricting the use of windows or doors.

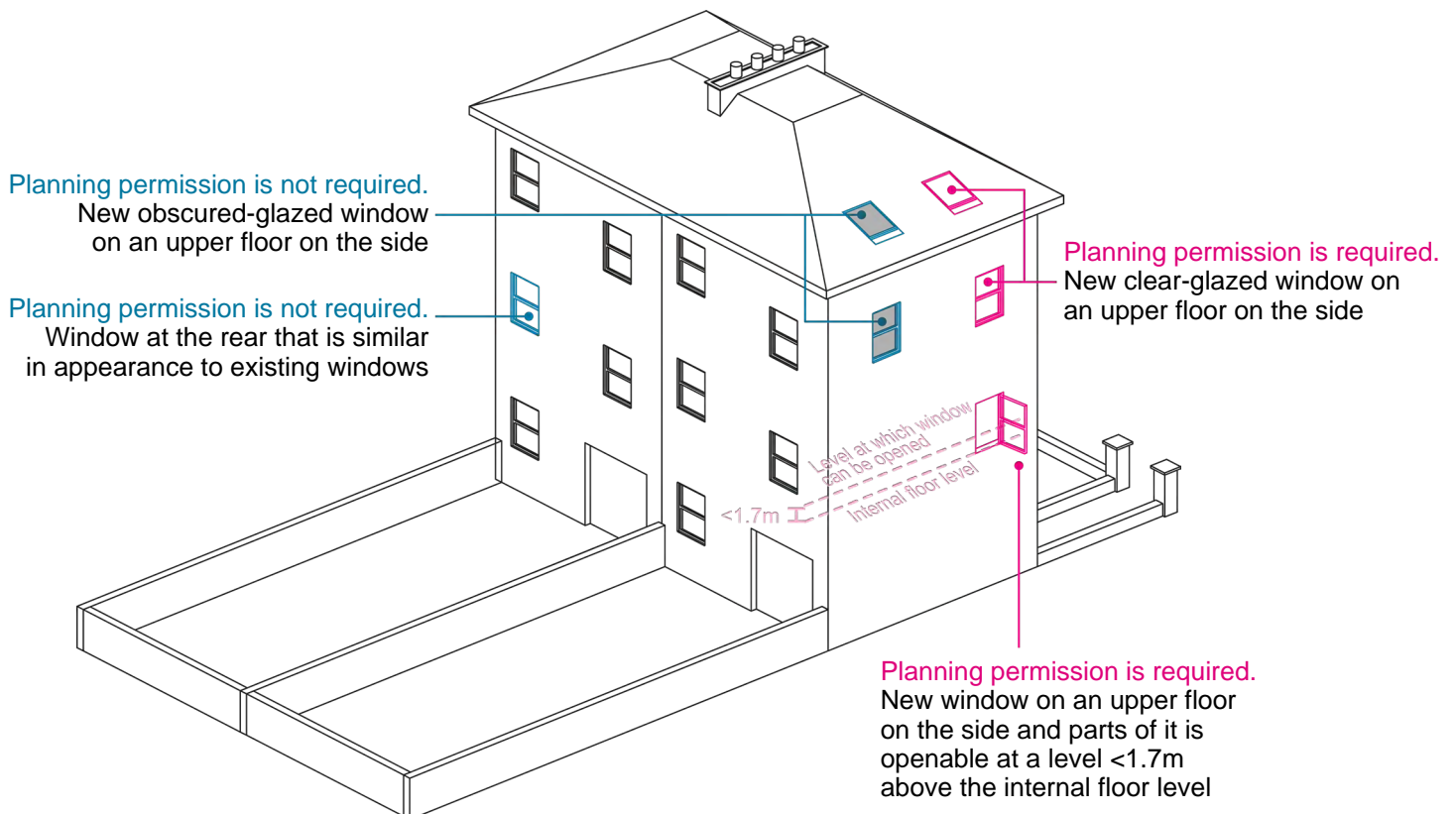


Figure 7: Permitted development right for new or replacement windows

## Flats and maisonettes

*i*

External doors refer to the door which accesses the street or the outside area of your building.

Planning permission is not required for like-for-like replacement windows or external door(s). The replacements would have to be the same material, size and design to be like-for-like. The glazing type can be changed. This means you can change from single to double glazing and still be considered like-for-like. **Fact box 1** provides further examples of what is a like-for-like replacement.

Planning permission will be required for new windows or external doors or for replacements which are not like-for-like.

Different requirements and restrictions apply if your home is listed or within a Conservation Area. You will also need to apply for Listed Building for works to a listed home. This guidance is provided in the next sections.

Care should be taken to ensure any new or replacement windows or doors are sympathetic to the existing windows at the property. This is to ensure consistency across all the flats or maisonettes within a block.

If you are a leaseholder, you may also need to gain permission from the freeholder of the site before being able to carry out the works. The freeholder may also have their own requirements and restrictions on works.

## Conservation Areas

Planning permission is not required if the replacement windows or external doors are like-for-like. The replacements would have to be the same material, size and design to be like-for-like. The glazing type can be changed. This means you can change from single to double glazing and still be considered like-for-like. **Fact box 1** provides further examples of what is a like-for-like replacement.

Planning permission will be required for new windows or external doors or for replacements which are not like-for-like.

Original or historic windows or doors should be repaired where possible. This can often be cheaper than replacement, given the high quality and durability of older timber. More guidance on repairing windows and doors is provided in **section 2.3.2**.



Where replacements are required or new windows or doors are to be added, the historic importance and character of the Conservation Area should be considered. The windows or doors would need to be in a style and material which is sympathetic to the area and maintain or improves its overall appearance. Detailed assessments of the importance and character of each Conservation Area can be found within the area appraisals.

Generally, we require the use of traditional materials such as timber within Conservation Areas. Traditional materials tend to last longer than modern substitutes, giving better value and being more sustainable over time. Metal windows or doors will be permitted in certain areas. However, this is generally only to the rear or non-public facing elevations. Windows and doors should also be painted in traditional colours. Windows are generally expected to be off-white. However, doors can be painted in a broader range of heritage colours such as navy, maroon, dark green or black. Garish colours will not be permitted.



Guidance can change between Conservation Areas, and it is recommended you read the appraisal for your area before planning works as this will state which materials and colours are acceptable.

UPVC (Unplasticized Polyvinyl Chloride) will not be permitted in any of our Conservation Areas, even to the rear of a property. UPVC generally appears out of place in Conservation Areas, owing to the plastic appearance. UPVC also may weather or behave differently from natural and more traditional materials. The replacement of UPVC windows or doors with more sympathetic, traditional materials is encouraged.

New or replacement windows or doors must maintain the quality of design at your home. Features such as the depth of reveal should be retained (see [Figure 8](#)). Doors should be of traditional design, generally panelled or boarded. These should be a painted timber rather than stained hardwood. Modern designs such as metal framed, or sliding may be acceptable in places.

There should also be a continuation of the established hierarchy of windows at your home. Generally, windows are larger or more ornate at the lower levels of a house, reducing in size and decoration on the upper levels (see [Figure 9](#)). This should be respected with any new or replacement window. Overly large windows will not be permitted at the upper levels of properties, even to the rear.

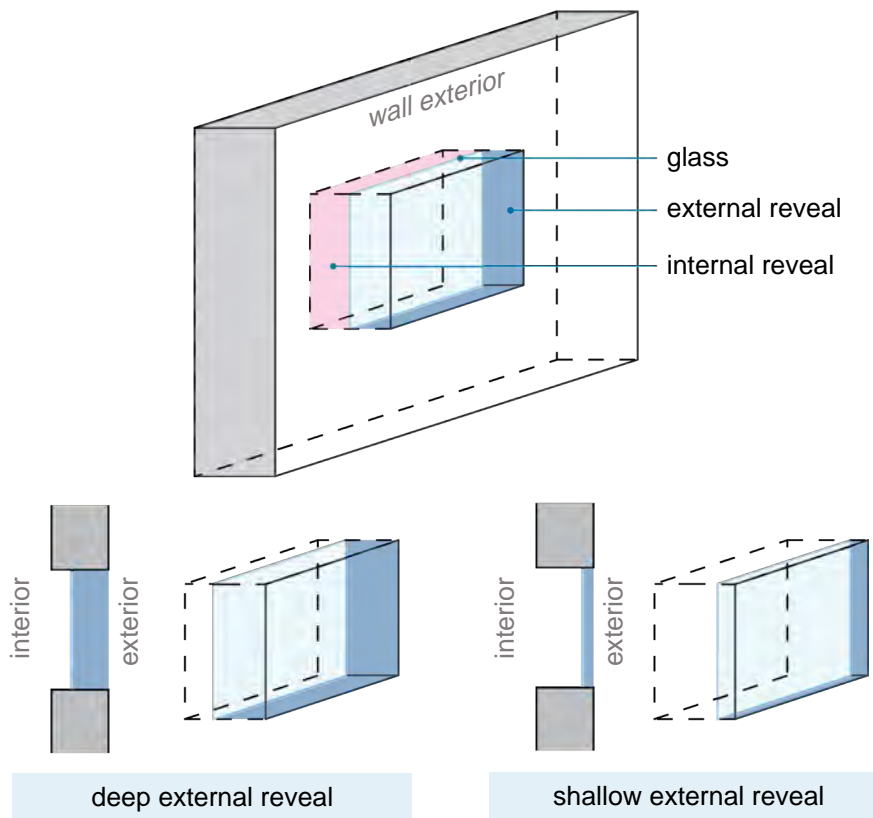


Figure 8: Depth of reveal

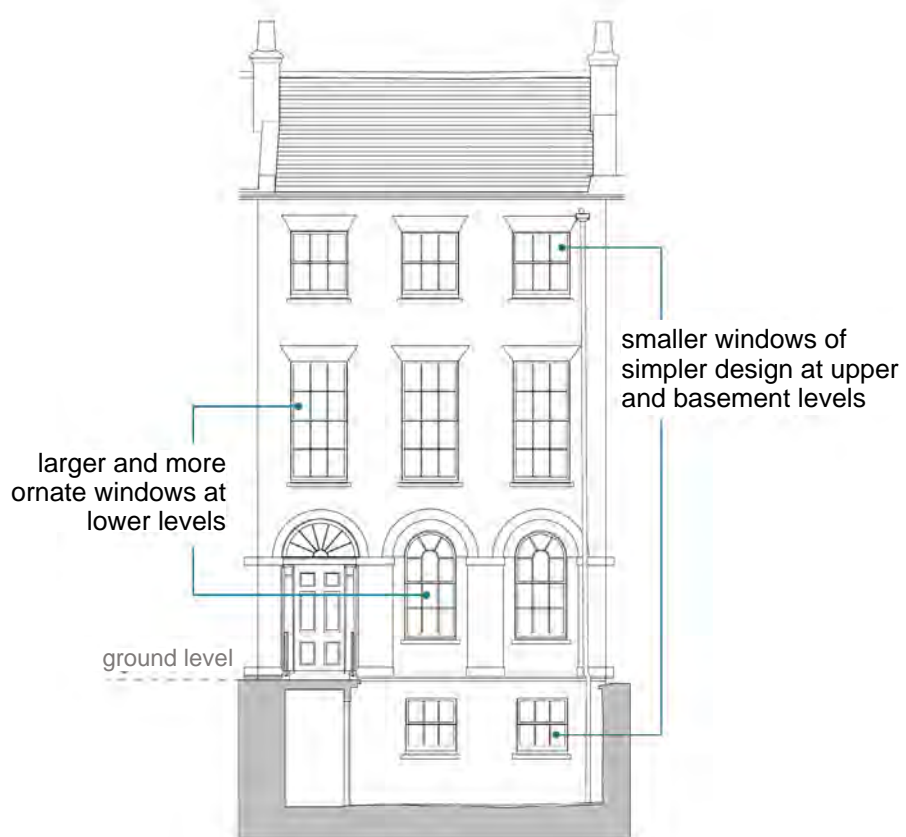


Figure 9: Typical window fenestration

## *Listed Buildings*

Listed Building Consent is required for any new or replacement windows or doors within Listed Buildings. This applies to both internal and external doors at your home.

### *Replacement windows or doors*

Replacement windows or doors would need to be like-for-like with the existing at your home. The replacements would have to be near replicas of the existing windows and doors. The glazing type would also have to remain the same. Double glazing is not permitted in Listed Buildings. It may be replaced if double glazing has been permitted in the past or part of the original build. **Fact box 1** provides further examples of what is a like-for-like replacement.

The replacement of windows or doors within Listed Buildings will not be permitted unless it can be demonstrated that the existing versions are beyond their lifespan, and it is not economically viable to pursue repairs. Modern windows or doors of unsympathetic design and materials can be replaced with an appropriate alternative.

Original or historic windows or doors should be repaired where possible. This is often a cheaper cost than replacement, given the high quality and durability of older timber. Repairing windows or doors in Listed Buildings can also better insulate your home. For example, a full repair of a sash window could include the restoration of its frame, a re-hanging of the internal counterweights and the installation of draught seals. Such repairs can reduce draughts and improve the thermal performance of your home. It also ensures original or historic features are preserved. More guidance on repairing windows and doors is provided in section 2.3.2.

You will need to include a condition survey as part of a Listed Building Consent application to replace your windows or doors. It is required to justify replacement instead of repair. It should include a breakdown of the status and photographs of each individual window or door proposed to be replaced.

### *Creation of new windows or doors*

You may be able to create new window or door openings in your home, provided it does not cause harm to the significance of the Listed Building.

The installation of a new window or door will generally involve the removal of a section of wall to create a new opening. Consideration must be given to the location of any new window or door and the impact this will have on the significance of the Listed Building.

Any new window should continue the established hierarchy of windows at your home and be in keeping with the style and design of existing windows. Overly large windows or doors or those in an unsympathetic material or design will not be permitted, even to the rear. Exceptions may be made when new doors or windows are proposed as part of new extensions.

## General considerations

UPVC (Unplasticized Polyvinyl Chloride) will not be permitted in Listed Buildings, even to the rear of a property. UPVC cannot match the sections and proportions of historic joinery and cannot replicate the appearance of traditional materials. If UPVC windows or doors have been installed in the past, their replacement with more traditional materials is encouraged.

New or replacement windows or doors must maintain the same design quality as the existing versions. Features such as the depth of reveal, sympathetic materials and glazing pattern should therefore be retained (see [Figure 8](#)).

You will also need to check whether your home is listed as part of a group of buildings. If so, you will need to consider the impact any works would have on the significance of the wider listed group. You can find out whether your home is group listed in the Listed Building description. The description will refer to your property's address on its own or part of a wider group.

i

### Fact box 1: What is considered 'similar in appearance' and 'like-for-like'?

A new or replacement window or door is considered 'similar in appearance' if it follows the arrangement and dimensions of the existing. The glazing bar pattern, material, colour and glazing type may be changed.

A 'like-for-like' replacement is a window or door which matches the arrangement, glazing bar pattern, dimensions, material, and in some cases, colour of the existing. The glazing type does not need to be retained unless it is for a Listed Building. A like-for-like replacement is important to ensure any new window or door retains the character and appearance of a home.

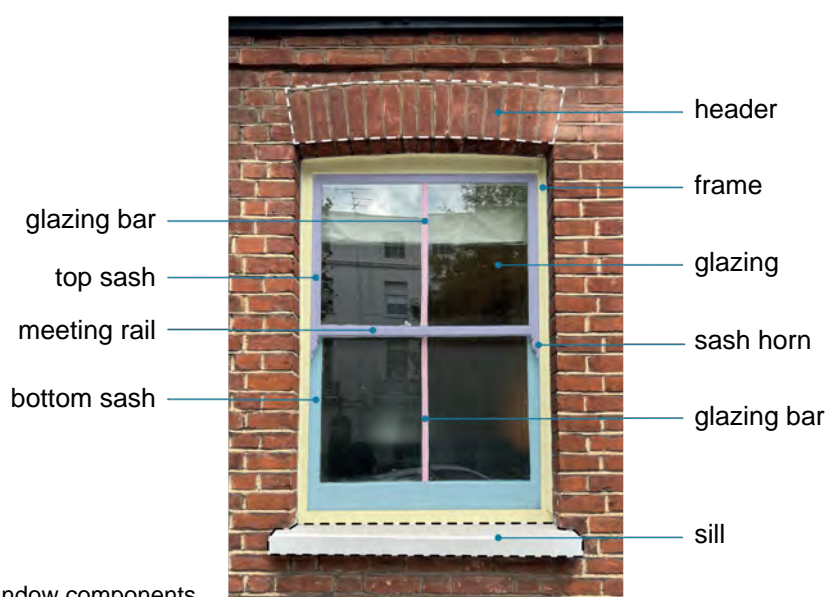


Figure 10: Window components

### Arrangement

Arrangement refers to the glazing bar pattern or style of glass panes in a window or door.



Similar in appearance	Like-for-like
<p>To be considered 'similar in appearance' the overall arrangement and style must be retained. For example, a large single pane casement window can be split into two and still be considered 'similar in appearance'. However, if you wanted to replace a rectangular casement window with a circular window then it would not be considered similar in appearance.</p> <p>The arrangement should also broadly match the other existing windows or doors at the property. For example, if you are replacing one window at the front of your property then the replacement would be expected to be consistent with the other windows at this elevation.</p>	<p>To be considered 'like-for-like' the overall arrangement would have to replicate the existing window or doors at your home.</p>

*Material*

Similar in appearance	Like-for-like
<p>The material of a replacement window or door does not need to match the existing to be considered 'similar in appearance'.</p> <p>For example, an aluminium door can be used to replace a UVPC door if the overall arrangement and dimensions are retained.</p>	<p>A like-for-like replacement would be expected to be the exact same material as the existing. For example, a timber window or door cannot be replaced with an aluminium or UVPC replacement as this constitutes a change in the material. Even if all other elements of the window or door such as the arrangement or colour are replicated, the material must also be the same as the existing. This also includes windows or doors finished to look like other materials (i.e., a UVPC replacement finished to look like timber).</p> <p>A change in material will be permitted if the new material is an enhancement over the original. For example, a UVPC window or door will be permitted to change to a timber version (especially in a Conservation Area or Listed Building) as this material is of a higher design quality.</p>

## Dimensions

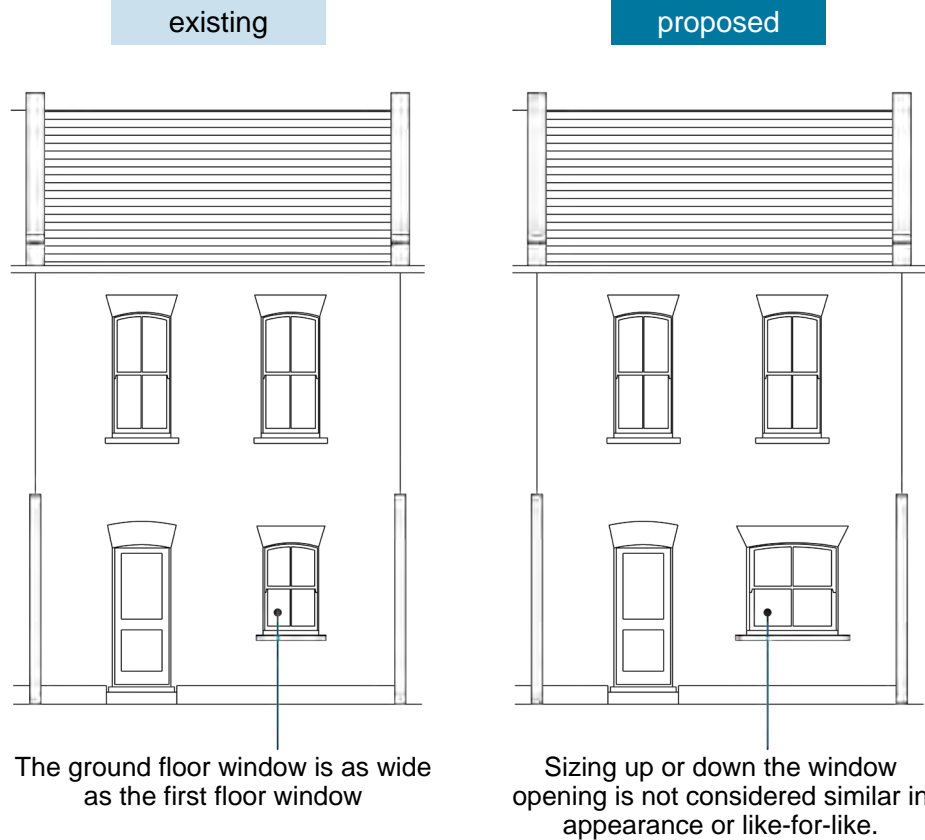


Figure 12: Window dimensions

Similar in appearance	Like-for-like
<p>A replacement window or door is not considered to be similar in appearance if it increases or decreases the existing opening. Replacement windows and doors should be the same size as the existing.</p> <p>Planning permission will be required if the existing window or door opening is being extended or reduced.</p>	<p>A replacement window or door is not considered to be a like-for-like replacement if it increases or decreases the existing opening. Replacement windows or doors should be the same size as the existing.</p>



*Colour*

Similar in appearance	Like-for-like
<p>The colour of a replacement window or door does not need to match the existing to be considered 'similar in appearance', however it does need to be in line with the other windows or doors at your property.</p>	<p>If the colour of an existing window or door contributes to the significance of a Listed Building or surrounding Conservation Area, then it should be replicated on any replacement.</p> <p>For example, if most windows within a Listed Building or Conservation Area are off cream then any replacement window should be off cream also. If there is no common colour of windows or doors within a Conservation Area, then any other heritage colours would be considered appropriate.</p>

*Glazing type*

Similar in appearance	Like-for-like
<p>The glazing type refers to whether a window or door is single or double glazed. The glazing type does not need to be retained to be considered similar in appearance.</p> <p>For example, a single glazed window can be replaced with a double-glazed window if it is considered similar in appearance in all other respects.</p>	<p>The glazing type refers to whether a window or door is single or double glazed. Unless the building is listed, the glazing type does not need to be retained to be considered 'like-for-like'.</p> <p>For example, a house within a Conservation Area could replace a single glazed window with a double-glazed version if it is considered like-for-like in all other respects.</p>



## 2.4 Insulation

### Is permission required for insulation?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not required unless the external appearance of a building is changed.	Planning permission is not required unless the external appearance of a building is changed.	Planning permission is required for external but not internal insulation.	Listed Building Consent and planning permission are required.

Table 6: 'Is permission required for insulation?'

Insulation is one of the best ways to improve the thermal performance of your home. It can protect your home from excessively hot or cold temperatures. This can help to make your home more resilient to the effects of a changing climate. Insulation can also reduce noise pollution.

Insulation is a general term to describe products which reduce heat loss or gain by providing a barrier between areas that are very different in temperature. Common insulation materials used in homes include fiberglass, spray foam, injection foam, cellulose and mineral wool – each with its own pros and cons. More sustainable materials such as hemp are also available. Consideration should be given to the U-value of a product. The lower the value, the better the material as a thermal insulator.

Before any insulation, pre-existing issues with damp or condensation should be addressed. Otherwise, these issues may worsen.

For homes in Conservation Areas or that are listed, care should be taken to provide enough (controlled) ventilation and allow moisture to escape. Insulation materials which are compatible with traditional permeable construction (such as wool) are preferred.

A qualified insulation expert can advise on the best solution for your home. Building Control certification may also be needed for certain types of insulation.

We encourage a 'Whole Building Approach' to insulation. This means that all rooms in your home are considered, not just the ones which are the coldest or warmest. Proposals for insulation will be assessed on a case-by-case basis when a property is listed or located within a Conservation Area. You should consider the least disruptive method possible and provide robust justification for any harm expected to be caused.

### 2.4.1 Roof and loft insulation

Roof insulation can be carried out internally or externally depending on the roof type or whether the building is listed or within a Conservation Area. Flat roofs should be insulated externally where possible. Such reduces the risk of moisture building up which can lead to structural damage. Internal insulation is best suited to other roof forms such as hip or gabled. It minimises disruption to the roof which could be covered in tiles or shingles.

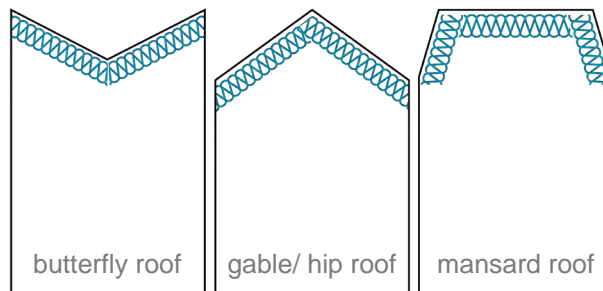
The two common methods of roof or loft insulation are 'warm roof' or 'cold roof'. Warm roofs fit the insulation to follow the slope of the roof and is best suited to habitable spaces. Cold roofs fit the insulation on top of the ceiling of the room below. It is usually carried out by laying materials between or over the joists. A cold roof insulation is best suited when the loft space is not actively used.

Any roof or loft insulation needs to be carried out by a qualified expert, who can advise on the best solution for your home.

**Internal roof insulation** - suitable when the roof is tiled.

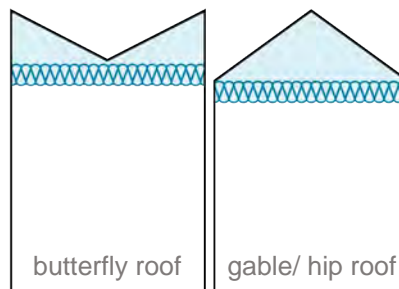
#### Warm roof

Insulation is fitted along the slope of the roof.  
Suitable when the loft space is actively used.



#### Cold roof

Insulation is fitted on top of the ceiling of the room below.  
Must be ventilated to avoid condensation and damp.



**External roof insulation** - suitable on flat roofs.

Flat roofs are often covered in modern membranes. External insulation is suitable and less likely to result in condensation.

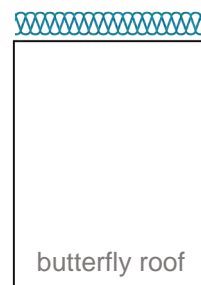


Figure 13: Roof insulation on different roof forms

### *Houses, flats and maisonettes*

Planning permission is not required for internal roof or loft insulation. External roof insulation will not require planning permission unless the appearance of your home is changed. For example, a different finishing material will be applied to the roof, or the roof will increase in size.

Different requirements apply to Listed Buildings and Conservation Areas. They are detailed in the subsequent sections.

If you are a leaseholder, you may also need to gain permission from the freeholder of the site before being able to carry out the works. The freeholder may also have their own requirements and restrictions on works.

### *Conservation Areas*

Planning permission is not required for internal roof or loft insulation within Conservation Areas.

External roof insulation will need planning permission. It is encouraged to use a finish which matches the existing roof materials. The use of inappropriate material such as UPVC will not be permitted.

### *Listed Buildings*

Planning permission and Listed Building Consent will be required for external roof or loft insulation.

Internal roof or loft insulation may be permitted in Listed Buildings if there is no harm to significant roof features such as original rafters or beams. Spray foam insulation, in particular, is considered harmful and will unlikely be permitted. It could increase the risk of condensation and decay. The foam sticks to the timbers and underside of the roof or tiles. This makes repairs in the future difficult. It is also a permanent installation, and its removal could potentially damage the historic structure.

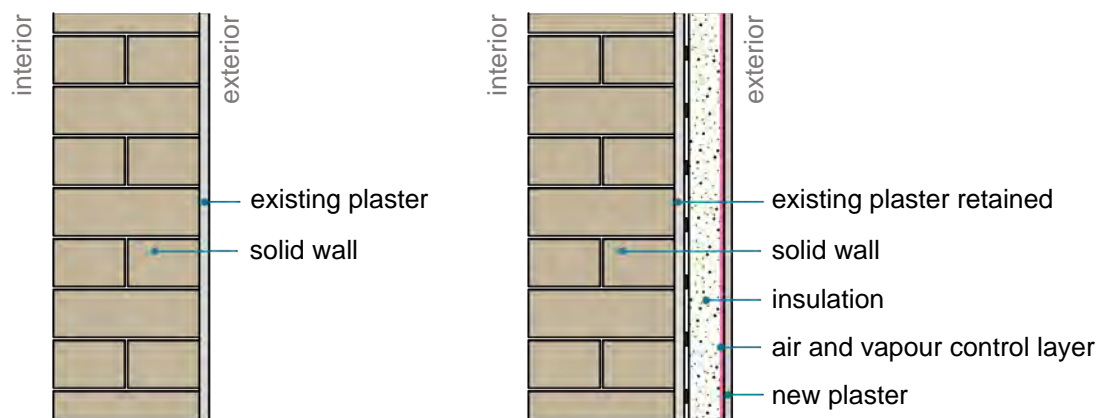
It is unlikely that external roof insulation will be permitted. The nature of the process would undoubtedly cause harm to the significance and character of the Listed Building. External works to roofs will only be considered when it can be demonstrated that the existing roof is beyond its lifespan and no longer functional.

## 2.4.2 Internal insulation

Internal insulation is generally carried out by insulating the internal or cavity walls at your home. Most homes constructed after 1920s are likely to have cavity walls, which is a wall with a hollow centre. Older homes are likely to have been built with solid walls. The appropriate method of internal insulation will depend on your wall type. Your home may also already have wall insulation, especially if it is a modern property.

Cavity wall insulation is carried out by injecting insulating materials into the gap in the middle of the wall. However, this may not be possible if the gap is too narrow. Internal wall insulation is carried out by fitting insulating boards to the inside face of your walls, or by building a stud wall and filling it with insulating materials. Internal insulation can vary in thickness. It may be disruptive to the internal appearance of your home as features such as door frames or skirting boards may need to be removed and reattached.

### Solid wall



### Cavity wall

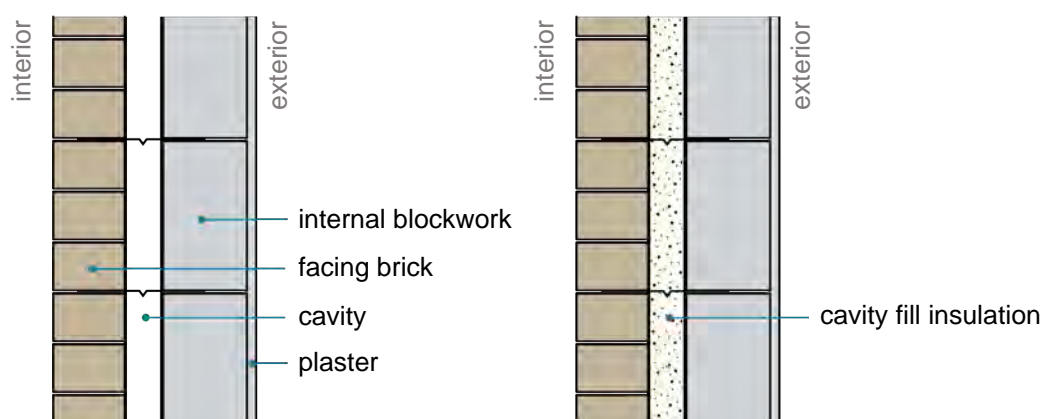


Figure 14: Solid wall and cavity wall insulation

Any internal insulation needs to be carried out by a qualified expert, who can advise on the best solution for your home.

### *Houses, flats and maisonettes*

Planning permission will not be required for any internal insulation in a house, flat or maisonette. Different requirements apply to Listed Buildings, set out in the section below.

If you are a leaseholder, then you may also need to gain permission from the freeholder of the site before being able to carry out the works. The freeholder may also have their own requirements and restrictions on works.

### *Conservation Areas*

Planning permission is not required for any internal insulation in a house, flat or maisonette. Different requirements apply to Listed Buildings, set out in the next section.

Internal insulation is encouraged within Conservation Areas as it does not impact the external façade of your home and preserves the character and appearance of the area.

### *Listed Buildings*

Listed Building Consent is required for any type of internal insulation in Listed Buildings.

The interiors of Listed Buildings are often of great significance. They contain features of architectural or historic interests. Examples include fireplaces, staircases, doors, windows, skirtings and cornices.

We will not permit internal insulation within a Listed Building if it causes harm to original walls or covers any features of significance.

### **2.4.3. External insulation**

*i*

We offer a free [pre-application advice](#) service for installing external insulation at your home. You can use this service to discuss the works with a planning officer. This could help resolve any planning policy or design issues before you make your application.

External insulation is generally carried out by cladding your home in a layer of insulation and covering it with a thin render or plaster finish. Brick slips can also be used as a finishing material in certain circumstances.

External insulation is suitable for homes which have an existing render or plaster finish as this appearance can be easily replicated. It also suits homes with solid walls or limited internal floorspace which makes internal insulation challenging. External insulation will likely require pipework and plumbing to be removed and reattached. Window sills will also need to be extended to ensure water runoff is maintained.

Any external insulation needs to be carried out by a qualified expert, who can advise on the best solution for your home.

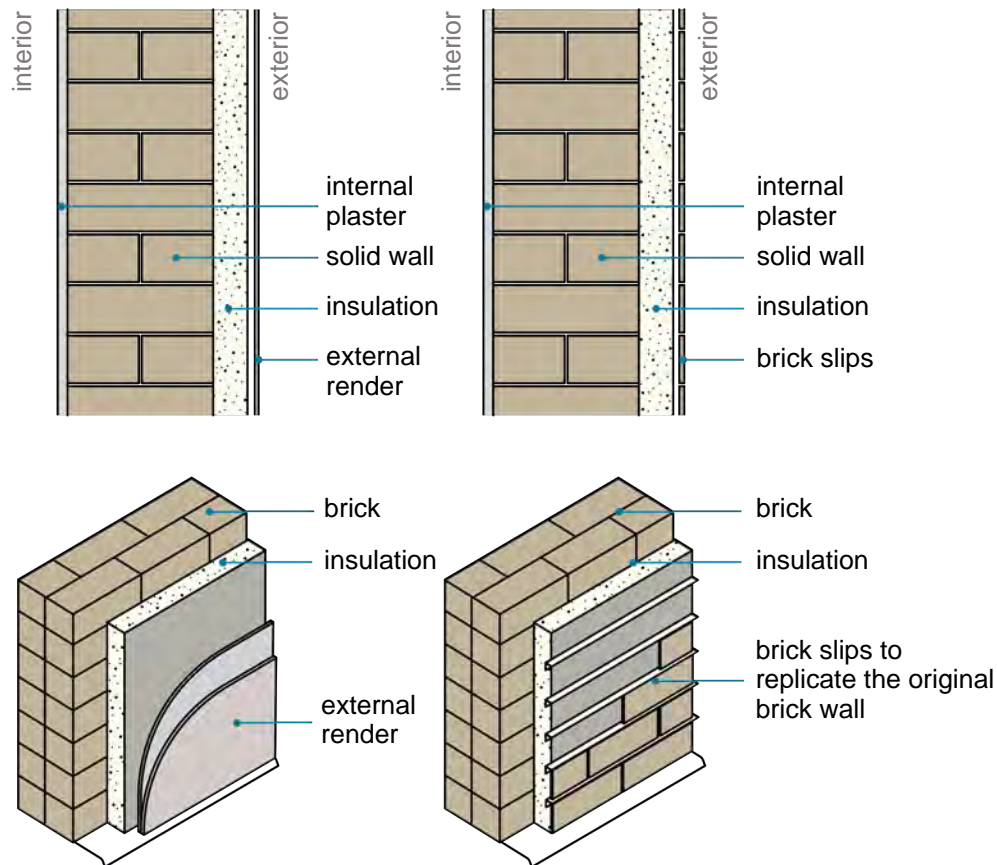


Figure 15: External insulation in render and brick slips

### *Houses, flats and maisonettes*

Planning permission will not be required for any external insulation in a house, flat or maisonette unless the external appearance of your home is changed. For example, planning permission will be required if your home is currently finished in brick but the external insulation will result in a render finish. However, if your home is currently finished in render, no planning permission will be required as the external appearance has remained the same.

Different requirements apply to Listed Buildings and Conservation Areas, set out in the next sections.

If you are a leaseholder, then you may also need to gain permission from the freeholder of the site before being able to carry out the works. The freeholder may also have their own requirements and restrictions on works.

### Conservation Areas

You will need planning permission for external insulation within Conservation Areas.

The external appearance of these homes contributes to the historic importance and character of the Conservation Area.

External insulation will not be permitted where the appearance of the building changes. This includes a change in external material or loss of key features. For example, a render finish would not be suitable at a home which is currently finished in brick. This changes the appearance of the building and lessens the design quality of the area.

External insulation is best placed on facades which are already rendered. It may also be acceptable on less visible or rear facades.

### Listed Buildings

You will need Listed Building Consent for external insulation. It is unlikely however that external insulation will be permitted.

The external appearance of a listed home is often of great significance and historic interest. Example features include original windows, doors or brickwork. External insulation will cover up such features and harm the significance and character of the building as a result.

As such, other forms of insulation should be considered.

## 2.5 Air source heat pumps

### Is permission required for installing air source heat pumps?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not generally required unless the proposal falls within the list of exceptions of <a href="#">permitted development</a> .	Planning permission is not generally required unless the proposal falls within the list of exceptions of <a href="#">permitted development</a> .	Planning permission is not generally required unless the proposal falls within the list of exceptions of <a href="#">permitted development</a> .	Planning permission and Listed Building Consent are required.

Table 7: 'Is permission required for installing air source heat pumps?'





We offer a free [pre-application advice](#) service for installing air source heat pumps at your home. You can use this service to discuss the works with a planning officer. This could help resolve any planning policy or design issues before you make your application.

Heat pumps run on electricity to provide heating and hot water. The use of heat pumps as opposed to gas boilers can reduce the cost of your heating bills and reduce your carbon footprint.

Heat pumps are only suitable if your home uses radiators or underfloor heating as its main source of heating. Your home will also need to be airtight and well insulated otherwise the heat pump will not be able to operate efficiently and may become very costly to use. You will also need enough space to fit the heat pump units.

There are two common types of heat pumps:

- Ground source heat pump: Pipes are placed under ground. It is only suitable if you have a garden or large outdoor space suitable for digging.
- Air source heat pump (ASHP): The heat pump units are placed above ground. It is suitable if you have sufficient external space to fit the unit(s) and for it to have the necessary amount of open air to function efficiently.

This guidance covers ASHPs only.

ASHPs can be very noisy. They need to be placed at least 1m from the site boundary to limit disruption to adjoining neighbours. The minimum distance may have to increase depending on the layout of your home and proximity to neighbours. Acoustic screens could be installed to reduce noise impact. The cold air discharged from air source heat pumps should not be fed into communal or actively used space.

The ASHP should also be sited sufficiently distanced from any tree root protection areas.

An ASHP should be located to the rear of your home or in areas which already have a service character, away from the principal elevations of the property. It may also be located on the roof of your home. In on the roof, it will need to be set back from the roof edge or preferably behind a parapet to minimise visual impact. ASHPs should be screened with greenery, fencing or an alternative appropriate enclosure where practical.



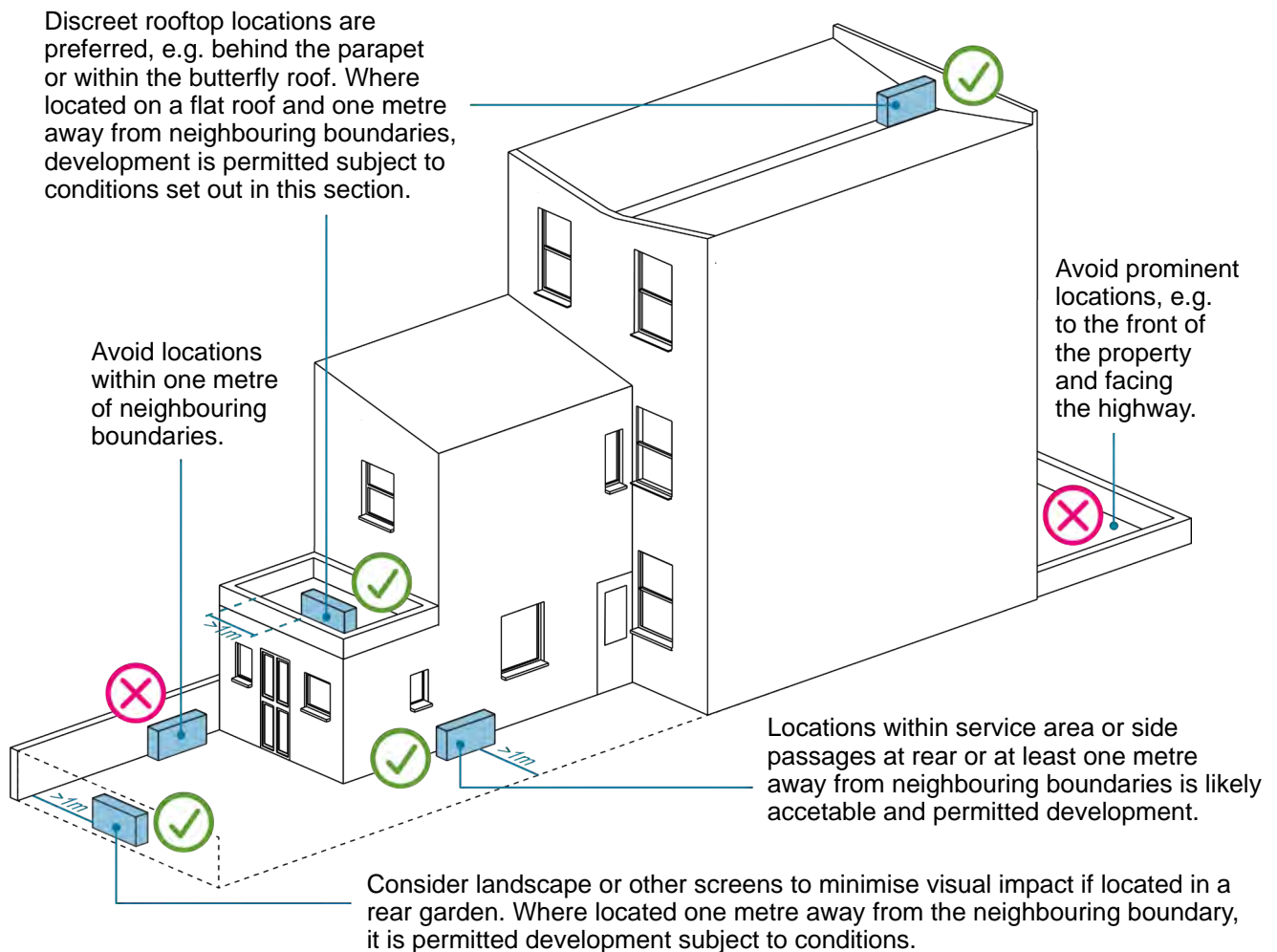


Figure 16: Siting an ASHP

You should consult the relevant experts for the best solution for your home.

### *Houses, flats and maisonettes or homes within Conservation Areas*

The installation of ASHPs is permitted development within houses, flats, maisonettes and homes within Conservation Areas, subject to the following limits:

- Development is permitted only if the ASHP installation complies with the Microgeneration Certification Scheme Planning Standards (MCS 020) or equivalent standards.
- The volume of the ASHP's outdoor compressor unit (including housing) must not exceed 0.6 cubic metres.
- Only the first installation of an ASHP would be permitted development. Additional ASHPs at the same property requires an application for planning permission.
- All parts of the ASHP must be at least one metre from the property boundary.

- Installations on pitched roofs are not permitted development. If installed on a flat roof all parts of the ASHP must be at least one metre from the external edge of that roof.
- Permitted development rights do not apply for installations within the curtilage of a Listed Building or within a site designated as a Scheduled Monument.
- On land within a Conservation Area or World Heritage Site the ASHP must not be installed on a wall or roof which fronts a highway or be nearer to any highway which bounds the property than any part of the building.
- On land that is not within a Conservation Area or World Heritage Site, the ASHP must not be installed on any part of a wall above the level of the ground floor storey if that wall fronts a highway.

The installation of ASHPs is also subject to the following conditions:

- The ASHP should only be used for heating purposes.
- The ASHP should be removed as soon as reasonably practicable when it is no longer required.
- The ASHP should be located, as far as practicable, to minimise its effect on the external appearance of your home and surrounding area.

Different requirements apply to Listed Buildings, set out in the next section.

The need to minimise the visual impact of the ASHP is of particular importance to homes within Conservation Areas. The external appearance of these homes contributes to the historic importance and character of the area. ASHPs can be intrusive as modern features.

ASHPs will not be acceptable if placed within the front garden or street facing roof of a home in a Conservation Area. ASHPs should also not be placed in any other publicly visible area of your home in a Conservation Area.

You will need planning permission if the above limits and conditions cannot be met. You may wish to apply for a Certificate of Lawfulness before installing an ASHP. This will provide a formal confirmation that planning permission is not required.

## Listed Buildings

You will need planning permission and Listed Building Consent for the installation of ASHPs if your home is listed.

The benefit of an ASHP will be limited in Listed Buildings that are not insulated or airtight. The necessary pipework and units could also compromise the integrity of the Listed Building.

We do not generally encourage the installation of ASHPs within Listed Buildings. ASHPs may be acceptable if part of a whole-building approach and demonstrating that no harm will be caused to the Listed Building.

## 2.6 Solar panels

### Is permission required for solar panels?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not generally required unless the proposal falls within the list of exceptions of <a href="#">permitted development</a> .	Planning permission is not generally required unless the proposal falls within the list of exceptions of <a href="#">permitted development</a> .	Planning permission is not generally required unless the proposal falls within the list of exceptions of <a href="#">permitted development</a> .	Planning permission and Listed Building Consent are required.

Table 8: 'Is permission required for solar panels?'



We offer a free [pre-application advice service](#) for installing solar panels at your home. You can use this service to discuss the works with a planning officer. This could help resolve any planning policy or design issues before you make your application.

Solar photovoltaic panels (PVs) convert energy from sunlight into electricity to power your home. Solar thermal systems are also available which use the similar technology to provide heating and hot water. Solar panels are most commonly fitted onto roofs and a typical system for a house will produce 5000 kWh per year.

Installing solar panels or solar thermal systems can reduce the cost of your energy bills and reduce the carbon footprint of your house's energy use.

You will need to talk to your energy provider about the most suitable solution for your home and how the generated electricity can be used.

### *Houses, flats and maisonettes and homes within Conservation Areas*

The installation of solar panels is [permitted development](#) within houses, flats and maisonettes or homes within Conservation Areas. However, there are several exceptions and conditions which need to be met, which can be found on the [Planning Portal](#). Different requirements apply to Listed Buildings, detailed in the subsequent section.

If planning permission is required, the following should be included within your application:

- A description of the solar PV and/or solar thermal system you intend to install
- The capacity (electrical output) of the proposed system (KWph)
- The number of solar panels and the area covered by the panels (m<sup>2</sup>)
- Details on any potential overshadowing from trees, other buildings and roof features.

A [Visual Impact Assessment](#) (VIA) should be included if your home is within a Conservation Area and the solar panels will be visible from a public viewpoint. It should be proportionate to the scale of the proposed works and address:

- How many panels are proposed and how they will be arranged
- How visible the panels will be from public areas
- How the proposed panels have considered the design guidelines set out in [Figure 17](#)

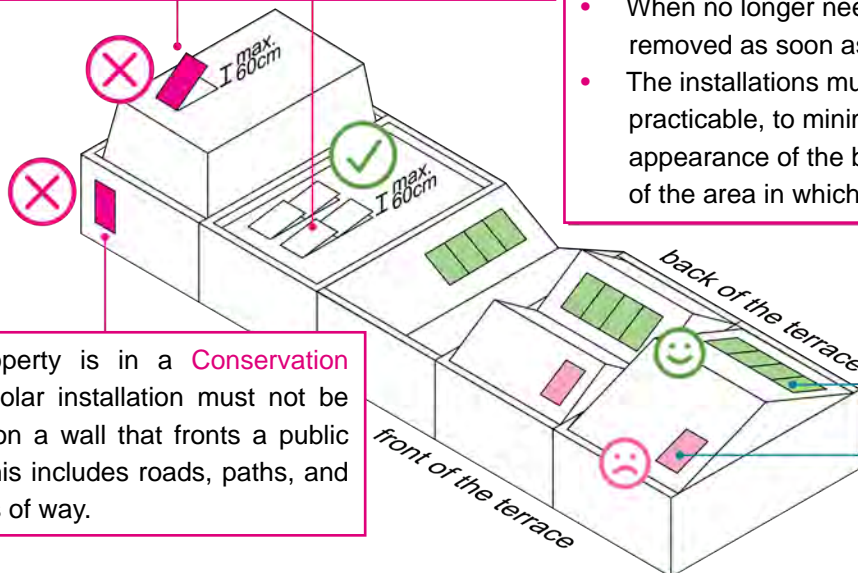
Solar panels can clutter if installed poorly. They may also appear disorderly and harm the character of your home. This is of particular concern if your home is within a Conservation Area. The external and public facing appearance of homes within Conservation Areas often contribute positively to the historic character and significance of the area and should be preserved.

Guidance on where to fit solar panels and ways to minimise their visual impact is provided in [Figure 17](#) on the next page. However, this needs to be balanced with the direction your home is facing to ensure the panels perform efficiently.

**Permitted development conditions** - Planning permission is required if you fail to meet any of the conditions.

- The solar installation must not protrude more than 0.6 metres beyond the plane of the wall or the roof slope when measured perpendicularly from the external surface of the wall or roof slope.
- The highest part of the installation must not exceed the highest part of the roof (excluding the chimney).

- The solar PV or solar thermal system must not be installed on a site designated as a **scheduled monument**.
- The solar PV or solar thermal system must not be installed on a **Listed Building**, a building within the gardens or grounds of a Listed Building.
- When no longer needed, the installations should be removed as soon as reasonably practicable.
- The installations must be sited, so far as is practicable, to minimise the effect on the external appearance of the building and the visual amenity of the area in which the building is located.



If your property is in a **Conservation Area**, the solar installation must not be positioned on a wall that fronts a public highway. This includes roads, paths, and public rights of way.

**Design principles**

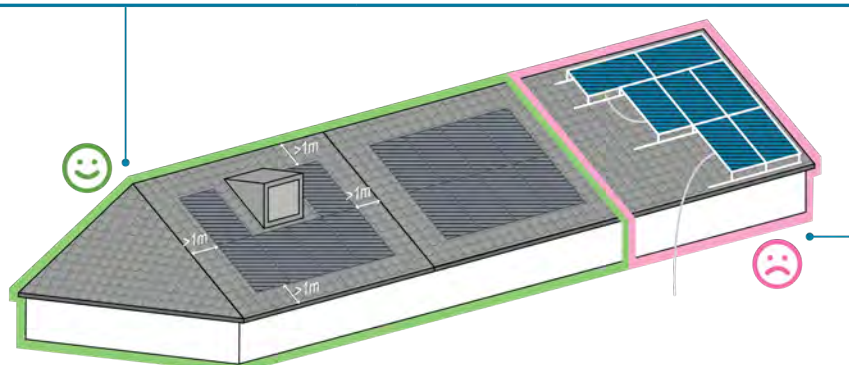
To minimise visual impact

**Position**

Install on less visible roofs where possible. Avoid installation on public-facing roofs.

	Do's	Don'ts
<b>Colour &amp; contrast</b>	Colour of the panels should match that of the roof. Frameless panels or panels with painted frames are encouraged. Use low-reflecivity panels to reduce glare.	Avoid untreated cables and frames that contrast with the colour of the roof.
<b>Arrangement</b>	Panels should be well aligned, arranged in the same direction and symmetry. Organise them carefully around roof features if any.	Avoid arranging panels in a mix of horizontal and vertical directions with zero symmetry.
<b>Spacing</b>	Panels should be evenly spaced and set in at least 1m from every edge of the roof and/or wall margins.	Avoid placing panels too close to the roof edges.
<b>Mounting system</b>	In-roof mounting system is encouraged. Panels are integrated as part of the roof instead of sitting on top of the tiles.	Avoid too much gap between the panels and roof surface. It may lead to bird nesting or leaves getting stuck under the panels. Mounting rails should not go beyond the panels.
<b>Neighbouring solar panels</b>	Try to resemble the style of neighbouring solar panels if possible.	Try not to diverge too much from the style of neighbouring solar panels.

Figure 17: Siting solar panels and design principles to minimise visual impact



### *Listed Buildings*

Planning permission and Listed Building Consent will be required for the installation of solar panels if your home is listed.

As a modern feature, solar panels are not considered to be sympathetic with many of the Listed Buildings found within the borough. This means solar panels will need to be installed sensitively and in the least disruptive form possible. Solar panels will not be permitted if adverse harm is caused to the visual appearance or historic fabric of the Listed Building.

The external appearance of a Listed Building is often of great importance to its character and significance and should be preserved. Overly visible solar panels would cause harm to a Listed Building's external appearance by introducing an inherently modern feature. Solar panels should be shallow pitched and hidden behind parapets where possible. They may also be placed on sections of the roof which are not visible to the front or rear of your property.

Solar panels may result in the loss of historic fabric as roof tiles may need to be removed for the installation. Although a few tiles may seem minor, these roofs tend to be original and historic feature. They contribute to the character and significance of the Listed Building. Great effort should be made to preserve as much historic fabric as possible. Where new tiles are required, these should be like-for-like replacements.

Ground-mounted solar panels may be a more appropriate solution for a Listed Building. Such will reduce any visual impact and avoid interaction with historic fabric.

You will also need to consider whether your home is listed as part of a group of buildings and the impact solar panels would have on the significance of the wider listed group. Group listing commonly applies to terraced properties, where the whole terrace is included in the listing as opposed to one individual home. If your home is group listed, then you will need to ensure any works maintain consistency across the group and do not introduce features which will detract from the Listed Buildings. You can find out whether your home is group listed in the Listed Building description. It will refer to your property's address or a wider group.

We welcome positive improvements to front garden which promote active design, reduce clutter and improve access to your home, especially for vulnerable residents. This can include providing space for cycle storage or enclosures for recycling and refuse bins.

## 2.7 Cycle and bin storage

Any cycle or bin enclosure is encouraged to be placed against a side boundary within the front garden, and not impede access to the front door. Storage should be kept away from the front boundary wall with the street where possible. Cycle or bin storage should not open onto the street pavement and should be accessed from within your front garden. This avoids any incursion or interruption into the public highway.

### *Cycle storage*

Cycle storage is encouraged to be fully enclosed, secure and weatherproof and be easily accessible. Cycle storage is also encouraged to be to Sheffield stand specification, which provides the most convenient and accessible form of cycle parking.

### *Refuse storage*

Refuse storage is encouraged be provided in accordance with the council's "Waste management guidance notes for residential developments" document.

## 2.8 Off street parking

### Is permission required for off-street parking?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not generally required unless the proposal falls within the list of exceptions of <a href="#">permitted development</a> .	Planning permission is required.	Planning permission is required.	Planning permission and Listed Building Consent are required.

Table 9: 'Is permission required for off-street parking?'

An application for residential off-street parking usually consists of three elements:

- Hardstanding area of your home (generally a front garden), large enough to hold a standard vehicle (at least 2.4m x 4.8m)
- A vehicle crossover to enable legal and safe access to your property from the carriageway
- The specified number of parking spaces



### 2.8.1 Hardstanding

Hardstanding refers to an area which has been paved over with a hard, non-porous material (such as concrete) for car parking. For residential off-street parking, this generally involves paving all or part of the front garden at your home.

Areas of hardstanding are not encouraged in most homes due to the negative impact on front gardens. Greenery and planting are often replaced with hardstanding materials which are less permeable. This increases rainwater run-off as it cannot be absorbed. The removal of greenery and planting also negatively impacts the character of your home (especially in Conservation Areas or listed homes). It can further detract from the appearance of the existing streetscape and impact the visual amenity of the area.

Permitted development allows for 5m<sup>2</sup> of hardstanding in a front garden. This is often not enough to fit a standard modern vehicle which generally requires 11.5m<sup>2</sup> of paving on average. You would therefore need planning permission if using hardstanding for the purpose of parking a vehicle. Permitted development does allow for paving of any size if made of a porous material (such as impermeable paving) or if provision is made to direct run-off water to a permeable or porous area.

You will need to apply for planning permission for any hardstanding or non-permeable paving if your home is a flat, maisonette, in a Conservation Area or a Listed Building as permitted development does not apply.

Planning permission may also be required for the necessary vehicle crossover to facilitate the off-street parking on the hardstanding.



Separate permission also needs to be sought from the council's Highways team for all vehicle crossovers.

### 2.8.2 Vehicle crossovers

Vehicle crossovers generally involve lowering a kerb and allowing for a car to drive across a public road and pavement to access off-street parking.

Vehicle crossovers can cause conflict with pedestrians, bicycles and vehicles by interrupting movement along a street. Vehicle crossovers also remove usable kerbside space, including on-street parking spaces available to all.



Planning permission is required for vehicle crossovers when:

- On classified roads and trunk roads
- Providing access to a property that is a maisonette or divided into flats
- In a Conservation Area
- Providing access to a listed home (permission required alongside Listed Building Consent)

Receiving planning permission does not always mean you can install a vehicle crossover. Permission for all vehicle crossovers need to be sought from the council's Highways team in addition.

There are certain highway features which cannot be moved for a vehicle crossover, such as speed humps or traffic islands. Your application for a vehicle crossover will be refused if any non-moveable features are located outside of your home. Full details of all non-moveable features can be found in [fact box 2](#).

Other features may be moveable, such as on-street electric vehicle charging points or cycle stands. The costs of the relocation would be paid by the applicant seeking the crossover. These costs can be significant and will vary depending on the feature. Your application for a vehicle crossover may still be refused if the relocation of the feature would have an adverse impact on the public highway. Full details of all potentially moveable features can be found in [fact box 3](#).

Further requirements which a vehicle crossover needs to meet are listed in [fact box 4](#).

If a crossover is to be installed, you are encouraged to follow the best practice example set out in [Figure 18](#). This is best practice guidance for all vehicle crossovers, regardless of whether planning permission is required or not.

*i*

### Fact box 2: Non-moveable features

The following list contains items that cannot be relocated or removed to install a vehicle crossover. If any of the below items are located outside of your home, your application for a vehicle crossover will be refused.

**Traffic calming features**, such as speed humps, raised tables, speed cushions and traffic islands. These are strategically placed for highway safety reasons and would be less effective, or ineffective, if relocated.

**Street trees** provide canopy cover that cleans our air, soil and water. Street trees also mitigate the urban heat island effect and reduce flood risks. Mature trees cannot be replaced as the amount of canopy cover provided by a new tree would not be a like-for-like replacement.

**Street lighting columns** cannot be located within 1.2m of the edge of a vehicle crossing due to the risk of impact from vehicles and the resulting safety issues. Relocating a street lighting column is not possible. The council need to ensure even light cover for safety at night. The council also need to prevent light pollution and reduce impacts of lighting on wildlife.

**Signage** is placed in a specific location to help with wayfinding and to ensure compliance with highways regulations, such as speed limits or Controlled Parking Zones.

**Uncontrolled formal crossings for pedestrians**, such as zebra crossings. These are situated at points of potential conflict to guide pedestrians to the safest crossing location. These crossings cannot be relocated as this would increase risks to pedestrians.

**Controlled formal crossings**, such as toucan or puffin crossings. These are located to ensure the transport network can function safely and efficiently. Relocation of a controlled formal crossing for a residential crossover would have a negative impact on the transport network.

**Bus stop cages** cannot be closer than 10m on the same side of the street from a new vehicle crossover. As the Highway Authority, the council has the right to extend this distance if the frequency of bus services or the number of queuing passengers warrants it. Relocating a bus stop cage could have a negative impact on the local transport network.

**Blue Badge bays** are located to be accessible to residents from specific properties. Relocating a Blue Badge Bay would not be acceptable due to the difficulties it may cause to Blue Badge Holders.



### **Fact box 3: Potentially moveable features**

The following list contains items that could potentially be relocated to facilitate a vehicle crossover. The costs of the relocation would be paid by the applicant seeking the crossover. These costs can be significant and may include but is not limited to the Traffic Management Order (TMO). Your application for a vehicle crossover may still be refused if the relocation of the feature would have an adverse impact on the public highway.

#### **On-street electric vehicle charging points (EVCPs)**

- May be moved within the immediate vicinity of their existing location.
- This is only in instances where the move would not have a negative impact on residents.
- Relocation would be subject to consultation during which other residents may raise objections.
- The applicant would bear all costs associated with relocating the EVCP. This would include the TMO and movement of the parking bay associated with the charger.

#### **Standard parking bays**

- Can be moved or removed where parking stress in the vicinity of the site is demonstrated to be lower than 85%.
- Relocation would be subject to consultation during which other residents may raise objections.
- The applicant would bear all costs associated with moving or removing the parking bay. This would include the TMO and the signing / lining of the relocated bay.
- The applicant may also be liable for financial compensation that covers the loss of council parking revenue.
- The council may refuse an application where the parking bay would provide valuable kerbside space for uses that benefit the wider public.

#### **On-carriageway cycle hangers**

- Can be moved only where there is an appropriate location for the replacement(s) in the vicinity of the site. Users of the hanger must also not be inconvenienced by the relocation.
- Relocation would be subject to consultation during which other residents may raise objections.
- The applicant would bear all costs associated with moving the cycle hanger. This would include the TMO.
- An agreement with the users of the existing hanger must be in place to ensure there is no loss of access or displaced cycles.

**Cycle stands on footways**

- Can be moved only where there is an appropriate location for the replacement(s) in the vicinity of the site.
- If there is no suitable location for the replacement, the council will likely refuse your application to ensure adequate cover of visitor cycle parking throughout the borough.
- The applicant would bear all costs associated with relocating the cycle stand.

**Segregated cycle lanes or tracks**

- Can be adjusted where the council deem appropriate, considering the adopted Streets for People strategy which prioritises active travel over private vehicles.
- The applicant would bear all costs associated with relocating the cycle stand. This would include a level 1 departure, a road safety audit (RSA) and TMO. This would likely be a significant expense.



#### **Fact box 4: Highway requirements for vehicle crossovers**

**Proximity to side roads** – New vehicle crossovers cannot not be located within 15m of a side road junction to the same side of the street. On classified roads (A, B and C roads) the minimum distance is 24m.

**Consecutive crossovers** – Less than 1.2m length of standard footway between crossovers, including between the proposed crossover and existing crossover(s), would be considered unacceptable. This is because frequent changes in crossfall and gradient cause difficulties for those with visual or mobility impairments.

**Cross and Long-falls** - Measured across the footway, the crossfall gradient should be between 1:30 - 1:60 (1:40 preferred). Gradients should not exceed 1/12 to ensure the safety of pedestrians and a gradient steeper than ¼ will not be permitted.

**Visibility splays** – Pedestrian sightlines of 1.5m x 1.5m are required either side of the opening in the boundary for a vehicle access from the back edge of the public highway (not within the opening). No features higher than 0.6m are permitted within this area. Vehicle sightlines of 2.4m x 25m (20mph roads) or 2.4, x 43m (30mph roads) are also required.

**Entry and exit** – On Classified roads, vehicles must be able to enter and exit in forward gear. To reduce conflict between road users, only 1 crossover per residential property will be permitted.

**Space for 2.4 x 4.8 car** – There must be at least 2.4 x 4.8m of hardstanding or permeable material per car parking space. Gates must open inwards or slide to the side within the bounds of your property. Where gates are proposed to open inwards, additional length of hardstanding is required ensure gates can open while the vehicle is parked.

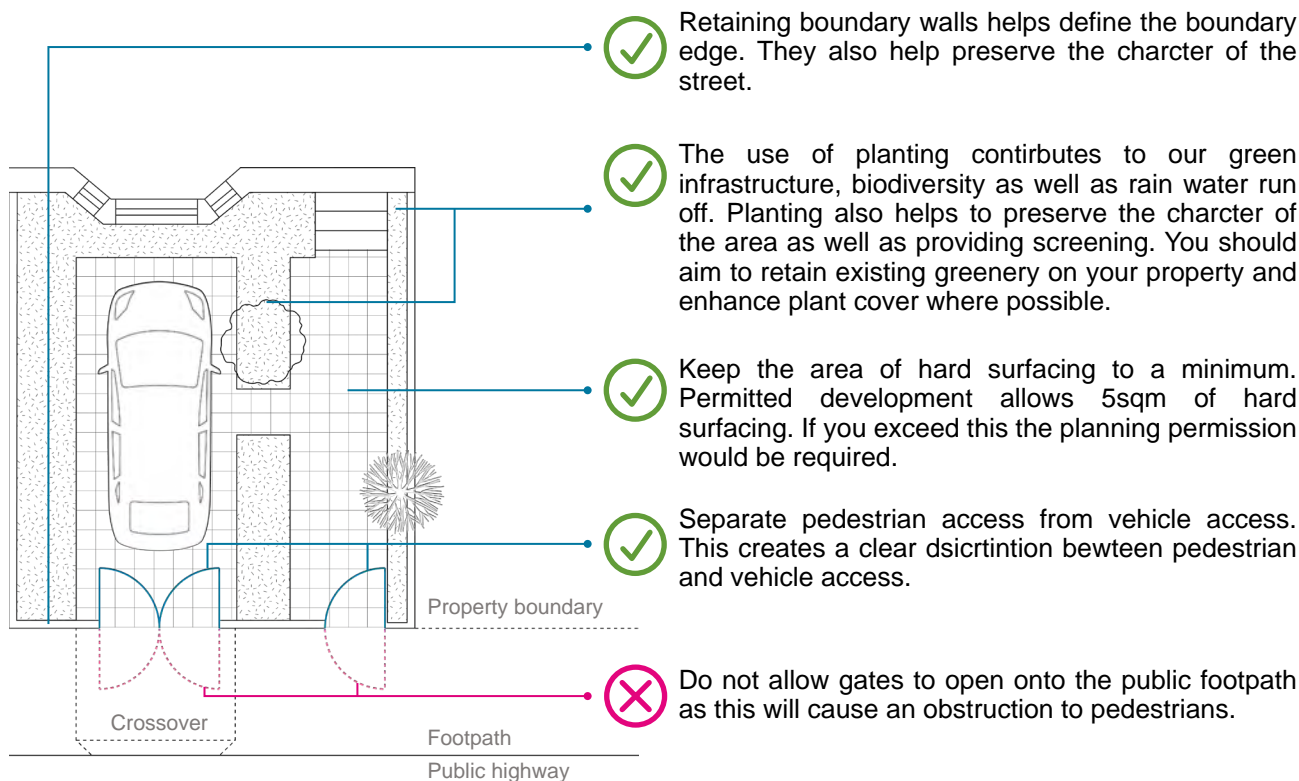


Figure 18: Best practice design guidance on vehicle crossovers

### Electric vehicle charging points

You should check whether you can have off-street parking before installing any electric vehicle charging points. For more [information on electric vehicle charging points](#) please refer to the council's website.

## 2.9 External painting

### Is permission required for external painting?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not required.	Planning permission is not required.	Planning permission is not required unless the external appearance will change significantly.	Listed Building Consent is not required unless your home is not currently painted, or the external appearance will change significantly.

Table 10: 'Is permission required for external painting?'

Regular external redecoration can help prevent decay at your home. You may also wish to repaint your home a different colour. In most cases, planning permission is not required unless the permitted development right is removed by an Article 4 Direction.

### *Conservation Areas*

We encourage the use of traditional colours when you are painting your home in a Conservation Area. There may be conventions of using brighter colours in certain areas of the borough or the use of the same colour in a terrace. You are advised to consider local approaches before planning any works, detailed in our [Conservation Area appraisals](#).

### *Listed Buildings*

Listed Building Consent is not required if you are carrying out like-for-like repainting. This means your home is already painted, and you are reapplying the same colour for regular maintenance.

Listed Building Consent will be required if you wish to paint non-painted external areas – for example brick, stone or concrete. Consent will also be required if the external appearance is changing colour – for example from cream to dark grey.

Decisions will be made on a case-by-case basis, but we generally do not support change to the exterior of a Listed Building. Painting brick, stone or concrete walls should be avoided as it could create damp issues and is considered harmful to the historic fabric. On buildings with external coatings, e.g. stucco and lime render, ‘breathable’ paint such as limewash should be used to ensure moisture in walls can evaporate.

## **2.10 Other development**

### **2.10.1 Boundary walls and fences**

Planning permission would not be required if you want to erect a wall or fence, alter or take down an existing wall or fence if you ensure that you meet the following conditions:

- At the front of the property does not exceed 1m in height from ground level
- To the rear of the property does not exceed 2m in height from ground level

Beyond this, planning permission would be required. Listed Building Consent may be required if your home is listed depending on the type of boundary wall or fence proposed to be replaced.

### **2.10.2 Decking and hardstanding**

Decking and hardstanding should be no more than 300mm/30cm above the ground and cannot cover more than 50% of the rear garden at your home.



# CHAPTER 3

# EXTENSIONS

## 3 EXTENSION

### 3.1 Introduction

This chapter sets out the works a resident can consider when looking to extend their home. Guidance is provided on the most common types of extensions for residential properties as well as other works such as roof terraces and outbuildings.

This chapter also provides guidance on any relevant planning considerations. These could include design quality, impact on neighbouring properties, and impact on heritage assets (such as Listed Buildings and Conservation Areas).

Some extensions are [permitted development](#) subject to conditions and limitations. This guidance should be read alongside the Permitted Development (Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). It is your responsibility to ensure you comply with all the legal requirements. The SPD sets out the position accurately in May 2024.

You will need professional advice before you plan an extension to your home. An architect, architectural designer, or surveyor will be able to prepare plans and advise you on the costs involved.

### 3.2 Key considerations

There may be many factors which need to be considered before planning how to extend your home. This will depend on the type of property you live in and where it is located.

#### 3.2.1 Whole Building Approach

We encourage a 'Whole Building Approach' when looking to extend your home. Planning an extension is a useful opportunity to consider where improvements could be made to your existing home. This could help improve your home's overall energy and thermal performance.

You should consider how your extension plans work with any future ideas for other improvement works. This could be insulating your home, installing heat pumps or solar panels. It would be useful to have an idea of these works so you can future proof your extension plans. Guidance on these works is set out in Chapter 2.

We also encourage energy efficient design and construction. Ways to reduce the carbon

emissions of your extension are best considered at the start of the design process. This could include the use of sustainable materials, green roofs or potential for natural cooling or heating in the extension. You should think about the lifespan of the materials you are using and whether they can be repaired, replaced or recycled in future.

**Figure 19** below demonstrates a Whole Building Approach to extending your home. The approach shows which parts of your home to consider first and how to think about the design and construction of your extension. This can also help make your home more resilient to the effects of a changing climate.

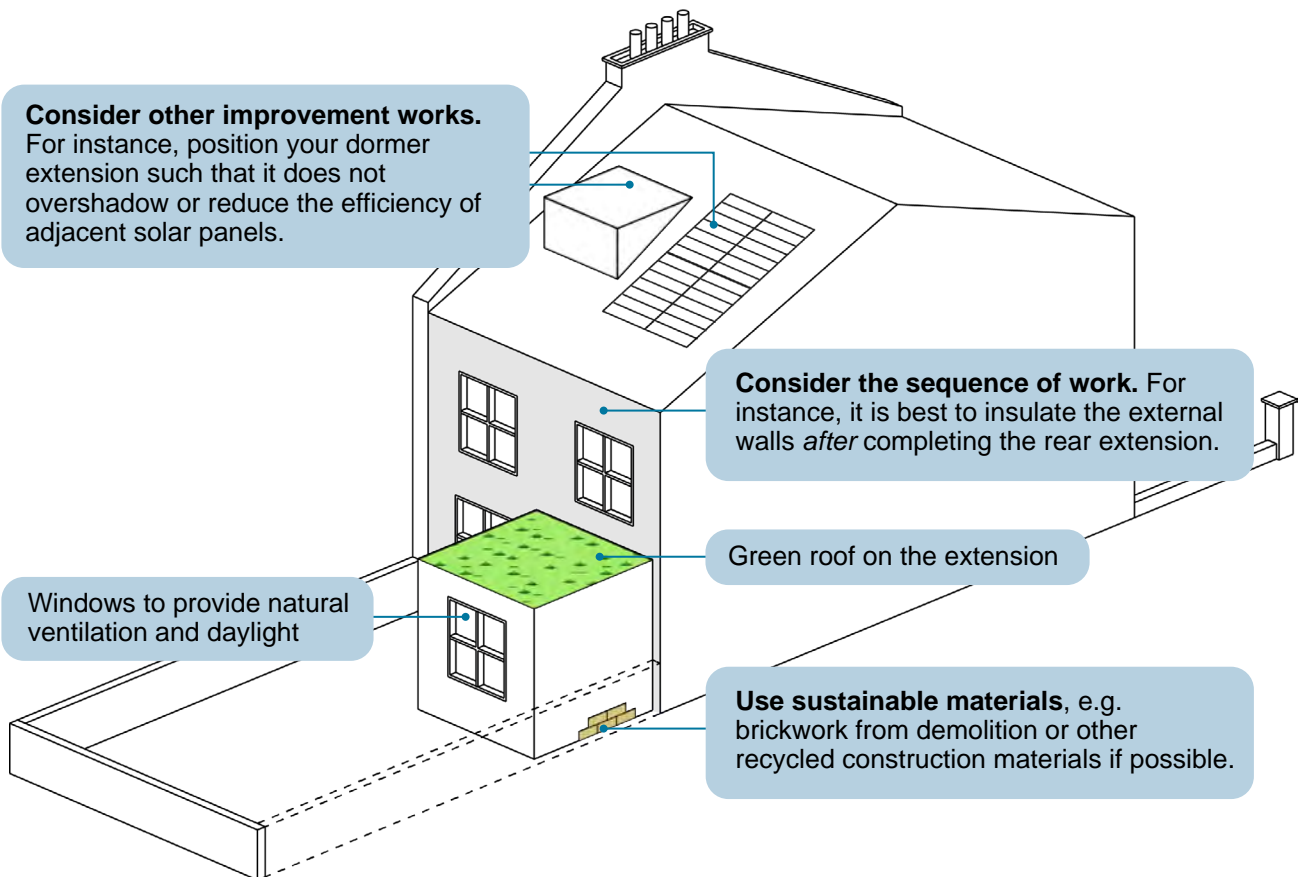


Figure 19: Whole building approach for extensions

### 3.2.2 Design and appearance

There are many different types of homes in Southwark which show the rich and varied architecture in the borough. Each type of home has its own distinctive features which define its character and style. Whether it a house, a flat, a historic or modern building, features such as windows, doors, the roof or other materials will contribute to a home's appearance.

An efficient and cost-effective extension can work in harmony with your existing home and provide more space where you need it. An extension can also be designed to bring more light and air into your home, providing a better connection to the outdoors.

You should not only consider the type of extension you want but how the extension will relate to your property, as well as the surrounding area.

An extension should:

- Be in keeping with the architectural style of your home
- Be of a size and scale that would not visually dominate your home
- Use materials that are similar to your home
- Be in keeping with the character of the surrounding area, including any historic pattern
- Avoid impact to the amenity of neighbouring properties
- Prioritise energy efficient design and climate resilient construction where practical

### 3.2.3 Internal space standards

There are no minimum area standards for internal spaces within a residential extension. These only apply to the creation of new dwellings.

Nonetheless, we encourage you to follow the room areas outlined in [table 11](#). This will ensure your home remains enjoyable and liveable, with a high quality of accommodation.

Dwelling size	Studio	1 bed	2 bed	3 bed	4 bed
Double bedroom	N/A	12	12	12	12
Single room	N/A		7	7	7
Living room (where eating area is in the lounge)	N/A	16	17	18	19
Kitchen (where eating area is in the lounge)	N/A	6	7	8	8
Kitchen diner (where eating area is in the kitchen)	N/A	9	11	11	12
Living room (where eating area is in the kitchen diner)	N/A	13	13	15	15
Open plan development (where kitchen/diner is combined with the living room)	N/A	24	27	30	N/A
Bathroom/WC (combined)	3.5	3.5	3.5	3.5	3.5

Table 11: Minimum room areas recommended in square metres

### 3.2.4 Heritage assets

Additional consideration will need to be given if your home is listed or within a Conservation Area. An extension should be of a high-quality design and be sympathetic to your home.

Your extension can be of a modern design, but the use of traditional materials is still encouraged. This includes materials such as brick, slate or timber. These materials will help reference the historic character of your home or the surrounding area. Traditional materials also tend to last longer than modern substitutes, giving better value and being more sustainable over time.

UPVC (Unplasticized Polyvinyl Chloride) will not be permitted in any of our Listed Buildings or Conservation Areas, even to the rear of a property. UPVC generally appears out of place in historic buildings or areas, owing to the plastic appearance. UPVC may also weather or behave differently from natural and more traditional materials.

### *Conservation Areas*

You should read the [Conservation Area appraisal](#) for your area before planning any works. This sets out the type of materials you should use and the common types of developments for your area.

### *Listed Buildings*

The external appearance of a Listed Building is often of great importance and significance. Any extension should be sympathetic and subservient to your home, and not detract from its external appearance or its historic features.

You will need to consider any historic features of your home, such as whether you have an outrigger or butterfly roof. This may dictate the type of extensions which are possible. We will resist the loss of butterfly roofs and other prominent historic features.

The internal walls and plan form are also very important and reflect the domestic history of a home. These are often not referenced in Listed Building descriptions but are protected by the listed status of the property. You will need to consider the amount of building fabric which needs to be removed to build an extension. This includes any windows, doors, internal walls or chimney breasts. The removal of these features will be considered under the Listed Building Consent.

We will not permit the removal of internal walls where it results in the loss of the original plan form of your home. This means we will not generally allow the whole removal of internal walls to create an open plan living room / kitchen / dining room. We may allow partial removal of walls where there is a retention of wall nibs and down stands. This allows the original plan form to still be legible whilst opening the room up. The loss of other original features such as chimney breasts will also be resisted.

You will also need to check whether your home is listed as part of a group of buildings. If so, you will need to consider the impact any works would have on the significance of the wider listed group. You can find out whether your home is group listed in the Listed Building description. The description will refer to your property's address on its own or part of a wider group. Even if your home is not group listed, it is worth having consideration to any other Listed Buildings in the vicinity of your property.

### 3.2.5 Trees

You must consider how the any planned extension may impact any nearby trees. This not only includes trees on your property but also those nearby in neighbouring properties. Extensions which involve works to the ground may cause harm to the root protection area of a tree or a tree may have to be removed to clear space for the work. The root protection area of a tree (RPA) is calculated at 12 x the diameter of the tree, measured at 1.5m from the ground. For example, a 300mm diameter tree will have an RPA radius of 3.6m from the bole of the tree, expressed as a circle. This is demonstrated in [Figure 20](#).

If you are pruning, removing or carrying out works that may affect trees (including excavation) you will need to submit a Tree survey or Arboricultural Impacts Assessment as part of your planning application. More information on the assessment can be found [here](#).

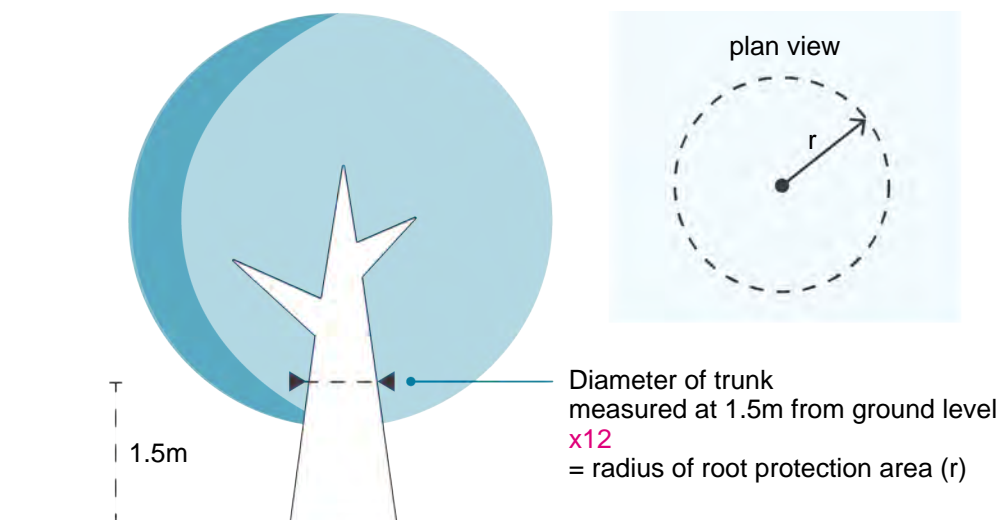


Figure 20: Root protection area of a tree

### 3.2.6 Impact to neighbouring properties

You must ensure any proposed extension does not negatively impact on your neighbour's ability to enjoy their home.

There are three main factors which are used to assess whether a neighbour is adversely affected:

- **Daylight and Sunlight:** Proposed works should not cause unacceptable harm the amount of daylight or sunlight your neighbour has access to.
- **Privacy:** Proposed works should protect the privacy for your neighbour
- **Loss of Outlook:** Proposed works should not unacceptably harm outlook for neighbours.

## Daylight and sunlight tests

We carry out two daylight and sunlight tests when assessing a planning application for an extension. This is to ensure the extension does not cause unacceptable harm to the daylight or sunlight your neighbour has access to.

These tests are the 45-degree rule and 25-degree rule. It is recommended that you carry out these tests before submitting your plans to ensure the extension is compliant.

### 45-degree rule

We use this test should where the proposed development is at right angles to the affected window of the neighbouring property:

- Draw a line at 45 degrees upwards from the centre of the affected window
- Draw a line at 45 degrees sideways from the centre of the affected window

This test is demonstrated in [Figure 21](#) below.

If the proposed development is both higher and wider than these 45-degree lines, there may be an unacceptable loss of daylight to the affected window.

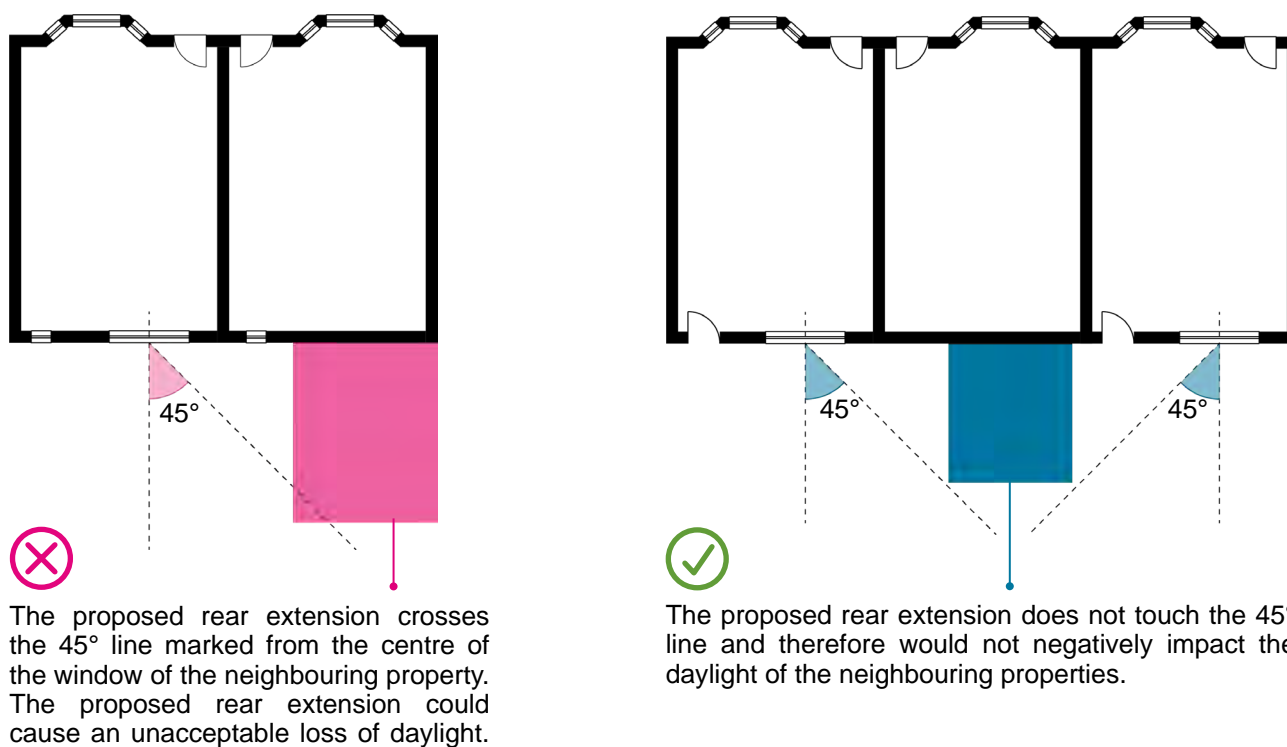


Figure 21: 45-degree rule



### 25-degree rule

We use this test where the proposed extension faces the affected window of the neighbouring property:

- Draw a line at 25 degrees upwards from the centre of the affected window

If the proposed extension is higher than this 25-degree line, there may be an unacceptable loss of daylight to the affected window.

This test is demonstrated in [Figure 22](#) below.

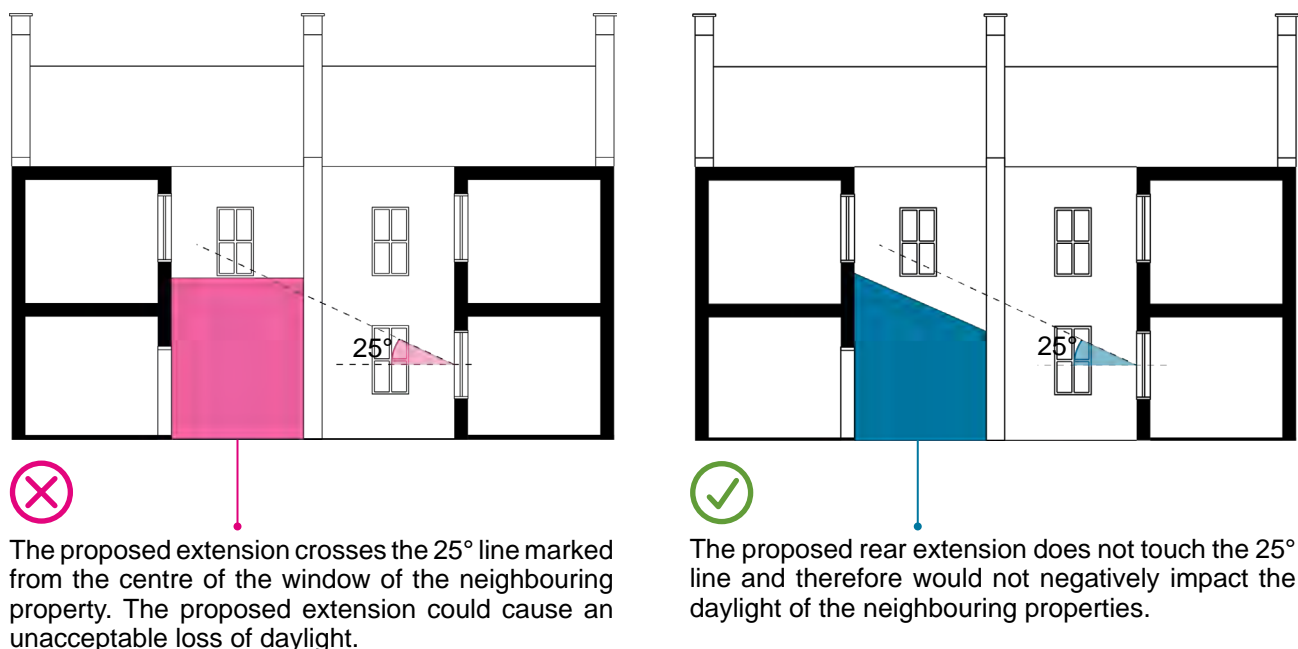


Figure 22: 25-degree rule

### 3.2.7 Party walls

A party wall is a wall shared by two adjoining properties. Depending on the type of home you live in, you may share may have party walls with more than one neighbour. The Party Wall Act 1996 is in place to control development on each side of a party wall and maintain its integrity and function.

Certain works may need a Party Wall Agreement with your neighbour(s). This is separate from any planning permission you may receive.

### 3.3 Front extensions

#### Is permission required for a front extension?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Permitted development applies within certain dimensions. Above this, Planning Permission will be required.	Planning Permission will be required.	Planning Permission will be required.	Listed Building Consent and Planning Permission will be required.

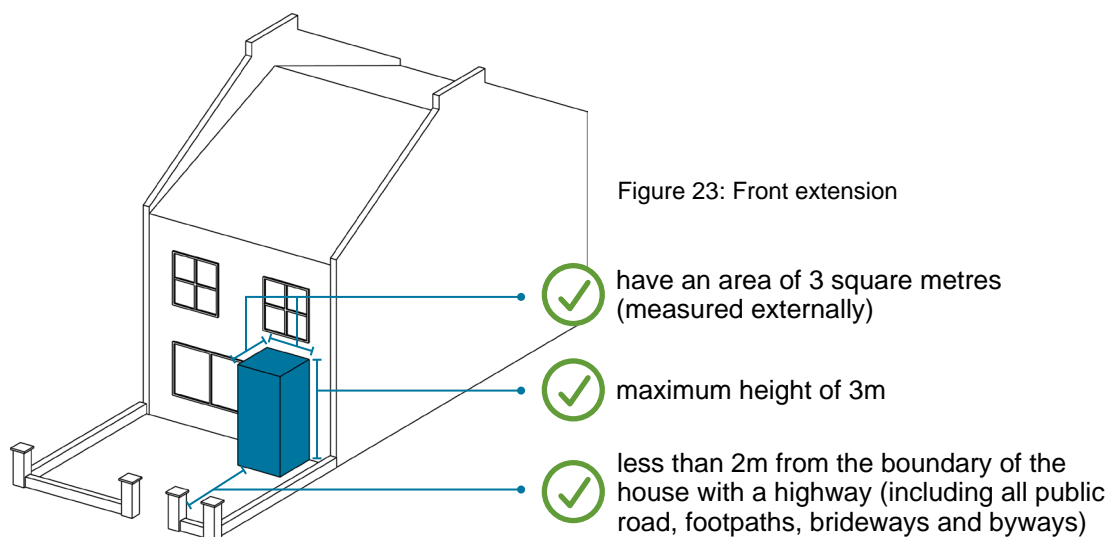
Table 12: 'Is permission required for a front extension?'

Front extensions are generally limited to porches for most properties within the borough. Permitted development allows for the construction of a front porch to a maximum of 3sqm in area and 3m in height. This is shown in [Figure 23](#) below.

Beyond these dimensions, you will need planning permission. Planning permission is also required for front extensions if your home is a flat / maisonette or within a Conservation Area. It is also needed alongside Listed Building Consent for listed homes.

We do not encourage front extensions which exceed these permitted development dimensions as the extension would likely be too visible in the existing street scene. Overly large front extensions can impact the character and appearance of your home.

It is also important to maintain the established building line in your street. This ensures a consistency to the area. Front extensions will not be permitted where this building line is significantly disrupted. This would result in a discordant feature within the streetscape.



### 3.4 Side extensions

#### Is permission required for a side extension?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Permitted development applies within certain dimensions. Above this, Planning Permission will be required.	Planning Permission will be required.	Planning Permission will be required.	Listed Building Consent and Planning Permission will be required.

Table 13: 'Is permission required for a side extension?'

Side extensions are commonly found at detached and semi-detached properties as well as the end of terraces. Consideration needs to be given when planning a side extension to maintain the sense of openness between buildings. This is important for maintaining the character of the existing street scene. It also reduces the sense of enclosure in the area.

Side extensions should be subservient to the existing building and not be a dominating feature. This is especially important if your home is listed or within a Conservation Area.

### 3.4.1 Single storey side extension(s)

Permitted development allows a single storey side extensions with a maximum height of 4m. The width should be no more than half the width of your home.

Beyond these dimensions, you will need planning permission. Planning permission is also required for front extensions if your home is a flat / maisonette or within a Conservation Area. It is also needed alongside Listed Building Consent for listed homes.

Where planning permission is required, side extensions should still be kept to a single storey. The extension should also be set back from the street-facing façade of the property by 1.5m. This will ensure the important gaps and sense of openness between properties are maintained.

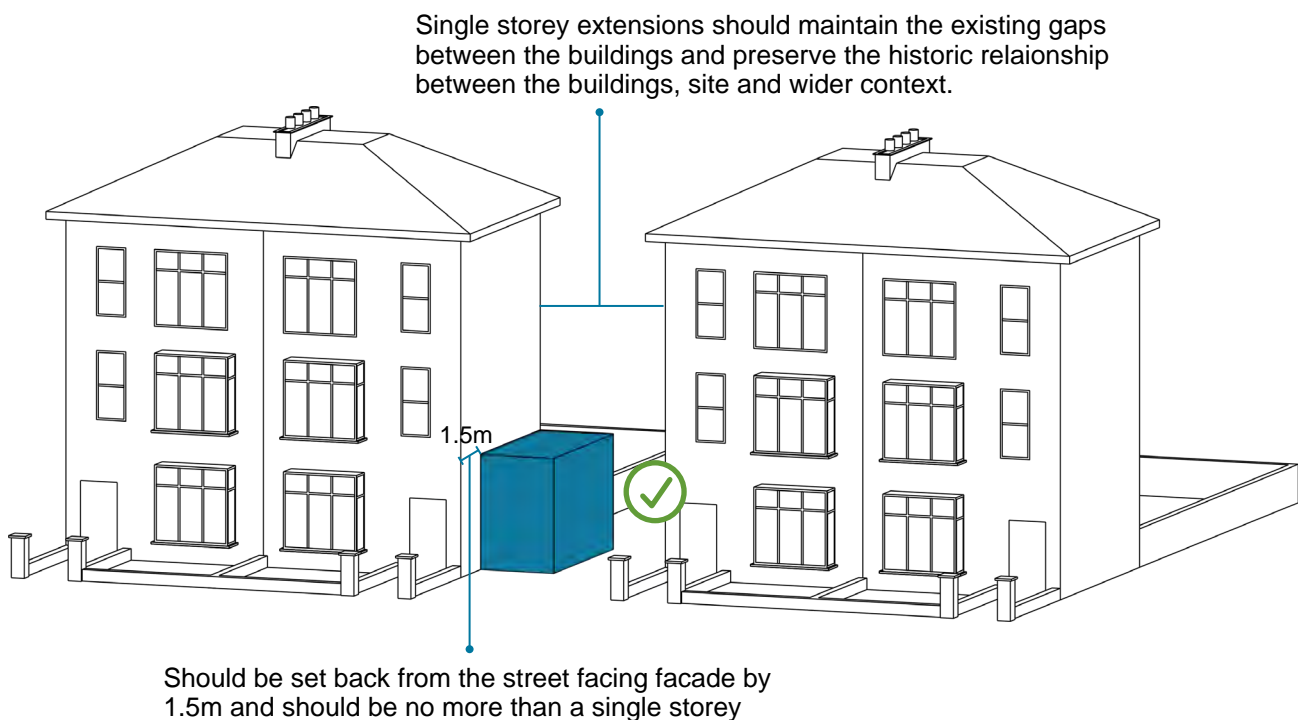


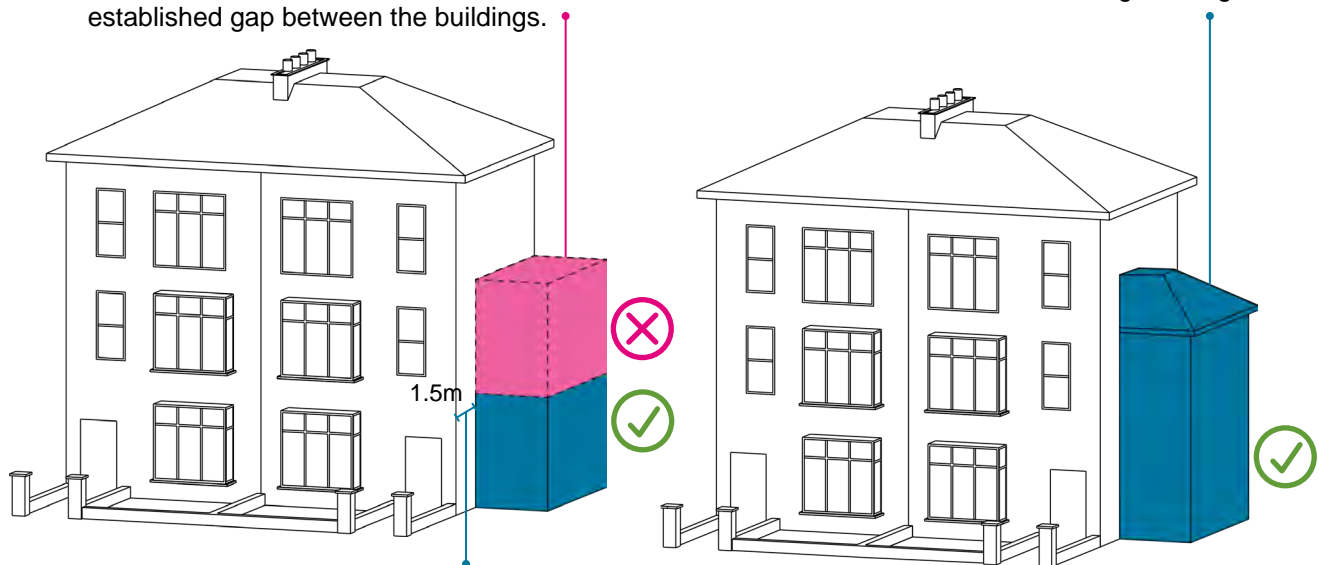
Figure 24: Single storey side extension

### 3.4.2 Two Storey Side Extension(s)

Two storey side extensions are not encouraged. The two-storey height is likely to have an impact on the character and setting of the street. Two storey side extensions must be designed to avoid a terracing effect, or the loss of the open character between properties. The extension should also be proposed with a roof style to match the existing property, as set out in [Figure 25](#).

For houses in conservation areas and listed buildings, it is important to maintain the gaps between buildings. Two storey side extensions fail to maintain the established gap between the buildings.

For houses outside conservation areas and that are not listed, when a two storey side extension is proposed, the roof form should match that of the existing building.



Should be set back from the street facing facade by 1.5m and should be no more than a single storey

Figure 25: Two storey side extension

## 3.5 Rear extensions

### Is permission required for a rear extension?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Permitted development applies within certain dimensions. Above this, Planning Permission will be required.	Planning Permission will be required.	Planning Permission will be required.	Listed Building Consent and Planning Permission will be required.

Table 14: 'Is permission required for a rear extension?'

Rear extensions are suitable for most housing types whether terraced, semi-detached or detached. Rear extensions should be designed to respect the character and scale of your existing home and are encouraged to be kept to a single storey.

You need to consider any change in ground levels between your home and any adjoining neighbours. This may result in the height of your extension appearing taller at these boundaries.

You will also need to ensure any extension does not cause unacceptable harm to the amenity of your neighbours. This guidance is set out in more detail in [section 3.2.6](#).

### 3.5.1 Permitted development rear extensions

Permitted development allows for some homes to build a single storey rear extension without planning permission.

This is not applicable to homes which are flats, maisonettes, in a Conservation Area or listed.

#### *Terraced and semi-detached house*

A terraced or semi-detached home can be extended to the rear by up to 3m in depth and a maximum height of 4m (maximum height at the eaves of 3m), as set out in [Figures 26 and 27](#).

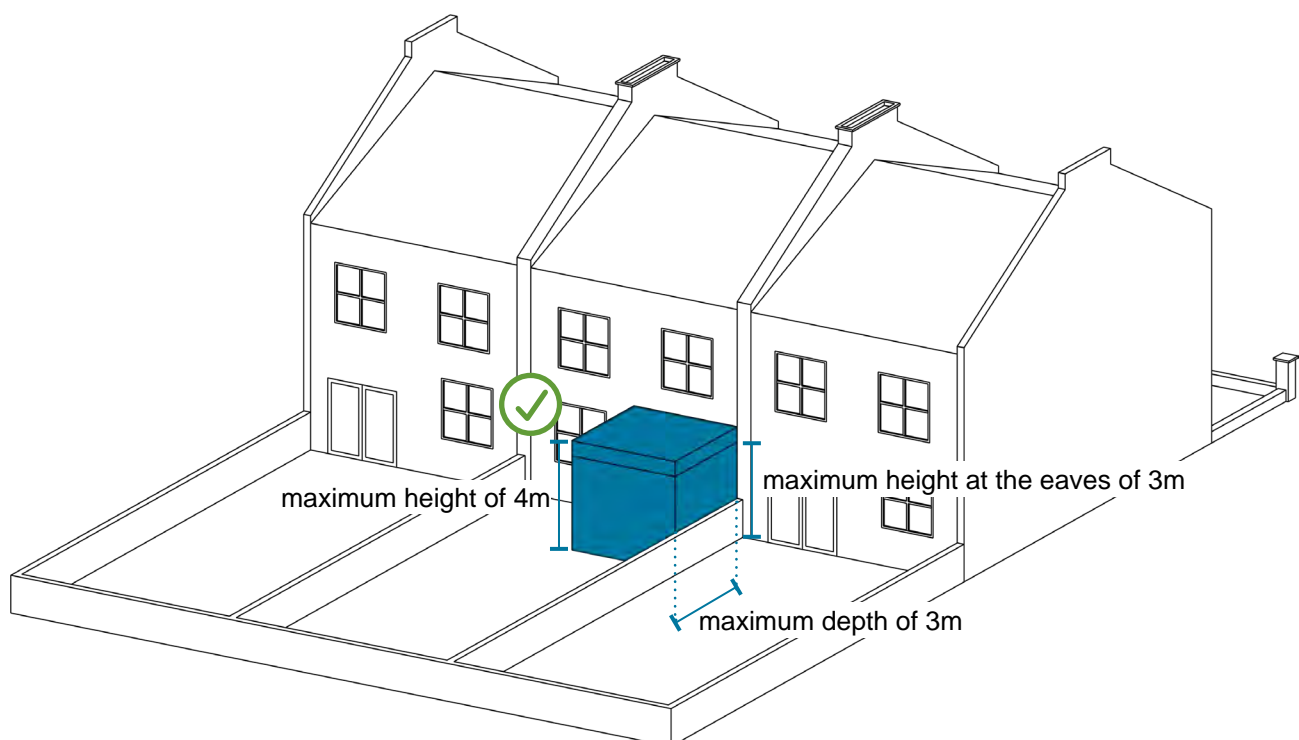


Figure 26: Rear extension at a terraced house

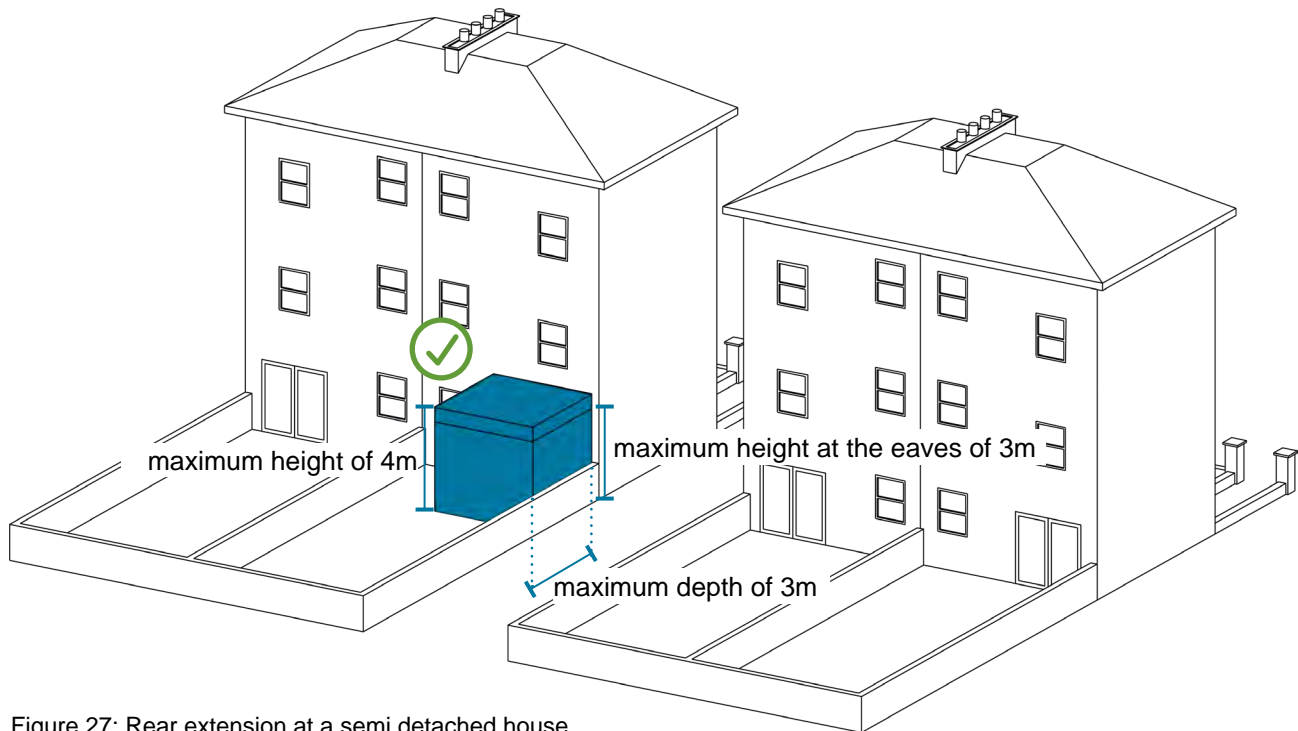


Figure 27: Rear extension at a semi detached house

### *Detached house*

A detached house can be extended to the rear by up to 4m in depth with a maximum height of 4m (maximum height at the eaves of 3m) as set out in [Figure 28](#).

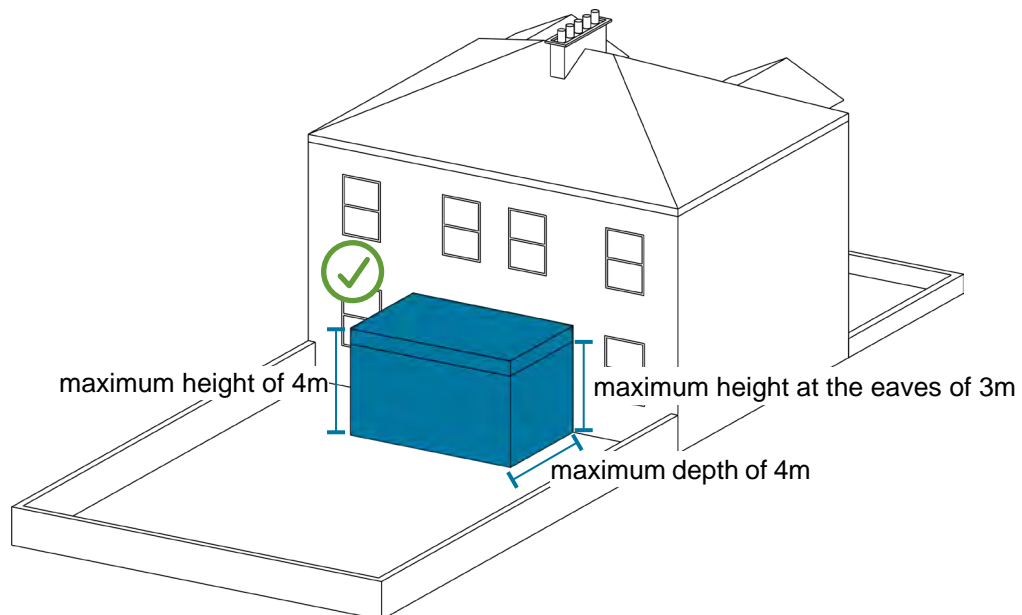


Figure 28: Rear extension at a detached house

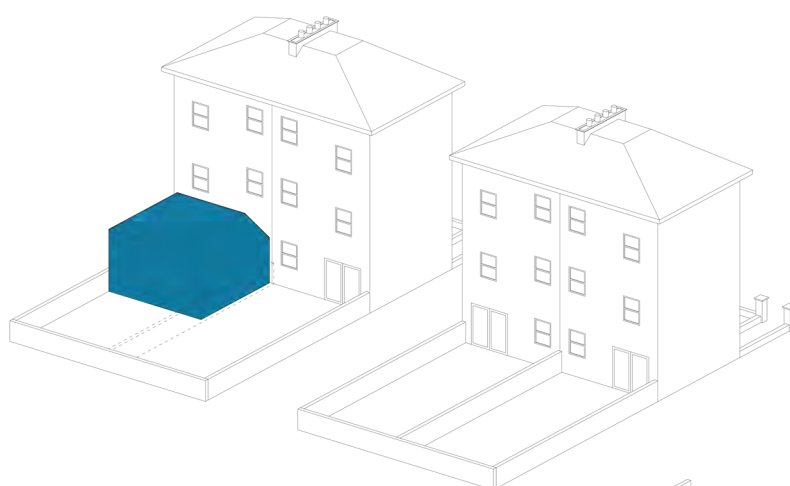
### 3.5.2 Rear extensions requiring planning permission

Beyond permitted development, you will need planning permission. Planning permission is also required for rear extensions if your home is a flat/ maisonette or within a Conservation Area. It is also needed alongside Listed Building Consent for listed homes.

Extensions between 3m-6m in depth need to consider the impact that may be caused to any neighbours, especially if the extension is on the boundary wall. We also encourage the roof to be designed to slope down towards the neighbouring property and to remain below 2.4m at this boundary for the entire length of the extension.

Extensions which exceed 6m in depth on the boundary are likely to be refused. These generally lead to an increased sense of enclosure at neighbouring properties, also reducing their access to daylight and sunlight.

Rear extensions must also not take up more than 50% of the total rear garden space at your home.



Recommended dimensions of rear extensions needing planning permission:

- maximum height of 4m
- depth below 6m
- maximum height of sloped down part 2.4m

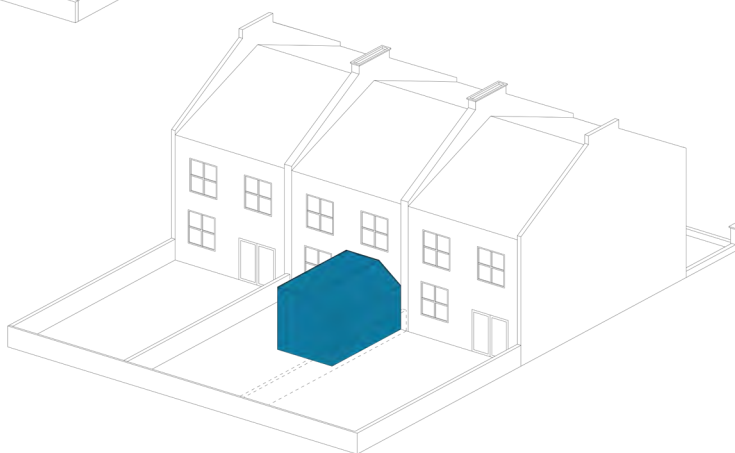


Figure 29: Rear extensions requiring planning permission



### 3.5.3 L-shaped or wrap around extensions

If your home includes an outrigger to the rear, as many traditional buildings in Southwark do, you may find the most appropriate solution is a L-shaped or wrap-around extension, as set out in [Figure 31](#).

Outriggers generally have a window at the rear and care should be taken to ensure any proposed extension does not close off this source of light. A courtyard may need to be created within the extension to avoid blocking light to a room and to allow ventilation, as set out in [Figure 31](#).

Wrap around extensions should remain no deeper than 6m on the boundary and stay below 2.4m at the eaves. The extension must also not take up more than 50% of the total rear garden space at your home.

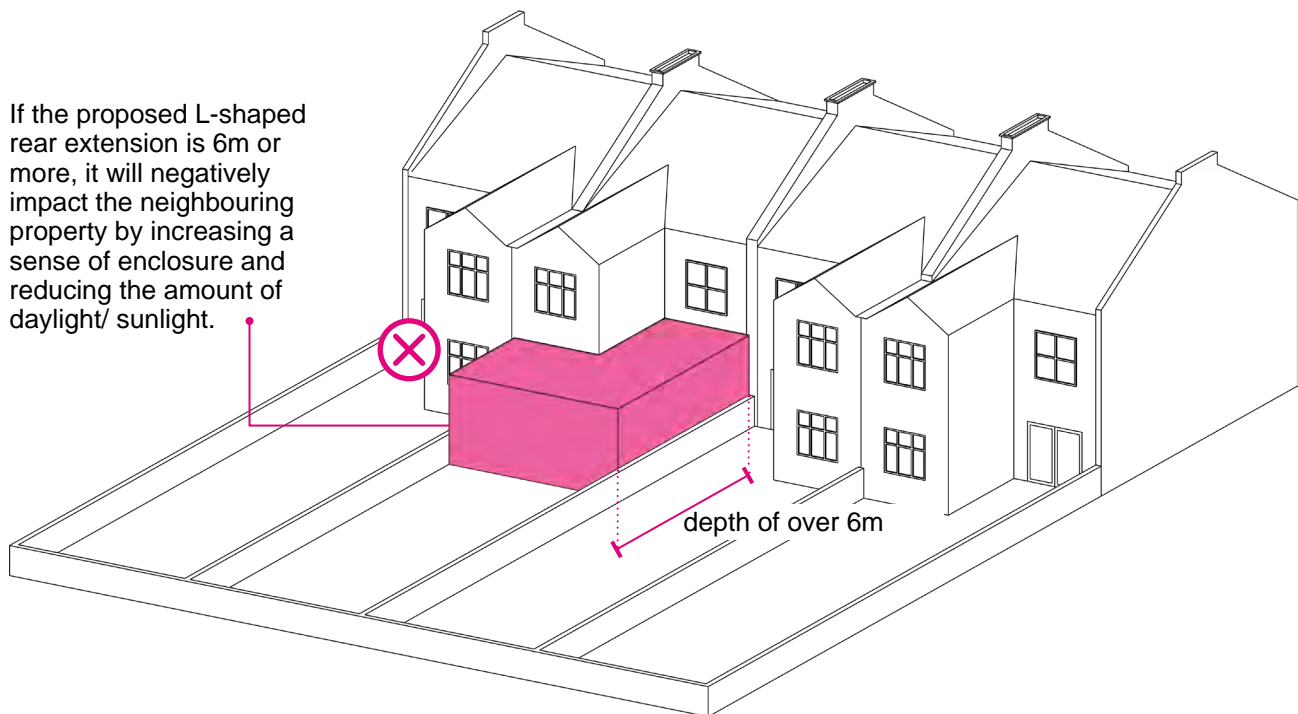


Figure 30: L-shaped or wrap around extension - poor example

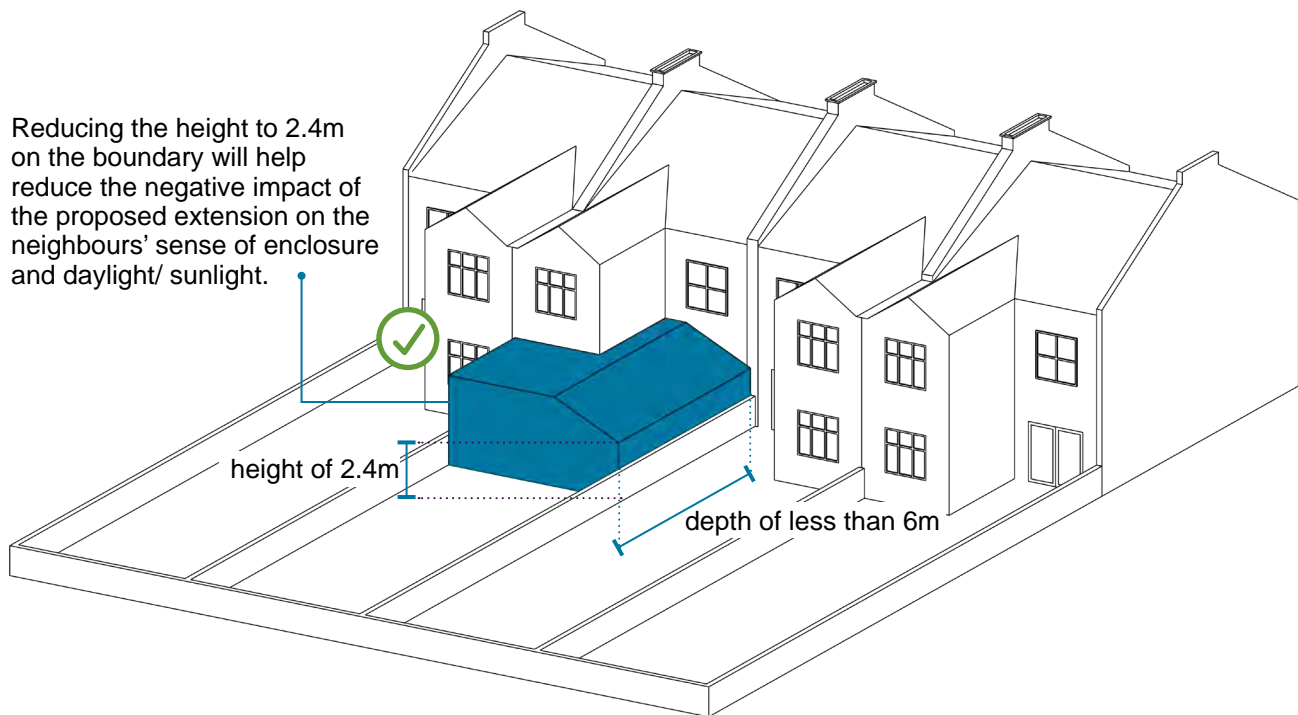


Figure 31: L-shaped or wrap around extension - good example

### 3.6 Roof extensions

#### Is permission required for a roof extension?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Permitted development applies within certain dimensions and roof works. Beyond this, Planning Permission will be required.	Planning Permission will be required.	Planning Permission will be required.	Listed Building Consent and Planning Permission will be required.

Table 15: 'Is permission required for a roof extension?'

Additional space can also be created at your home by extending your existing roof. There are two main types of roof extensions; mansard and dormer. You can also extend your roof by raising the ridge. Any extension which exceeds the highest part of the roof at your home will require planning permission. Roof extensions should remain subservient in scale to your existing home and not appear as a dominating feature.

### 3.6.1 Permitted development rear dormers

Permitted development allows you to extend your roof with a dormer up to 40 cubic m if a terraced property and 50 cubic m if it's a semi-detached or detached property. This is not applicable to homes which are flats, maisonettes, in a Conservation Area or listed.

The dormer extension should not be on the street facing roof slope and should not be taller than the highest part of the roof which is generally the ridge. It should be set back, as far as is practicable, at least 20cm from the original eaves. The 20cm distance is measured along the roof plane. The roof enlargement also cannot overhang the outer face of the wall of the original house.

### 3.6.2 Rear dormers requiring planning permission

Beyond permitted development, you will need planning permission. Planning permission is also required for rear extensions if your home is a flat / maisonette or within a Conservation Area. It is also needed alongside Listed Building Consent for listed homes.

Dormer extensions should sit within the existing roof and should not dominate the existing roof form.

Rear dormers should also be:

- symmetrically located
- at least 0.5m below the ridge of the roof
- 1m above the eaves
- set in 1m from shared boundary and from the edge of the roof.

Overly large or box dormers will not be permitted in Conservation Areas or for Listed Buildings. These are not seen as sympathetic to the historic character of these homes.

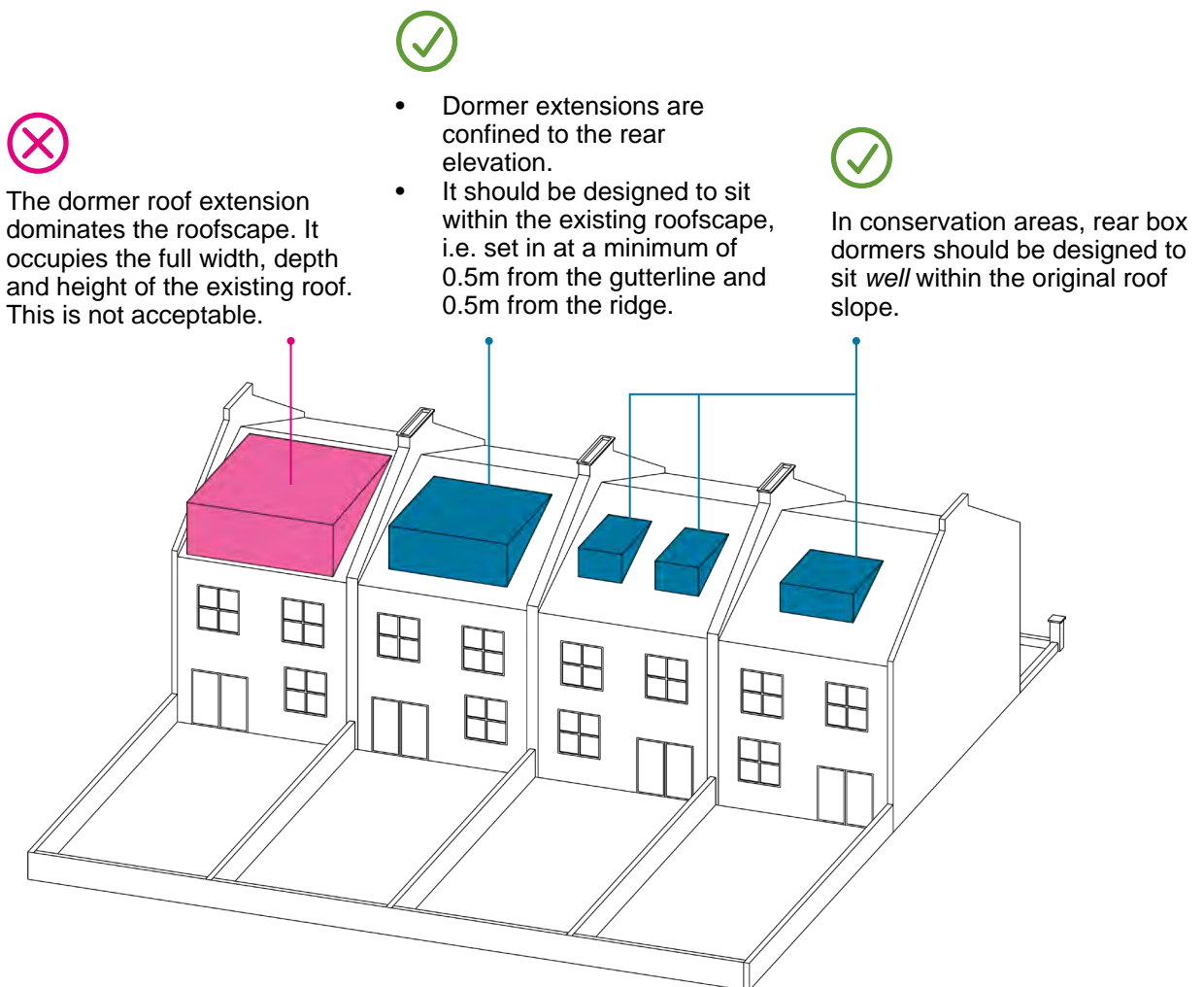


Figure 32: Rear dormers

### 3.6.3 Side dormers

Side dormers are not encouraged, unless they are an original or common feature of properties in that street. Side dormers should sit within the slope of the roof, well clear of any hips and verges.

### 3.6.4 Mansard extensions

All mansard extensions will require planning permission.

Mansard extensions should be designed to sit behind the front and rear parapet and should be at a maximum angle of 70 degrees. If your home is located on a street corner, the mansard should return to match the parapet. Mansard extensions will not be permitted if extending onto an outrigger.

A mansard extension will also not be permitted if disrupting the consistency of surrounding roof forms. For example, a mansard extension would not be permitted where there is an unbroken run of butterfly roofs, as set out in [Figure 34](#).

Windows should follow the alignment and design of the existing windows on the upper floors of the house at the front and rear and should be designed as discrete dormer windows set within the roof-slope.

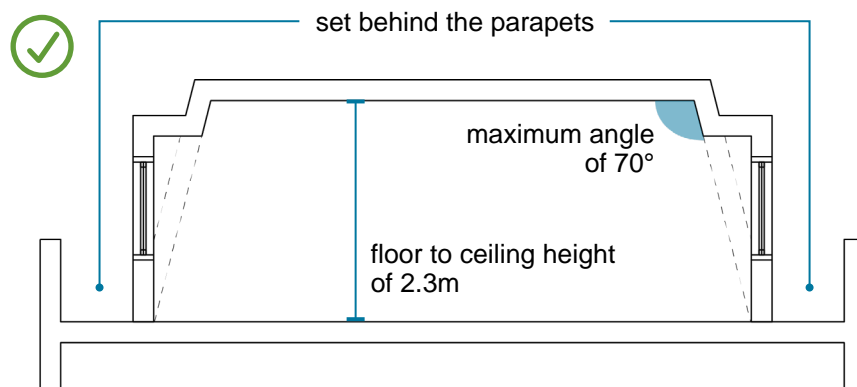


Figure 33: Mansard extension - good example

Where there is a terrace of an unbroken run of butterfly roofs, alteration to the roofscape to create a mansard extension will not be supported.

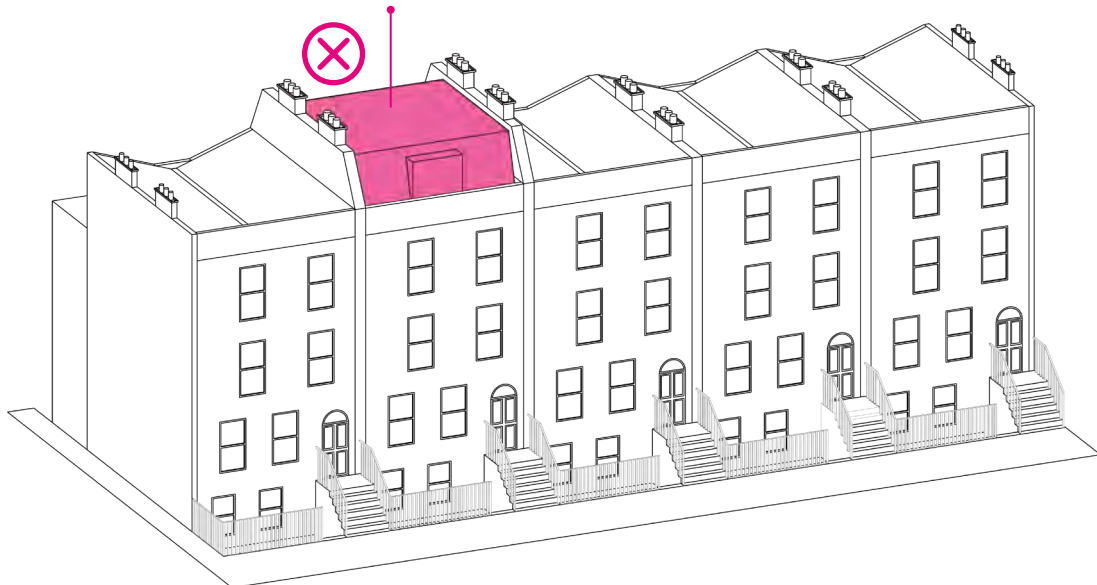


Figure 34: Mansard extension in an unbroken run of butterfly roofs - bad example

### 3.6.5 Ridge raises

Raising the roof ridge at your home will require planning permission. Listed Building Consent would also be required if your home is listed.

The ridge is the highest part of the roof and the line running the length of the roof, where the two roof slopes meet.

Ridge raises should be designed so that the slope of the front/street facing roof remains the same, as illustrated in **Figure 35**. To raise the ridge the front roof slope should be extended upwards, by no more than 300-400mm, with the gradient unaltered. The ridge raise should be accommodated within any roof chimneys and not visible beyond this. The ridge raise should also use like-for-like materials with the existing roof.

This is to ensure the ridge raise does not change the appearance of the roof from the street, and consistent rooflines are maintained in the area. This is especially important where there is a strong uniformity in roof forms or for homes which are listed or within Conservation Areas.

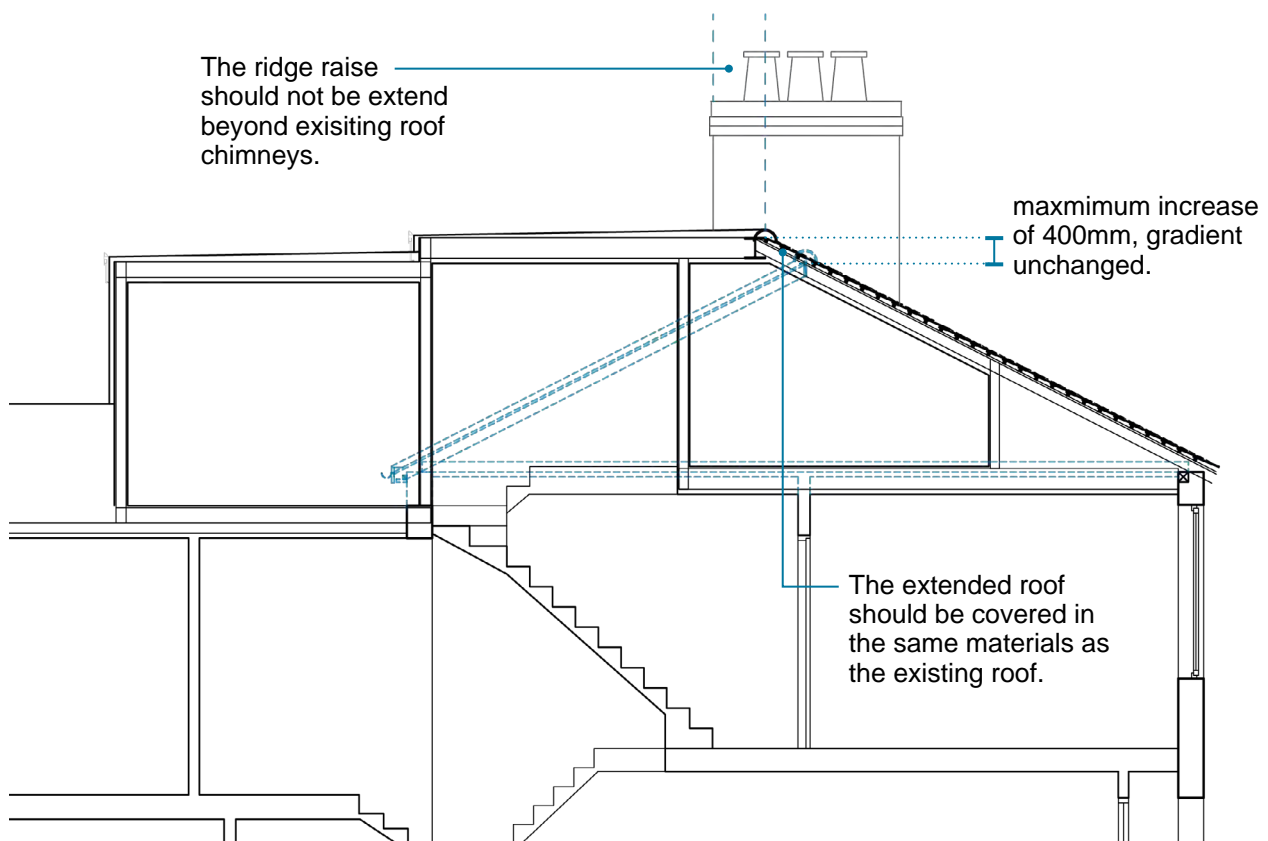


Figure 35: Ridge raise

### 3.6.6 Rooflights

Rooflights are a useful way to bring light and ventilation into your home and can have make a loft space more habitable.

Permitted development allows householders to install rooflights on street-facing roof slopes provided they are not more than 0.15m above the roof plane.

The size and number of rooflights should not dominate the existing roof. Rooflights are encouraged to be installed with a neat arrangement.

Within Conservation Areas, rooflights should sit flush with the roof slope and should not extend beyond the roof slope. Conservation style rooflights are also required to be used.

### 3.6.7 Terraces

Terraces can provide valuable amenity space, especially for flats that would otherwise have little or no private outside space. You need to consider the impact of a roof terrace on the amenity of your neighbours. Terraces can generate harmful noise disturbance and issues of overlooking to your neighbours when in use. The terrace should be setback to reduce the impact on your neighbours.

Where terraces allow for direct views into neighbouring properties, privacy screening should be used. Privacy screening should be no less than 1.8m in height. Perforated screening is preferred, but obscured glazing can also be used.

If proposing a balcony to sit within the existing roof, the existing parapet should be maintained, and any required screening should sit behind.

- Roof terraces should be designed to ensure they do not negatively affect daylight/ sunlight or privacy by way of overseeing neighbouring properties.
- They should be set back by at least 1.5m from the rear elevation and 1m from the side edges.
- A screening would be required to help restrict views out to preserve the amenity of the neighbouring properties. The proposed screening would need to be 1.8m in height

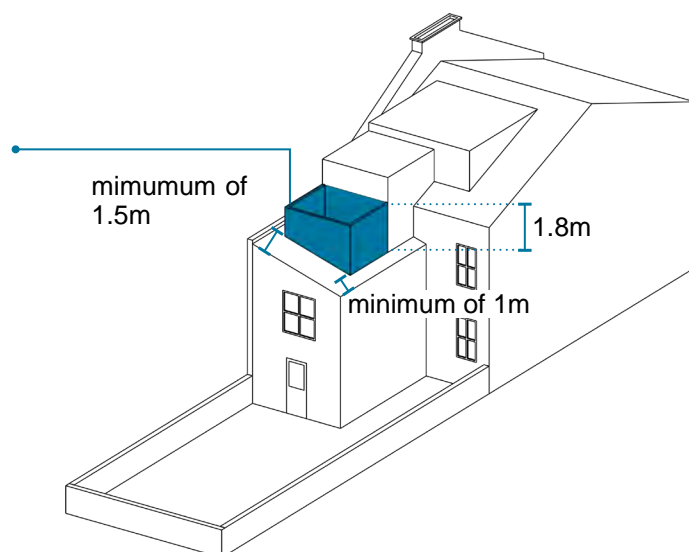


Figure 36: Roof terrace

### 3.7 Garden rooms and outbuildings

#### Is permission required for a garden room or outbuilding?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Permitted development applies within certain dimensions and roof works. Beyond this, Planning Permission will be required.	Planning Permission will be required.	Planning Permission will be required.	Listed Building Consent and Planning Permission will be required.

Table 16: 'Is permission required for a garden room or outbuilding?'

Garden rooms and outbuildings can provide useful additional space for your home. Within certain limitations permitted development will allow the installation of a garden room without requiring planning permission.

Where planning permission is required, we encourage garden rooms to have a depth of 3m, width of 5m, height of 4m with a height of 2.5m at the eaves at the maximum. This is to ensure that garden rooms remain subservient to the main building. The outbuilding also needs to be set in from the boundaries of neighbouring properties by 2m.

Garden rooms must also not take up more than 50% of the total rear garden space at your home.

Garden rooms should be designed as ancillary spaces to enhance the enjoyment of your home, and not create a new dwelling. This means the garden room should be accessed from within your existing garden, and not from a separate entrance. There should also be minimal plumbing or other services to the garden room. We may impose a planning condition or require a legal agreement to limit the use of any garden room in line with this.

Consideration also needs to be given to the impact a garden room may have on existing trees or root areas.

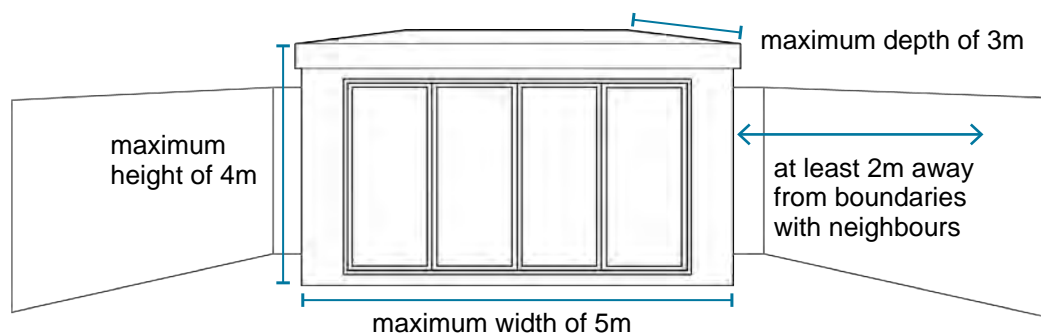


Figure 37:  
Garden room or  
outbuilding



### 3.8 Basement extensions

#### Is permission required for a basement extension?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning Permission will be required.	Planning Permission will be required.	Planning Permission will be required.	Listed Building Consent and Planning Permission will be required.

Table 17: 'Is permission required for a basement extension?'

Basement extensions create an opportunity to increase the footprint of your home. Planning permission is required for all homes to create a new or extend an existing basement. Listed Building Consent would also be required if your home is listed.

A Basement Impact Assessment (BIA) will need to be submitted alongside your application. The purpose of a BIA is to assess the impact of the development on your home, your neighbours and the environment.

You will need to submit a Flood Risk Assessment alongside your application if your home is located within a flood risk area. An Archaeological Assessment will also be required for homes within Archaeological Priority Areas and Sites of Archaeological Importance. You can check if your home is within any of these areas on Southwark Maps.

Basement extensions should not extend into or underneath the rear garden, from the principal rear wall to a depth of more than 50% of the garden. The extension should not extend to the front of the property to a depth of more than 30%. Basement extensions are also limited to no more than a single storey below ground.

Basement extensions should not dominate or result in an unacceptable loss of garden area at your home. You will also need to consider the existing trees at your home and your neighbours.

Basement rooms are encouraged for storage or utility rooms. Habitable rooms (such as living rooms or bedrooms) will only be permitted where it can be demonstrated there is sufficient access to light and ventilation and no flood risk.

### 3.8.1 Lightwells

Lightwells are common elements that form part of basements. Lightwells can allow better light and outlook into basements which would otherwise be of poor quality.

A Lightwell will only be permitted where already a common feature in a street or area. Lightwells may be discreetly located to the rear of the property as this would not be visible from the public domain.

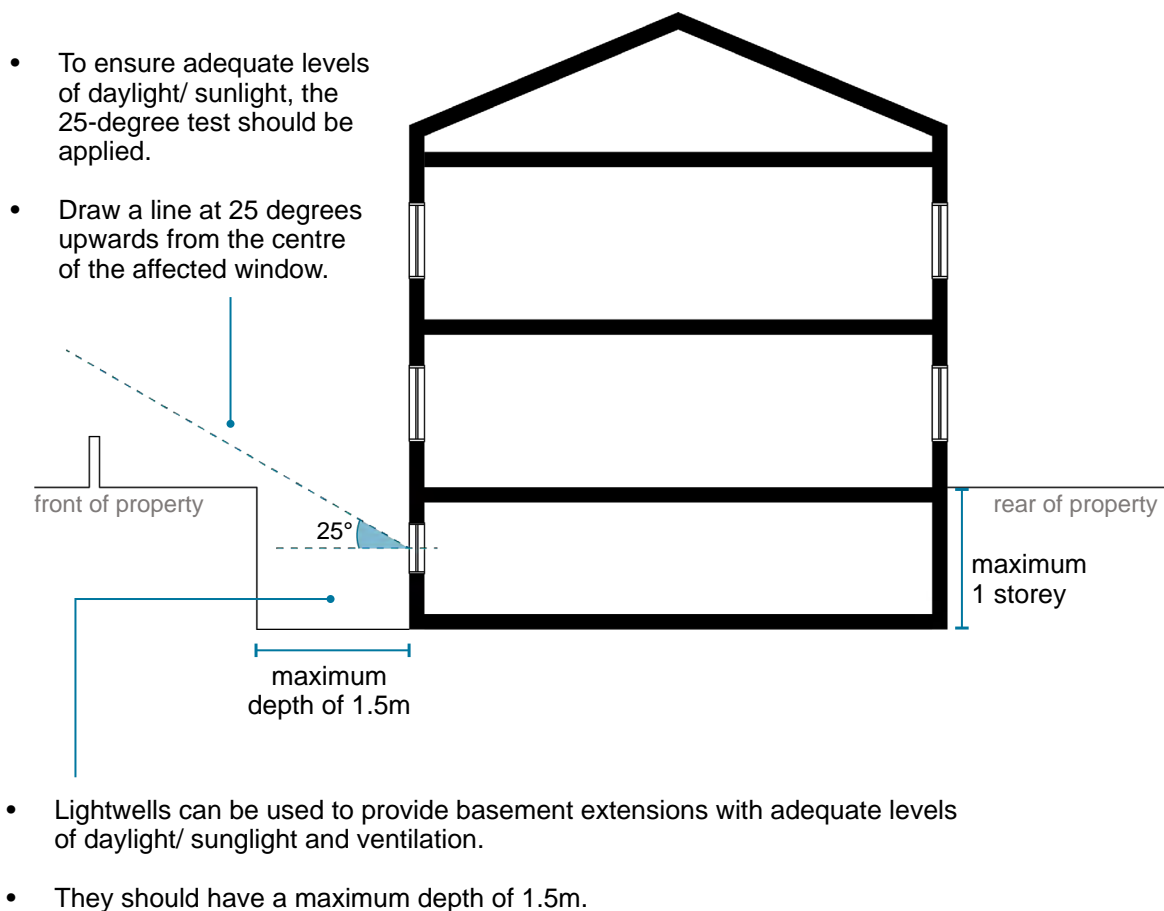


Figure 38: Lightwells

# GLOSSARY

## GLOSSARY

**Active design:** A concept that concerns how the design of buildings and streets can help people to lead more physically active and healthy lives.

**Air source heat pump (ASHP):** A device that transfers heat from the outside air to water. This in turn heats your rooms via radiators or underfloor heating. It can also heat water stored in a hot water cylinder for your hot taps, showers and baths.

**Amenity:** A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquillity.

**Archaeology:** Archaeology refers to buried archaeological finds, layers and features which are buried below the ground and not visible.

**Architectural integrity:** Architectural elements, materials, colour, and quality of the original building construction.

**Architectural interest:** In listed buildings this refers to buildings that are important to the nation because of their architectural design, decoration and craftsmanship. Important examples of significance include plan forms, particular building types and techniques such as using cast iron, the early use of concrete and early prefabricated buildings.

**Arrangement:** Arrangement refers to how the key frames are arranged in a window or door.

**Article 4 Direction:** A direction made under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 which withdraws permitted development rights granted by that Order.

**Balustrade:** A railing or wall on a balcony or staircase, supported by balusters (short decorative pillars).

**Basement Impact Assessment (BIA):** A technical report that assesses the impact of a proposed basement on the rest of the building, neighbouring properties and the environment.

**Biodiversity:** The variety of animal and plant life that exists in a certain place.

**Brick slips:** Specially manufactured tiles which when installed have the appearance, colour and texture of a real clay brick wall.

**Built heritage:** Built Heritage means all the heritage places and features that survive as buildings or structures above ground and are visible and visitable.

**Butterfly roof:** A roof with two roof surfaces sloping down from opposing edges to a valley near the middle of the roof.

**Casement window:** A window that is attached to its frame by one or more hinges at the side.

**Cavity wall:** A type of wall that has a hollow centre.

**Certificate of Lawfulness:** A formal confirmation from a local planning authority that on the date of issuing the Certificate the use of the land or the development of it is lawful.

**Classified roads:** Refers to A roads, B roads, as well as some classified un-numbered roads (known unofficially as C roads). By contrast, unclassified roads are local roads intended for local traffic.

**Condition survey:** A survey carried out by a professional to identify what work is needed to maintain a property and how much this might cost. This may include building structure, roofs, sewage and drainage, electrics, fire safety, asbestos etc.

**Conservation:** The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

**Conservation Areas:** These are areas of special architectural or historic interest whose character or appearance is protected. They have to be formally designated under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990.

**Context:** Context refers to the setting of a site or area, including factors such as townscape, built form, land use, activities, heritage and vehicular and pedestrian movement.

**Cornice:** A decorative feature in the corner of a room where the walls and ceiling meet.

**Crittall:** A well-known manufacturer of steel doors, windows and internal screens.

**Depth of reveal:** The distance between the outer edge of the window or door frame and the interior wall surface.

**Dormer:** A window that projects vertically from a sloping roof.

**Double Glazing:** Windows that have two panes of glass, separated by a sealed gap, which reduces heat transfer.

**Eaves:** The part of a roof that meets or overhangs the walls of a building.

**Elevation:** A side of a building.

**Fenestration:** The arrangement of windows in a building.

**Flush:** Completely level or even with another surface.

**Gable:** The triangular upper part of a wall at the end of a ridged roof.

**Gable roof:** A roof with at least one flat end.

**Glazing bars:** Rigid bars that connect two separate panes of glass.

**Glazing type:** Glazing type refers to whether a window or door is single, double or triple glazed.

**Green infrastructure:** A network of habitats which is often multifunctional and can provide a range of benefits to improve mental health, active lifestyles, recreation, food growing, enhanced biodiversity and ecological resilience, flood risk management, temperature regulation and improved air and water quality.

**Ground source heat pump (GSHP):** A device that transfers heat from the ground outside your home to heat your radiators or underfloor heating. It can also heat water stored in a hot water cylinder for your hot taps and showers.

**Habitable room:** A room that provides living accommodation, such as a bedroom, living room, dining room, study or conservatory. Bathrooms, kitchens that do not include dining space, storerooms and utility rooms are not habitable rooms.

**Harm:** Harm in planning terms means something that may damage a heritage asset or result in a loss of significance.

**Heritage:** Heritage includes all inherited resources which people value for reasons beyond mere utility. These are cultural inherited assets which people identify and value as a reflection and expression of their evolving knowledge, beliefs and traditions, and of their understanding of the beliefs and traditions of others.

**Heritage asset:** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.

**Hip:** The sharp edge of a roof from the ridge to the eaves where the two sides meet.

**Hip roof:** A type of roof where all sides slope downwards to the walls, usually with a fairly gentle slope.

**Historic environment:** A very general term used to refer to everywhere around us that has something significant about it. It is defined by the NPPF as: 'all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged and landscaped and planted or managed flora.'

**Historic integrity:** The ability of a building to convey its historic significance, including materials, design, feeling, location, association, workmanship, and setting.

**Historical interest (buildings):** This refers to buildings that have important aspects of the nation's social, economic, cultural or military history, such as industrial buildings, railway stations, schools, hospitals, theatres, and town halls.

**In situ:** In the original place.

**Joinery:** Wooden components (e.g. of a window frame).

**Lawful Development Certificate:** See Certificate of Lawfulness.

**Lightwell:** A shaft or open space that lets light into a building, often the basement.

**Listed Building:** A building or structure which is considered to be of 'special architectural or historic interest'. This includes a wide variety of structures and buildings. There are three grades of listing depending on the importance of the building.

**Listed Building Consent:** Permission that must be obtained from the Council for any works to a listed building that would affect its special architectural or historic interest.

**Locally Listed Building:** A building, structure or feature which is not statutorily listed but is important in the local context owing to its special architectural or historic interest or its townscape or group value. The protection of local heritage is important because it enhances the value of Southwark's built environment, but also maintains a sense of local distinctiveness which can assist with regeneration and place-making.

**London Plan:** The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years.

**Maisonette:** A two-storey flat with its own front door.

**Mansard extension:** A way of adding extra space to a house by building a mansard roof, effectively adding an extra floor to the property.

**Mansard roof:** A mansard roof is a type of roof which combines elements of a gambrel roof and a hip roof. Like a gambrel roof, a mansard roof has two slopes on each side, with the upper being less steep and shorter than the lower slope. Unlike a gambrel roof, however, a mansard roof has slopes on all four sides.

**Massing:** Massing refers to the combined effect of the height, bulk and silhouette of a building or group of buildings.

**National Planning Policy Framework (NPPF):** The NPPF sets out government's planning policies for England and how these are expected to be applied.

**Net zero (carbon):** Activity that causes no net release of carbon dioxide and other greenhouse gas emissions into the atmosphere.

**Obscure glazing / obscure glass:** Glass that is patterned or frosted to reduce transparency, meaning you cannot see through it clearly.

**Outbuilding:** A smaller separate building such as a shed that belongs to a main building, such as a house

**Outlook:** A view (out of a window).

**Outrigger:** The part of a terraced house, usually incorporating the kitchen area, that projects out of the back of the house. These are common in Victorian and Edwardian homes built in London, including in Southwark.

**Parapet:** A low protective wall along the edge of a roof, bridge, or balcony.

**Party wall:** A wall shared by two adjacent properties.

**Permitted development:** Development that does not require planning permission to be carried out.

**Photovoltaic panels (PVs):** Solar panels that generate electricity (as opposed to solar thermal panels, which are used to provide hot water).

**Rafter:** A rafter is a structural component used in the construction of a roof. It is a sloping beam that supports the weight of the roof and transfers it to the walls or other supporting structures of a building.

**Render:** A first coat of plaster applied to a brick or stone surface.

**Ridge:** The line or edge formed where the two sloping sides of a roof meet at the top.

**Sash window:** A window that slides open vertically or horizontally, rather than using a hinge.

**Reveal:** The portion of a wall opening that is exposed when a window or door is installed. It is the area between the outer edge of the window or door frame and the adjacent wall surface.

**Rooflight:** A window built into a roof.

**Scheduled monument:** A nationally important historic building (or archaeological site) that is protected against unauthorised change.



**Secondary glazing:** The installation of a separate internal window on the inside of the existing window. This replicates the airtight seal and insulation gap offered by double glazing.

**Shingles:** A roof covering consisting of individual overlapping tiles.

**Streetscape:** The appearance or design of a street.

**Stucco:** A cement-type mixture made of Portland cement, lime, sand and water. It is a thin finish coat that goes on the outermost layer of buildings.

**Stud wall:** A partitioning wall made from a stud (timber) frame with plasterboard nailed over the top.

**Supplementary Planning Documents (SPDs):** SPDs explain how current planning policies in the Local Plan will be applied. They also contain background information applicants may find useful when preparing their planning applications.

**Sympathetic:** Designed in a sensitive and appropriate way (in relation to the wider building or streetscape).

**Thermal performance:** Thermal performance means how well a building retains heat.

**Tree Protection Order (TPO):** An order made by a local planning authority in England to protect specific trees, groups of trees or woodlands in the interests of amenity.

**Townscape:** The visual appearance of an urban area.

**U-value:** A useful metric to compare different insulating products. It indicates how much heat is lost through a given thickness of material, accounting for conduction, convection and radiation. The lower the U-value, the better the material is as a thermal insulator. Part L of the Building Regulations includes target U-values for domestic properties.

**Vehicle crossover:** A Vehicle crossover, also known as a Dropped or Lowered Kerb, provides the legal means for motor vehicles to access a property. To create a vehicle crossover, a section of kerb is lowered (known as a 'dropped kerb') and a driveway is created linking the road to property, and/or a site.

**Ventilation:** The provision of fresh air to a room or building.

**Verge:** The edge of tiles projecting over a gable.

**Visual impact assessment (VIA):** A visual impact assessment illustrates how the proposed works would appear on your home and in views from the surrounding area. The assessment should be proportionate to the scale of the works, sensitivity of the property and its location (whether it is listed or in a conservation area, or panels are public facing).





# Consultation plan

**Householder Development Supplementary  
Planning Document (SPD)**

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3	The timetable and methods for consultation	5
4	How to comment	8
5	What happens next?	9

# 1. Introduction

The Householder Development SPD will set out the standard of design expected from the development of existing homes in Southwark.

The guidance in this SPD is relevant to all residents and those who own or manage a home in the borough. This includes guidance for houses and flats as well as homes which are listed buildings or within conservation areas. It is not relevant to the creation of new dwellings.

This SPD provides further guidance for applying the policies in the Southwark Plan 2022. It does not contain new policy. The SPD will be a material consideration with significant weight in determining a planning application.

The SPD covers a broad range of works residents can consider when looking to improve or extend their home. This includes upgrading the external appearance, improving energy efficiency or providing additional space.

## 1.1 The purpose and objectives of this plan

The process of preparing the SPD needs to involve local community groups, residents and landowners to ensure that it meets the needs of those living in Southwark.

The purpose of this consultation plan is to make sure that we involve local people in preparing these documents in a way that considers their needs. There are minimum legal requirements for consultation we need to follow, seen in sections 2 and 3 below.

## **2. How we are consulting**

We carry out consultation in accordance with our adopted Statement of Community Involvement (2022). This explains how we will consult local people in the preparation of planning policy documents. The following section sets out how we plan to meet the minimum statutory consultation requirements and how we will exceed these requirements where appropriate.

In the current stage of consultation, we will invite members of the public and other stakeholders to make representations on the draft Householder Development SPD.

Further details of the next steps are set out in section 5.

### 3. The timetable and methods of consultation

#### 3.1 Consultation timeframe

In accordance with Southwark’s statement of community involvement (SCI), the draft SPD will be available for comment for a minimum of twelve weeks. Additional time will also be added to the consultation to account for the summer period.

The consultation will run from 7<sup>th</sup> August 2024 until 27<sup>th</sup> November 2024.

#### 3.2 Consultation methods

The documents will be published on the council’s website and made available at the council’s Tooley Street offices. An advert publicising the SPD consultation will be put in Southwark News and an email notification will be sent to around 30,000 contacts who have signed up for the Planning Policy mailing list.

The two tables below set out the statutory minimum requirements to meet Government regulations and the further additional consultation methods we intend to do. We include dates when we have meetings confirmed. We also set out the key consultee groups that the consultation method is aimed at.

Table 1: Statutory consultation

<b>METHOD OF CONSULTATION</b>	<b>CONSULTEE</b>	<b>DATE</b>	<b>COMMENTS</b>
Place the SPD on the council’s website.	All	Consultation launch	Our website will continually be updated.
A hard copy of the SPD will be made available at 160 Tooley Street (the Council’s offices)	All	Consultation launch	
Press notice in local newspaper advertising the beginning of the consultation.	All	Consultation launch	This will be in the Southwark News.

Email out to all statutory consultees on planning policy database	All on planning policy consultee database	Consultation launch	
Make a copy of the SPD available for an individual if requested	Individuals if requested	On request	

Table 2: Additional consultation

<b>METHOD OF CONSULTATION</b>	<b>CONSULTEE</b>	<b>DATE</b>	<b>COMMENTS</b>
Email out to all non-statutory consultees on planning policy mailing list. This will set out the timescale for consultation and how people can comment.	All on planning policy mailing list	Consultation launch	An email will be sent to the 30,000+ contacts who have signed up for the Planning Policy mailing list, as well as the groups identified in our SCI.
Officers will attend community meetings, where requested	All who attend the community meetings	Throughout consultation	
Presentation at Southwark Youth parliament	Youth parliament members	Throughout consultation	
Presentation of the SPD to Planning committee	Planning committee	Throughout consultation	
Email notifications to tenants and residents associations	TRA members	Throughout consultation	
Updates on the council's Twitter page	Twitter followers	Throughout consultation	
Place posters in all Southwark libraries. Assistance is available in libraries to those who need help making a comment on an SPD online.	Library users	Consultation launch	



## 4. How to comment

We welcome your comments on the draft SPD once public consultation has launched on 7<sup>th</sup> August 2024.

Please contact us if you want to know more about the documents or about our consultation.

All comments must be received by the consultation close date of 27<sup>th</sup> November 2024. Comments received after this date will not be considered.

Representations can be made by:

- Visiting our consultation website and submitting our online questionnaire. This will be made available once public consultation has launched.
- Sending an email to [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk)
- Alternatively, you can send your response to:

Planning Policy  
160 Tooley Street  
London  
SE1 2QH

## 5. What happens next?

This is the stage of consultation for the Householder Development SPD. Next steps for the policy document are set out below.

After consulting on this first draft of the SPD, we will collate all the feedback we receive and publish a final version of the plan for formal consultation. This will then be considered by Cabinet prior to adoption.

Table 3: Timeline of SPD

Stage of consultation	Consultation timescale
Public consultation of the draft SPD begins	7 <sup>th</sup> August 2024
Public consultation of the draft SPD concludes	27 <sup>th</sup> November 2024
Consideration of consultation responses	December 2024 / January 2025
Adoption of the SPD	May 2025



# **Equality Impact and Needs Analysis**

**Householder Development Supplementary  
Planning Document (SPD)**

**Section 1: Equality impact and needs analysis details**

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<b>Proposed policy/decision/business plan to which this equality analysis relates</b>	Householder Development Supplementary Planning Document
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<b>Equality analysis author</b>	James Holmes		
<b>Strategic Director:</b>	Clive Palfreyman		
<b>Department</b>	Planning Policy	<b>Division</b>	Planning and Growth
<b>Period analysis undertaken</b>	8 February 2024 to 12 February 2024		
<b>Date of review (if applicable)</b>	February 2025		
<b>Sign-off</b>		<b>Position</b>	<b>Date</b>

**Section 2: Brief description of policy/decision/business plan**

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**1.1 Brief description of policy/decision/business plan**

The purpose of the Householder Development supplementary planning document (SPD) is to set out the standard of design expected from the development of existing homes in Southwark.

The SPD has the following objectives:

- To guide the improvement and adaptation of existing homes
- To ensure a high standard of housing for all, ensuring homes are enjoyable, liveable and accessible.
- To encourage the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.
- To ensure works to existing homes mitigate impact on the amenity, privacy and appearance of the surrounding area and neighbours.
- To encourage sustainable technologies, healthy communities and to preserve Southwark's rich heritage

This SPD provides guidance for applying the policies in the Southwark Plan 2022. It does not contain new policy. The SPD will be a material consideration in the determination of a planning application.

The guidance is relevant to all existing homes, whether a house or a flat. The SPD also covers homes which are listed buildings or within conservation areas. It does not apply to the creation of new homes.

The guidance covers a broad range of works including:

- Improving the appearance of a property
- Improving the thermal performance or energy efficiency of a property
- How to find the most appropriate type of extension for a property
- Whether planning permission or listed building consent is required
- If any specialist information is required to support a planning application

### Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
<b>Key users of the department or service</b>	<p>Externally, the key users of the SPD will be Southwark residents who wish to make alterations, improvements or extensions to their home. The SPD will also be used by those who own or manage a residential property in the borough.</p> <p>Other external users may include planning agents, architects or those employed to make changes to a residential property in the borough.</p> <p>Internally, the SPD will be used by planning officers to assess Householder development planning applications as well as those who manage Council-owned residential properties.</p>
<b>Key stakeholders involved in this policy/decision/business plan</b>	<p>The SPD was prepared and developed by the planning division, with input from planning policy and development management officers.</p> <p>The SPD has been reviewed by the Cabinet member for New Homes and Sustainable Development and will be taken to the Council's Cabinet on 18<sup>th</sup> June 2024 to agree the SPD for public consultation.</p> <p>Members of the public will be able to give comments on the SPD at the consultation stage.</p>

## Section 4: Pre-implementation equality impact and needs analysis

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This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio-economic issues (levels of poverty, employment, income). As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantages.

### **Socio-economic disadvantage may arise from a range of factors, including:**

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantage

**The public sector equality duty (PSED)** requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of under-represented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future for All values that we will:

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

<p><b>Age</b> Where this is referred to, it refers to a person belonging to a particular age (e.g. 32-year-olds) or range of ages (e.g. 18 - 30-year-olds).</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential Socio-Economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Requirements of planning permission</u></p> <p>The SPD provides clearer guidance on the type of householder works which require planning permission. This guidance will help those who need to improve, alter or extend their home.</p> <p>This will benefit residents of all ages in the borough. This may also particularly benefit older residents who may need to adapt their homes to meet accessibility requirements and address mobility impairments.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Standard of design</u></p> <p>The SPD sets out the standard of design expected from householder development. This includes guidance on how to improve the appearance of an existing home and to ensure proposed development is of a high quality. This guidance also sets out the type of development which would be inappropriate for a listed building or within conservation areas.</p> <p>This will help to mitigate against unacceptable or harmful development and ensure that homes within the borough are enjoyable, liveable and accessible. This will also protect heritage assets within the borough and the townscape and visual amenity of local areas.</p> <p>This will benefit residents of all ages in the borough.</p>	<p>No positive or negative socio-economic impact applicable.</p>



<p><u>Neighbouring properties</u></p> <p>This SPD outlines the measures which need to be taken to ensure that householder development does not adversely impact any neighbouring properties.</p> <p>This will help to protect the amenity of neighbouring properties and mitigate the impact on their privacy, daylight and sunlight or outlook.</p> <p>This will benefit residents of all ages in the borough.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Climate change</u></p> <p>This SPD encourages the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.</p> <p>This will benefit residents of all ages in the borough.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD will provide guidance that can help residents to improve the energy efficiency of their homes. This includes guidance on low-cost, non-invasive works such as draught proofing. High energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit residents of all ages in the borough.</p>	<p>This could be of socio-economic benefit to young adults.</p> <p>This is because young adults are more likely to live in fuel poverty than any other adult age group.</p>
<p><u>Home or freehold ownership</u></p> <p>The SPD includes guidance for certain householder developments which can be costly to implement or require the permission of the property owner or freeholder to carry out. This includes enhancements to energy efficiency such as window replacements or ways to increase space in a home through extensions or outbuildings.</p> <p>This may be of more benefit to those who own their own home or the freehold and less likely to</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>benefit renters or leaseholders. This is because the works may be easier to carry out for home or freehold owners. Renters and leaseholders are also less likely to pay for substantial works to a property or freehold they do not own.</p> <p>Older adults are more likely to own their home or the freehold than young adults. This means that older residents may benefit greater from the guidance in the SPD as they are the group which can likely make the most use of it.</p>	
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>The median age in Southwark is 33, which is below that of London as a whole (35). (Source: <a href="#">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p> <p>Southwark has an ageing population. Between 2011 and 2021, the proportion of Southwark residents aged 0-9 fell from 12.6% to 10.5%, while the proportion aged 50 and over rose from 20.4% to 24.7%. (Source: <a href="#">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p> <p>A 79% increase in the population of Southwark aged 65 or more is forecast by 2039. This incorporates a 92% increase in those over 75 and 87% growth in those over 85. (Source: Strategic Housing Market Assessment Update 2019 (Source: <a href="#">Housing - Southwark Council</a>)).</p>	<p>In 2021/22 approximately 23,000 children aged 0-15 in Southwark were living in poverty, after housing costs were factored in, equating to 36% of children in the borough. This is higher than the London average of 33%. (Source: <a href="#">JSNA Annual Report - Southwark Council</a>).</p> <p>Council wards with the highest proportions of child poverty (22-28%) include Old Kent Road, Faraday, North Walworth, Chaucer, and Borough and Bankside. Faraday ranks as the most deprived ward in Southwark. These areas overlap with the Old Kent Road, Elephant and Castle, and London Bridge/Bankside Opportunity Areas. (JSNA Annual Report 2023; JSNA Multiward Profiles 2023: West Central Southwark)</p>

<p><u>Energy efficiency</u></p> <p>See socio-economic data column opposite.</p>	<p>Nationally, households where the age of the oldest member is between 16 and 24 have the highest likelihood of being in fuel poverty (25%). No other adult age group exceeds 15%. (Source: <a href="https://publishing.service.gov.uk">Annual fuel poverty statistics in England, 2024 (2023 data)</a> (<a href="https://publishing.service.gov.uk">publishing.service.gov.uk</a>)).</p>
<p><u>Home or freehold ownership</u></p> <p>In 2019, only 5% of households in London headed by someone aged 16-24 owned their own home. By contrast, home ownership rates for householders headed by someone aged 45+ are over 50%. (<a href="#">Housing in London 2020</a>).</p> <p>Leasehold households generally have younger household reference persons (HRPs) than non-leasehold households. In the England Housing Survey 2021-2022, there was a significantly higher proportion of 25–34-year-olds in leasehold households in the owner-occupied sector (14%) than in non-leasehold households overall (8%). (<a href="#">English Housing Survey 2021 to 2022: leasehold households - GOV.UK</a> (<a href="http://www.gov.uk">www.gov.uk</a>)).</p>	<p>Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (Source: GLA - <a href="#">Housing in London 2020</a>).</p>
<b>Mitigating and/or improvement actions to be taken</b>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

**Disability** - 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. Please note that under the PSED due regard includes:

*“the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.”*

This also includes the need to understand and focus on different needs/impacts arising from different disabilities

<b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b>	<b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b>
<p><u>Requirements of planning permission</u></p> <p>The SPD provides clearer guidance on the type of householder works which require planning permission. This guidance will help those who need to improve, alter or extend their home.</p> <p>This will benefit those residents who are disabled and may need to adapt their homes to meet accessibility requirements and address mobility impairments.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Standard of design</u></p> <p>The SPD sets out the standard of design expected from householder development. This includes guidance on how to improve the appearance of an existing home and to ensure proposed development is of a high quality. This guidance also sets out the type of development which would be inappropriate for a listed building or within conservation areas.</p> <p>This will help to mitigate against unacceptable or harmful development and ensure that homes within the borough are enjoyable, liveable and accessible. This will also protect heritage assets within the borough and the townscape and visual amenity of local areas.</p> <p>This will benefit all residents in the borough, including those who are disabled.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>Neighbouring properties</u></p> <p>This SPD outlines the measures which need to be taken to ensure that householder development does not adversely impact any neighbouring properties.</p> <p>This will help to protect the amenity of neighbouring properties and mitigate the impact on their privacy, daylight and sunlight or outlook.</p> <p>This will benefit all residents in the borough, including those who are disabled.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Climate change</u></p> <p>This SPD encourages the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.</p> <p>This will benefit all residents in the borough, including those who are disabled.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD will provide guidance that can help residents to improve the energy efficiency of their homes. This includes guidance on low-cost, non-invasive works such as draught proofing. High energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit residents of all ages in the borough. It may also have a particular benefit for residents with certain disabilities or health conditions who are more vulnerable to the harmful effects of cold weather.</p> <p>In addition, it may have a particular benefit for residents with restricted mobility, dementia or severe mental health issues, who are less able to adapt their behaviour during cold snaps.</p>	<p>This could be of socio-economic benefit to those residents who are disabled.</p> <p>This is because poverty and disability are both risk factors with regard to the harmful effects of cold weather. There is further a known link between disability and poverty.</p> <p>Disabled people are also more likely than non-disabled people to struggle to afford their energy bills.</p>

<p><u>Home or freehold ownership</u></p> <p>The SPD includes guidance for certain householder developments which can be costly to implement or require the permission of the property owner or freeholder to carry out. This includes enhancements to energy efficiency such as window replacements or ways to increase space in a home through extensions or outbuildings.</p> <p>This may be of more benefit to those who own their own home or the freehold and less likely to benefit renters or leaseholders. This is because the works may be easier to carry out for home or freehold owners. Renters and leaseholders are also less likely to pay for substantial works to a property or freehold they do not own.</p> <p>Disabled people are less likely than non-disabled people to own their own home. This means the guidance in the SPD could be less of a benefit to disabled residents.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>In 2021, 8.2% of Southwark residents identified as being disabled and limited a lot. This was a decrease from 11.1% in 2011. Almost a quarter of households (33,000) had at least one resident with a disability. (<a href="#">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p> <p>In 2019 there were 613 households in Southwark with unmet wheelchair accessible accommodation needs. (Strategic Housing Market Assessment Update 2019: <a href="#">Housing - Southwark Council</a>).</p>	<p>The Joseph Rowntree Foundation has found that poverty rates for households with a disabled person or informal carer are much higher than average. (<a href="#">UK Poverty 2023: The essential guide to understanding poverty in the UK   Joseph Rowntree Foundation (jrf.org.uk)</a>).</p>
<p><u>Energy efficiency</u></p> <p>There is strong evidence linking a range of health conditions to vulnerability to cold weather. These include cardiovascular conditions, and respiratory conditions such as chronic obstructive pulmonary disease and</p>	<p>There is strong evidence linking poverty to heightened vulnerability to cold weather. This relates to poor quality homes and fuel poverty. (Source: <a href="#">Supporting</a></p>

<p>childhood asthma. Exposure to cold can increase the risk of blood clots forming in the body (in turn increasing the risk of heart attacks and strokes), increase susceptibility to chest infections, worsen breathing problems, and increase the risk of falls. (Source: <a href="https://www.gov.uk/government/publications/supporting-vulnerable-people-before-and-during-cold-weather-healthcare-professionals">Supporting vulnerable people before and during cold weather: healthcare professionals - GOV.UK (www.gov.uk)</a>).</p>	<p><a href="https://www.gov.uk/government/publications/vulnerable-people-before-and-during-cold-weather-for-adult-social-care-managers">vulnerable people before and during cold weather: for adult social care managers - GOV.UK (www.gov.uk)</a>).</p> <p>According to ONS data from 2022, 55% of disabled adults in the UK reported finding it difficult to afford their energy bills. This compares with 40% of non-disabled people. (<a href="https://ons.gov.uk/peopleandplaces/populationanddemographics/energyandcostofliving">Impact of increased cost of living on adults across Great Britain - Office for National Statistics (ons.gov.uk)</a>).</p> <p>People with chronic obstructive pulmonary disease are more likely to live in poverty. (Source: <a href="https://ons.gov.uk/peopleandplaces/populationanddemographics/healthandcare/estimating-the-number-of-people-with-cardiovascular-or-respiratory-conditions-living-in-poverty-england">Estimating the number of people with cardiovascular or respiratory conditions living in poverty, England - Office for National Statistics</a>).</p>
<p><u>Home ownership</u></p> <p>According to the ONS, in 2021 40% of disabled people in the UK owned their own home, compared to 53% of non-disabled people (<a href="https://ons.gov.uk/peopleandplaces/populationanddemographics/healthandcare/outcomes-for-disabled-people-in-the-uk">Outcomes for disabled people in the UK - Office for National Statistics (ons.gov.uk)</a>).</p>	<p>Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (<a href="https://www.london.gov.uk/press-releases/major/housing-in-london-2020">Housing in London 2020</a>).</p>
<b>Mitigating and/or improvement actions to be taken</b>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise</p>

<p><b>Gender reassignment</b> - The process of transitioning from one gender to another.</p> <p><b>Gender Identity</b> - Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Requirements of planning permission</u></p> <p>The SPD provides clearer guidance on the type of householder works which require planning permission. This guidance will help those who need to improve, alter or extend their home.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Standard of design</u></p> <p>The SPD sets out the standard of design expected from householder development. This includes guidance on how to improve the appearance of an existing home and to ensure proposed development is of a high quality. This guidance also sets out the type of development which would be inappropriate for a listed building or within conservation areas.</p> <p>This will help to mitigate against unacceptable or harmful development and ensure that homes within the borough are enjoyable, liveable and accessible. This will also protect heritage assets within the borough and the townscape and visual amenity of local areas.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>No positive or negative socio-economic impact applicable.</p>



<p><u>Neighbouring properties</u></p> <p>This SPD outlines the measures which need to be taken to ensure that householder development does not adversely impact any neighbouring properties.</p> <p>This will help to protect the amenity of neighbouring properties and mitigate the impact on their privacy, daylight and sunlight or outlook.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Climate change</u></p> <p>This SPD encourages the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD will provide guidance that can help residents to improve the energy efficiency of their homes. This includes guidance on low-cost, non-invasive works such as draught proofing. High energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Home or freehold ownership</u></p> <p>The SPD includes guidance for certain householder developments which can be costly to implement or require the permission of the property owner or freeholder to carry out. This includes enhancements to energy efficiency such as window replacements or ways to increase space in a home through extensions or outbuildings.</p> <p>This may be of more benefit to those who own their own home or the freehold and less likely</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>to benefit renters or leaseholders. This is because the works may be easier to carry out for home or freehold owners. Renters and leaseholders are also less likely to pay for substantial works to a property or freehold they do not own.</p> <p>Transgender people are less likely than cisgender people to own their own home. This means the guidance in the SPD could be less of a benefit to transgender residents.</p>	
<p><b>Equality information on which above analysis is based.</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>1.23% of people aged 16 years and over in Southwark have a gender identity different from their sex registered at birth. (Census 2021)</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Home ownership</u></p> <p>In the last census, 31% of cisgender Southwark residents responded that they lived in a home that is owned by themselves or someone they live with (either outright, or with a mortgage, loan or shared ownership). By contrast, only 13.3% of trans women and 16.7% of trans men in Southwark selected one of these housing tenures. (Source: <a href="#">Gender identity by tenure - Office for National Statistics (ons.gov.uk)</a>).</p>	<p>Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (<a href="#">Housing in London 2020</a>).</p>
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

<p><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 couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)</p>	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>	<b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b>
<p><u>Requirements of planning permission</u></p> <p>The SPD provides clearer guidance on the type of householder works which require planning permission. This guidance will help those who need to improve, alter or extend their home.</p> <p>This will benefit all residents in the borough, including those of all marital statuses.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Standard of design</u></p> <p>The SPD sets out the standard of design expected from householder development. This includes guidance on how to improve the appearance of an existing home and to ensure proposed development is of a high quality. This guidance also sets out the type of development which would be inappropriate for a listed building or within conservation areas.</p> <p>This will help to mitigate against unacceptable or harmful development and ensure that homes within the borough are enjoyable, liveable and accessible. This will also protect heritage assets within the borough and the townscape and visual amenity of local areas.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Neighbouring properties</u></p> <p>This SPD outlines the measures which need to be taken to ensure that householder development does not adversely impact any neighbouring properties.</p> <p>This will help to protect the amenity of neighbouring properties and mitigate the</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>impact on their privacy, daylight and sunlight or outlook.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses.</p>	
<p><u>Climate change</u></p> <p>This SPD encourages the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD will provide guidance that can help residents to improve the energy efficiency of their homes. This includes guidance on low-cost, non-invasive works such as draught proofing. High energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses.</p>	<p>This could be of socio-economic benefit to young adults.</p> <p>This is because young adults are more likely to live in fuel poverty than any other adult age group.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>The latest census found that 26.9% of Southwark residents were married or in a civil partnership. This was a fall from 29.4% in 2011. Southwark had the fourth-highest percentage of adults who had never been married or in a civil partnership of all English local authorities. (<a href="https://www.ons.gov.uk/peoplepopulationandcommunity/healthandlife/articles/how-life-has-changed-in-southwark-census-2021/2021-08-10">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Mitigating or improvement actions to be taken</b></p>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

<p><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.</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Requirements of planning permission</u> The SPD provides clearer guidance on the type of householder works which require planning permission. This guidance will help those who need to improve, alter or extend their home.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Standard of design</u> The SPD sets out the standard of design expected from householder development. This includes guidance on how to improve the appearance of an existing home and to ensure proposed development is of a high quality. This guidance also sets out the type of development which would be inappropriate for a listed building or within conservation areas.</p> <p>This will help to mitigate against unacceptable or harmful development and ensure that homes within the borough are enjoyable, liveable and accessible. This will also protect heritage assets within the borough and the townscape and visual amenity of local areas.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>Neighbouring properties</u></p> <p>This SPD outlines the measures which need to be taken to ensure that householder development does not adversely impact any neighbouring properties.</p> <p>This will help to protect the amenity of neighbouring properties and mitigate the impact on their privacy, daylight and sunlight or outlook.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Climate change</u></p> <p>This SPD encourages the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD will provide guidance that can help residents to improve the energy efficiency of their homes. This includes guidance on low-cost, non-invasive works such as draught proofing. High energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>The total number of babies born in Southwark has been decreasing year on year over the past 10 years. The decline in the fertility rate in Southwark is seen across all age groups, but</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>particularly among younger women. The average age of mothers giving birth in Southwark in 2022 was around 33 years. (Source: <a href="#">JSNA Annual Report - Southwark Council</a>).</p>	
<b>Mitigating and/or improvement actions to be taken</b>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

<p><b>Race</b> - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Requirements of planning permission</u></p> <p>The SPD provides clearer guidance on the type of householder works which require planning permission. This guidance will help those who need to improve, alter or extend their home.</p> <p>This will benefit all residents in the borough, including those of all ethnicities.</p> <p>The guidance on increasing space in a home may be of particular benefit to those residents who live in overcrowded households. Overcrowding levels vary greatly between ethnic minorities and is above average for most. Black, Black British, Black Welsh, Caribbean or African households have the highest level of overcrowding.</p> <p>Those who speak English as a second language may find it challenging to understand</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>the guidance provided in the SPD. This means the guidance in the SPD could be less of a benefit to those residents who speak English as a second language.</p>	
<p><u>Standard of design</u></p> <p>The SPD sets out the standard of design expected from householder development. This includes guidance on how to improve the appearance of an existing home and to ensure proposed development is of a high quality. This guidance also sets out the type of development which would be inappropriate for a listed building or within conservation areas.</p> <p>This will help to mitigate against unacceptable or harmful development and ensure that homes within the borough are enjoyable, liveable and accessible. This will also protect heritage assets within the borough and the townscape and visual amenity of local areas.</p> <p>This will benefit all residents in the borough, including those of all ethnicities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Neighbouring properties</u></p> <p>This SPD outlines the measures which need to be taken to ensure that householder development does not adversely impact any neighbouring properties.</p> <p>This will help to protect the amenity of neighbouring properties and mitigate the impact on their privacy, daylight and sunlight or outlook.</p> <p>This will benefit all residents in the borough, including those of all ethnicities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Climate change</u></p> <p>This SPD encourages the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.</p> <p>This will benefit all residents in the borough, including those of all ethnicities.</p>	<p>No positive or negative socio-economic impact applicable.</p>



<p><u>Energy efficiency</u></p> <p>The SPD will provide guidance that can help residents to improve the energy efficiency of their homes. This includes guidance on low-cost, non-invasive works such as draught proofing. High energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including those of all ethnicities. This may be of particular benefit to Bangladeshi, Black and Pakistani households as they are more likely to live in cold homes.</p>	<p>This could be of socio-economic benefit to ethnic minority residents.</p> <p>This is because ethnic minority households are more likely to live in fuel poverty than white households.</p>
<p><u>Home or freehold ownership</u></p> <p>The SPD includes guidance for certain householder developments which can be costly to implement or require the permission of the property owner or freeholder to carry out. This includes enhancements to energy efficiency such as window replacements or ways to increase space in a home through extensions or outbuildings.</p> <p>This may be of more benefit to those who own their own home or the freehold and less likely to benefit renters or leaseholders. This is because the works may be easier to carry out for home or freehold owners. Renters and leaseholders are also less likely to pay for substantial works to a property or freehold they do not own.</p> <p>Home ownership varies greatly between ethnic minorities and is below average for most. This means the guidance in the SPD could be less of a benefit to some ethnicities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>Southwark is a very ethnically diverse borough. In 2021, 51.4% of residents identified as white (a decrease from 54.2% in 2011). 25.1% identified as 'Black, Black British, Black Welsh,</p>	<p>29% of Black residents live in the borough's most deprived neighbourhoods, while only 17% of the borough's white residents</p>

<p>Caribbean or African'. 9.9% identified as 'Asian, Asian British or Asian Welsh'. 6.3% identified as 'Arab of any other ethnic group'. (<a href="#">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p>	<p>live in these neighbourhoods. (<a href="#">JSNA Annual Report - Southwark Council</a>).</p>
<p><u>Languages</u></p> <p>244,000 (79%) Southwark residents reported their main language to be English. This is comparable to London, where 76% of residents recorded English as their main language, but lower than across England (88% of the population).</p> <p>Spanish is the most common main language other than English, spoken by 13,000 Southwark residents. 'All other Chinese' is the most common Asian language, while Somali is the most spoken African language of Southwark residents.</p> <p>Of the 53,700 Southwark residents whose main language is not English, 10,200 (19%) cannot speak English well or have no English proficiency.</p> <p>(Source: <a href="#">Census 2021 Profile: Ethnicity, National Identity, Language and Religion – Southwark.gov.uk</a>)</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Overcrowding</u></p> <p>The 2021 census found that 2.5% of households in England where all residents identified as white were overcrowded. This is lower than any other ethnic group or combination of groups. Households where all members identified as "Black, Black British, Black Welsh, Caribbean or African" had the highest level of overcrowding (16.1% in England). (<a href="#">Overcrowding and under-occupancy by household characteristics, England and Wales - Office for National Statistics (ons.gov.uk)</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>Research by the Joseph Rowntree Foundation has found that 17%, 11%, and 8% of households headed by someone Bangladeshi, Black and Pakistani respectively are not kept adequately warm. 5% of households headed</p>	<p>In the 2 years to March 2021, an average of 12.6% of white households were in fuel poverty, compared with 19.1% of households from all other ethnic</p>

<p>by someone White are not kept adequately warm. (Source: <a href="#">Ethnicity and the heightened risk of very deep poverty   Joseph Rowntree Foundation (jrf.org.uk)</a>)</p>	<p>groups combined. (<a href="#">Fuel poverty - GOV.UK Ethnicity facts and figures (ethnicity-facts-figures.service.gov.uk)</a>).</p>
<p><u>Home ownership</u></p> <p>The English Housing Survey 2017-2018 found that 68% of White British households owned their own home (outright or with a mortgage). The level of home ownership is lower among all other ethnic groups except Indian and Mixed White/Asian. The level of home ownership is lowest among Black African and Arab households (20% and 17% respectively). (<a href="#">Home ownership - GOV.UK Ethnicity facts and figures (ethnicity-facts-figures.service.gov.uk)</a>).</p>	<p>Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (<a href="#">Housing in London 2020</a>).</p>
<b>Mitigating and/or improvement actions to be taken</b>	
<p>Those who speak English as a second language may find it challenging to understand the guidance provided in the SPD. This means the guidance in the SPD could be less of a benefit to those residents who speak English as a second language.</p> <p>Of the 53,700 Southwark residents whose main language is not English, 10,200 (19%) cannot speak English well or have no English proficiency. (<a href="#">Census 2021 Profile: Ethnicity, National Identity, Language and Religion – Southwark.gov.uk</a>)</p> <p>To mitigate this, the Council can translate the SPD into different languages upon request. The SPD has further adhered to Hemingway Plain English guidelines to ensure the text is as accessible as practical.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

<p><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.</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Requirements of planning permission</u></p> <p>The SPD provides clearer guidance on the type of householder works which require planning permission. This guidance will help those who need to improve, alter or extend their home.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups.</p> <p>The guidance on increasing space in a home may be of particular benefit to those residents who live in overcrowded households. Overcrowding levels vary greatly between religious and belief groups. Muslim households have the highest level of overcrowding. Overcrowding is also higher than average among Hindu, Sikh, and Buddhist households.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Standard of design</u></p> <p>The SPD sets out the standard of design expected from householder development. This includes guidance on how to improve the appearance of an existing home and to ensure proposed development is of a high quality. This guidance also sets out the type of development which would be inappropriate for a listed building or within conservation areas.</p> <p>This will help to mitigate against unacceptable or harmful development and ensure that homes within the borough are enjoyable, liveable and accessible. This will also protect heritage assets within the borough and the townscape and visual amenity of local areas.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>Neighbouring properties</u></p> <p>This SPD outlines the measures which need to be taken to ensure that householder development does not adversely impact any neighbouring properties.</p> <p>This will help to protect the amenity of neighbouring properties and mitigate the impact on their privacy, daylight and sunlight or outlook.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Climate change</u></p> <p>This SPD encourages the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD will provide guidance that can help residents to improve the energy efficiency of their homes. This includes guidance on low-cost, non-invasive works such as draught proofing. High energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>Home or freehold ownership</u></p> <p>The SPD includes guidance for certain householder developments which can be costly to implement or require the permission of the property owner or freeholder to carry out. This includes enhancements to energy efficiency such as window replacements or ways to increase space in a home through extensions or outbuildings.</p> <p>This may be of more benefit to those who own their own home or the freehold and less likely to benefit renters or leaseholders. This is because the works may be easier to carry out for home or freehold owners. Renters and leaseholders are also less likely to pay for substantial works to a property or freehold they do not own.</p> <p>Home ownership varies greatly between religious and belief groups. The level of home ownership is below average among Muslims, Buddhists, and non-religious people. This means the guidance in the SPD could be less of a benefit to these groups.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>The latest census found that 43.3% of Southwark residents identify as Christian and 9.6% identify as Muslim. 1.1% identify as Hindu, 1% identify as Buddhist, and 0.2% identify as Sikh. 36.4% identify as having no religion. (<a href="#">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Overcrowding</u></p> <p>The 2021 Census found that 4.4% of all households in England were overcrowded. The rate of overcrowding among Muslim households was 22.5%.</p> <p>The rate of overcrowding was also higher than average among Hindu, Sikh, and Buddhist households. (<a href="#">Overcrowding and under-</a></p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><a href="#">occupancy by household characteristics, England and Wales - Office for National Statistics (ons.gov.uk)</a>.</p>	
<p><u>Home ownership</u></p> <p>The 2021 Census found that 63% of people in England and Wales lived in households that owned their own accommodation (outright, with a mortgage, or shared ownership).</p> <p>Only 46% of Muslim people and 57% of Buddhist people lived in a household that owned their own accommodation. For people of no religion the figure is 59%. The figure is higher than average for people who are Sikh, Jewish, Christian or Hindu. (<a href="#">Religion by housing, health, employment, and education, England and Wales - Office for National Statistics (ons.gov.uk)</a>).</p>	<p>Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (<a href="#">Housing in London 2020</a>).</p>
<b>Mitigating and/or improvement actions to be taken</b>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

<b>Sex</b> - A man or a woman.	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b>	<b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b>
<p><u>Requirements of planning permission</u></p> <p>The SPD provides clearer guidance on the type of householder works which require planning permission. This guidance will help those who need to improve, alter or extend their home.</p> <p>This will benefit all residents in the borough, including both men and women.</p>	No positive or negative socio-economic impact applicable.
<p><u>Standard of design</u></p> <p>The SPD sets out the standard of design expected from householder development. This includes guidance on how to improve the appearance of an existing home and to ensure proposed development is of a high quality. This guidance also sets out the type of development which would be inappropriate for a listed building or within conservation areas.</p> <p>This will help to mitigate against unacceptable or harmful development and ensure that homes within the borough are enjoyable, liveable and accessible. This will also protect heritage assets within the borough and the townscape and visual amenity of local areas.</p> <p>This will benefit all residents in the borough, including both men and women.</p>	No positive or negative socio-economic impact applicable.
<p><u>Neighbouring properties</u></p> <p>This SPD outlines the measures which need to be taken to ensure that householder development does not adversely impact any neighbouring properties.</p> <p>This will help to protect the amenity of neighbouring properties and mitigate the impact on their privacy, daylight and sunlight or outlook.</p>	No positive or negative socio-economic impact applicable.



<p>This will benefit all residents in the borough, including both men and women.</p>	
<p><u>Climate change</u></p> <p>This SPD encourages the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.</p> <p>This will benefit all residents in the borough, including both men and women.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD will provide guidance that can help residents to improve the energy efficiency of their homes. This includes guidance on low-cost, non-invasive works such as draught proofing. High energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including both men and women.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>The Census 2021 found that 51.6% of Southwark's residents are women and 48.4% are men. (Census 2021)</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

<b>Sexual orientation</b> - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b>	<b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b>
<p><u>Requirements of planning permission</u> The SPD provides clearer guidance on the type of householder works which require planning permission. This guidance will help those who need to improve, alter or extend their home.</p> <p>This will benefit all residents in the borough, including all sexual orientations.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Standard of design</u></p> <p>The SPD sets out the standard of design expected from householder development. This includes guidance on how to improve the appearance of an existing home and to ensure proposed development is of a high quality. This guidance also sets out the type of development which would be inappropriate for a listed building or within conservation areas.</p> <p>This will help to mitigate against unacceptable or harmful development and ensure that homes within the borough are enjoyable, liveable and accessible. This will also protect heritage assets within the borough and the townscape and visual amenity of local areas.</p> <p>This will benefit all residents in the borough, including all sexual orientations.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Neighbouring properties</u></p> <p>This SPD outlines the measures which need to be taken to ensure that householder development does not adversely impact any neighbouring properties.</p> <p>This will help to protect the amenity of neighbouring properties and mitigate the</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>impact on their privacy, daylight and sunlight or outlook.</p> <p>This will benefit all residents in the borough, including all sexual orientations.</p>	
<p><u>Climate change</u></p> <p>This SPD encourages the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.</p> <p>This will benefit all residents in the borough, including all sexual orientations.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD will provide guidance that can help residents to improve the energy efficiency of their homes. This includes guidance on low-cost, non-invasive works such as draught proofing. High energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including all sexual orientations.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Home or freehold ownership</u></p> <p>The SPD includes guidance for certain householder developments which can be costly to implement or require the permission of the property owner or freeholder to carry out. This includes enhancements to energy efficiency such as window replacements or ways to increase space in a home through extensions or outbuildings.</p> <p>This will be of more benefit to those who own their own home or the freehold and less likely to benefit renters or leaseholders. This is because the works will be easier to carry out for home or freehold owners. Renters and leaseholders are also less likely to pay for substantial works to a property or freehold they do not own.</p> <p>Home ownership levels vary between people of different sexual orientations. Data shows that</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>lesbian and gay people in Southwark are more likely to own their own home (or live with someone who does) than heterosexual people, but for bisexual people this is much less likely. This means the guidance in the SPD could be less of a benefit to bisexual residents.</p>	
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>In the latest census 8.08% of Southwark's residents identified as LGB+. This is the fourth highest figure of any local authority district in England and Wales. The areas with the highest proportion of LGB+ residents are in the north-west of the borough. (Census 2021)</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Home ownership</u></p> <p>In the last census, 30.2% of heterosexual Southwark residents responded that they lived in a home that is owned by themselves or someone they live with (either outright, or with a mortgage, loan or shared ownership). For lesbian and gay people, this figure was 45.4%, but for bisexual people it was only 24.4%. For people who selected the 'all other sexual orientations' option, the figure was 16.7%. (Source: <a href="https://ons.gov.uk">Office for National Statistics (ons.gov.uk)</a>)</p>	<p>Within London, owner occupiers with mortgages are significantly under-represented in the lower income quintiles. 76% of owner occupiers with a mortgage are in the top two fifths of the national household income distribution, while only 9% are in the bottom fifth. (<a href="#">Housing in London 2020</a>).</p>
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

### **Human Rights**

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

### **Potential impacts (positive and negative) of proposed policy/ decision/ business plan**

The SPD provides guidance on how to apply the relevant policies of the Southwark Plan 2022. It does not create any new policy. The SPD seeks to provide clearer guidance on the type of householder works which require planning permission and sets out the standard of design expected from these developments. This includes protecting the heritage assets within the borough, the townscape and visual amenity of local areas and the amenity of neighbouring properties. The SPD further encourages the refurbishment of homes to improve energy efficiency, reduce energy demand, carbon emissions and adapt to the effects of climate change.

This protects local identity and improves public realm considerate of the Human Rights Act.

### **Information on which above analysis is based**

All data illustrated in Southwark Plan Integrated Impact Assessment (February 2022) for Strategic Policy 2 Southwark Together, Strategic Policy 5 Thriving neighbourhoods and tackling health inequalities and Strategic policy 6 Climate Emergency. The SPD provides guidance and contributes to IIAO5 'To promote social inclusion, equality, diversity and community cohesion', IIAO6 'To reduce contributions to climate change', IIAO11 'To protect and enhance quality of landscape and townscape', IIAO12 'To conserve and enhance the historic environment and cultural assets', IIAO15 'To provide everyone with the opportunity to live in a decent home'.

### **Mitigating and/or improvement actions to be taken**

As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on human rights. The Council will mitigate against any unforeseen issues that arise.

## **Conclusions**

Overall, the SPD will have no negative impacts on the equalities of residents in Southwark. There are many benefits of the SPD for all residents in the borough, including all protected characteristics. Certain guidance will benefit some groups more than others as some residents will be able to make more use of the SPD than others.

This SPD provides clearer guidance on the type of householder works which require planning permission. This guidance will help those who need to improve, alter or extend their home. This will be particularly beneficial for protected characteristics who need to adapt their homes to suit accessibility requirements or increase space due to overcrowding.

This SPD sets out the standard of design expected from householder development. This will help to mitigate against unacceptable or harmful development and ensure that homes within the borough are enjoyable, liveable and accessible. This includes protecting the heritage assets within the borough, the townscape and visual amenity of local areas and the amenity of neighbouring properties. This will benefit all residents of the borough, including all protected characteristics.

The SPD further encourages the refurbishment of homes to improve energy efficiency, reduce energy demand, carbon emissions and adapt to the effects of climate change. These positive impacts will benefit all residents of the borough, including all protected characteristics. The guidance on improving energy efficiency will have a particular socio-economic benefit for many groups.

There is some guidance in the SPD which may be more of a benefit to those who own their home or the freehold and less likely to benefit renters or leaseholders. This is because the works may be easier to carry out for home or freehold owners. Renters and leaseholders are also less likely to pay for substantial works to a property or freehold they do not own. The SPD does not cause a negative impact to renters or leaseholders, but these groups are less likely to make use of the guidance provided. Guidance on low-cost and non-invasive works has also been provided, notably in relation to improving energy efficiency which is a key socio-economic benefit for many of the protected characteristics.

Those who speak English as a second language may find it challenging to understand the guidance provided in the SPD. This means the guidance in the SPD could be less of a benefit to those residents who speak English as a second language. Mitigation measures to address this concern have been set out in section 5.

The Council will continue to monitor impacts on all protected characteristics and will mitigate against any unforeseen issues that arise.

## Section 5: Further equality actions and objectives

<b>Further actions</b>			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
<b>No.</b>	<b>Description of issue</b>	<b>Action</b>	<b>Timeframe</b>
1	Ensure that the Householder Development SPD is adopted within the shortest timeframe possible by the Council so that the benefits identified can be secured.	Progress the Householder Development SPD towards public consultation and then formal adoption at Cabinet.	Public consultation proposed to be agreed at Cabinet on 22 <sup>nd</sup> July 2024.
2	Ensure that the implementation of the Householder Development SPD is monitored following adoption for potential actual effects on different groups.	The outcomes of implementing the guidance in the SPD will be monitored through the Authority Monitoring Report (AMR). Equality analysis is an ongoing process and that does not end once the SPD is implemented.	Monitoring will be undertaken annually.
3	Ensure that there is no language barrier preventing residents from accessing the SPD.	Upon request the Council can translate the documents into other languages.	Upon request.



# **Strategic Environmental Assessment (SEA)**

**Householder Development Supplementary  
Planning Document (SPD)**



## 1. Introduction

This is a Strategic Environmental Assessment screening document for Householder Development Supplementary Planning Document. It determines that a Strategic Environmental Assessment is not required in this case for the reasons outlined in the remainder of this report.

## 2. Legislative Background

A Strategic Environmental Assessment (SEA) is a way of ensuring the environmental implications of a plan or programme for 'town or country planning or 'land use' are taken into account. The need for environmental assessments is set out in the EU Directive 2001/42/EC (hereafter referred to as the SEA Directive). This has subsequently been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (hereafter referred to as the SEA Regulations).

The Government's Planning Practice Guidance (PPG) published in September 2023 states that in some limited circumstances, where a Supplementary Planning Document (SPD) could have significant environmental effects, it may fall within the scope of the SEA Regulations and would require an SEA. To determine whether the Householder Development SPD could have significant environmental effects, its potential scope has been assessed against the criteria set out in [1 to the SEA Regulations](#).<sup>[OBJ]OBJ</sup> noted in the PPG, an SEA is unlikely to be required where an SPD deals only with a small area at a local level (see regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004). However, an SEA is required if there are likely to be significant environmental effects.<sup>[OBJ]OBJ</sup>

## 3. Screening Process

The screening opinion assessment is undertaken in two parts: the first part will assess whether the SPD requires SEA (as per the flow chart shown in Figure 1); and the second part of the assessment will consider whether the SPD is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the SEA Directive and the SEA Regulations.

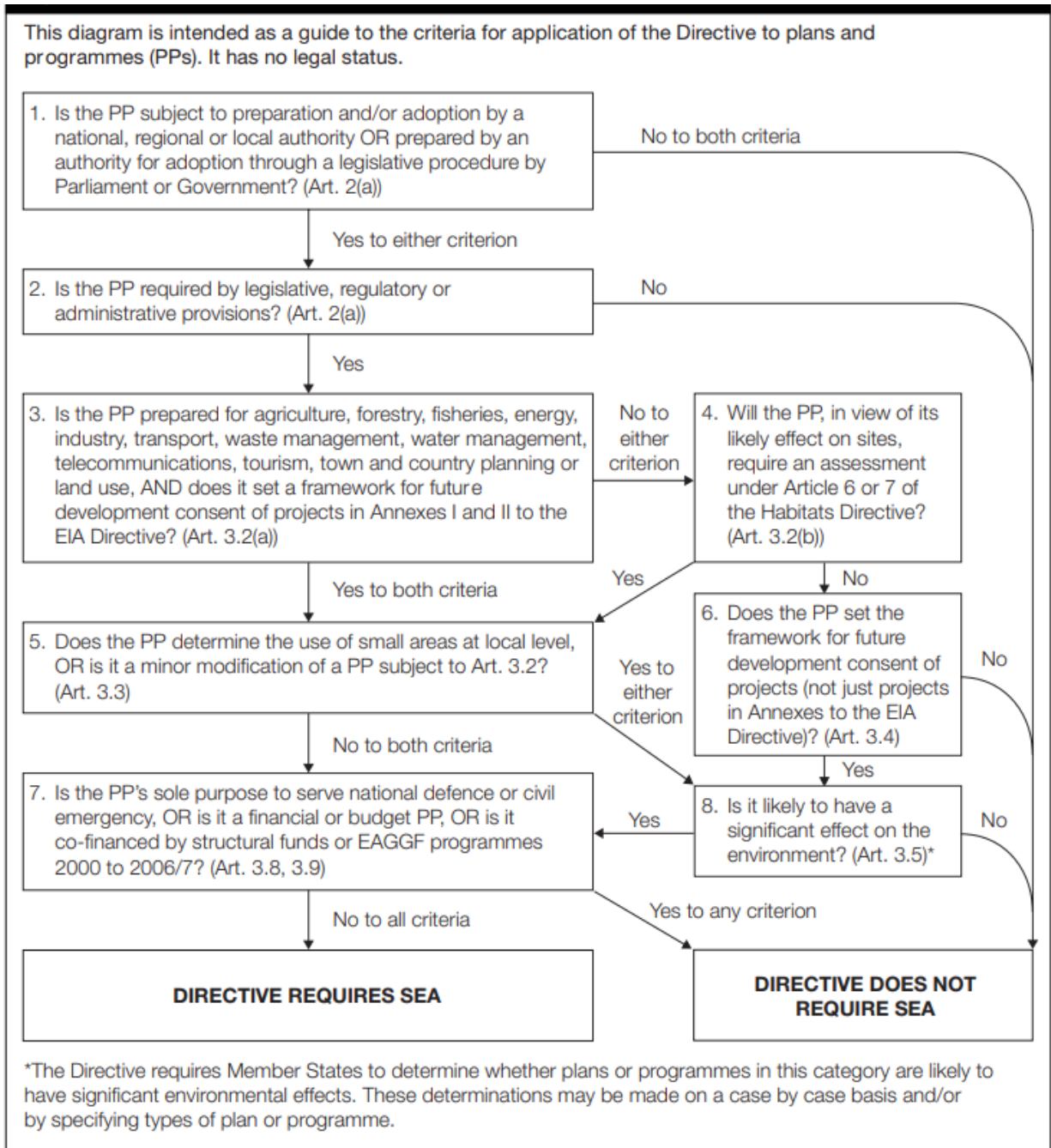


Figure 1: Application of the SEA Directive to plans and programmes

#### 4. Summary of the SPD

<b>Details of SPD</b>	
<b>Name of SPD</b>	Householder Development Supplementary Planning Document (SPD)
<b>Geographic Coverage</b>	The entire borough
<b>Purpose</b>	<p>To provide guidance to support Southwark Plan policies. It does not contain new policy. The SPD is a material consideration with significant weight in the determination of a planning application.</p> <p>The SPD has the following objectives</p> <ul style="list-style-type: none"> <li>• To guide the improvement and adaptation of existing homes</li> <li>• To ensure a high standard of housing for all, ensuring homes are enjoyable, liveable and accessible.</li> <li>• To encourage the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.</li> <li>• To ensure works to existing homes mitigate impact on the amenity, privacy and appearance of the surrounding area and neighbours.</li> <li>• To encourage sustainable technologies, healthy communities and to preserve Southwark's rich heritage</li> </ul>

<b>Summary of content</b>	<p>The SPD covers a broad range of works which can be considered when looking to improve or extend a home. This includes;</p> <ul style="list-style-type: none"><li>• Improving the appearance of a home</li><li>• Improving the thermal performance or energy efficiency of a home</li><li>• How to find the most appropriate type of extension for a home</li><li>• Whether planning permission or listed building consent is required</li><li>• If any specialist information is required to support a planning application</li></ul>
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## 5. Assessment 1: Screening Assessment Establishing the Need for SEA Stage

Stage	Y/N	Reason
Is the SPD subject to preparation and/or adoption by a national, regional or local authority, OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	Yes.  The SPD will be prepared and adopted by Southwark Council in its role as Local Planning Authority, which is allowed under the Town and Country Planning Act 1990.
Is the SPD required by legislative, regulatory or administrative provisions? (Art. 2(a))	N	No.  The preparation of this SPD is not a requirement of legislation, regulatory or administrative provisions.
Is the SPD prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art. 3.2(a))	Y	Yes.  The SPD is intended to provide further guidance to the adopted Southwark Plan 2022 which is the land-use planning policy framework for its area. This has been subject to full Sustainability Appraisal (including SEA). The SPD will not create new policy or land-use designations.
Will the SPD, in view of its likely effect on site, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))	N	No.  The HRA of the Southwark Plan 2022 has been undertaken alongside the IIA, with the findings of the HRA informing the IIA. The methods and findings of the HRA process are reported separately from the IIA and the report has been approved by the statutory consultee (Natural England) and placed online to be accessed by the wider public.

		<p>The HRA screening process has found that the policies and site allocations to be adopted under the Southwark Plan 2022 will have no negative impact on the four European Sites that are located within a 10km boundary of Southwark, either alone or when considered in combination with other existing plans and projects. In light of this finding, it is not required to carry out any further HRA analysis.</p> <p>The SPD will not change or add to policy, proposals or designations within the Local Plan, therefore it is not considered that further screening for such assessment is necessary as there would be no significant effects on European Sites.</p>
<p>Does the SPD determine the use of small areas at local level OR is it a minor modification of a plan or programme subject to Art. 3.2? (Art. 3.3)</p>	<p>N</p>	<p>No.</p> <p>There are no additional policies, proposals or allocations contained within the SPD which have not already been set within the Local Plan. There will be no aspect of the SPD which would modify the emerging Local Plan, just support it.</p>
<p>Does the SPD set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art. 3.4)</p>	<p>N</p>	<p>No.</p> <p>This framework is already set within the Local Plan. The SPD will provide further guidance on the relevant policies, proposals or allocations within the Local Plan.</p>

<p>Is the SPD's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan or programme, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art. 3.8, 3.9)</p>	<p>N/ A</p>	<p>Not applicable.</p>
<p>Is it likely to have a significant effect on the environment? (Art 3.5)</p>	<p>N</p>	<p>No.</p> <p>It is not likely that the SPD will have any significant effect that has not already been identified and assessed through the Sustainability Appraisal (including SEA) of the adopted Southwark Plan.</p> <p>It will provide guidance on the existing policy within the Southwark Plan.</p>

## 6. Assessment 2: Likely Significant Effects on the Environment

SEA Directive criteria and Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004	Southwark Council assessment	Likely significant environmental effect?
The characteristics of plans and programmes, having regard, in particular, to-		
The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	<p>The SPD will provide further guidance on the policies, proposals and the relevant site allocations that are contained within the Local Plan.</p> <p>The Local Plan as a whole, including those parts relating to the area and the topics covered in this SPD, have been fully assessed for the purposes of Sustainability Appraisal and the Strategic Environmental Assessment, with no additional environmental impact for consideration</p>	<b>None</b>
The degree to which the plan or programme influences other plans and programmes, including those in a hierarchy	The SPD, in providing further guidance on the framework set within the Local Plan, does not directly affect other specific public sector plans or programmes but rather is influenced by the Local Plan and other higher tier planning policy including the London Plan, which has also been subject to a SA/SEA and examined against the National Planning Policy Framework.	<b>None</b>



<p>The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development;</p>	<p>The Local Plan sets the context for achieving sustainable development, for which the SPD will provide further guidance regarding how this should be achieved.</p> <p>The guidance in the SPD is being used to promote sustainable development and environmental considerations.</p>	<p><b>Yes</b></p>
<p>Environmental problems relevant to the plan or programme; and</p>	<p>Environmental problems have already been considered in the Sustainability Appraisal associated with the Local Plan, which the guidance in this document supplements.</p> <p>No additional issues should arise, as the SPD does not create policies or site allocations.</p>	<p><b>None</b></p>
<p>The relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).</p>	<p>The SPD is not directly relevant to the implementation of any National or European legislation on the environment, such as the Water Framework Directive.</p>	<p><b>None</b></p>

<b>Characteristics of the effects and of the area likely to be affected, having particular regard to:</b>		
The probability, duration, frequency and reversibility of the effects;	<p>This SPD seeks to ensure that development across the Local Plan period makes appropriate contributions to the supporting infrastructure required to sustain the projected level of development.</p> <p>It is not anticipated the SPD will result in significant long-term adverse effects, and any social and environmental impacts are likely to be positive.</p>	<b>None</b>
The cumulative nature of the effects;	The SPD is in general conformity with the strategic policies, the implementation of which it seeks to support across the Borough. It is not considered that there will be any negative cumulative effects on the Borough overall.	<b>None</b>
The transboundary nature of the effects;	The HRA screening process found that the policies and site allocations to be adopted under the Southwark Plan 2022 will have no negative impact on the four European Sites that are located within a 10km boundary of Southwark, either alone or when considered in combination with other existing plans and projects. In light of this finding, it is not required to carry out any further HRA analysis.	<b>None</b>
The risks to human health or the environment (for example, due to accidents);	The SA and SEA conducted for the Local Plan did not identify any potential negative impacts upon human health and the environment.	<b>None</b>

<p>The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);</p>	<p>This is not an area-specific policy, but supplementary planning guidance which will apply to development across the borough. As such, it should not in itself directly result in any spatial impacts of any notable magnitude.</p> <p>The geographical area of the borough has been subject to an SA / SEA through the development of the Local Plan.</p>	<p><b>None</b></p>
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<p><b>The value and vulnerability of the area likely to be affected due to—</b></p>		
<p>(i) special natural characteristics or cultural heritage;</p>	<p>Applications for development within the borough will be assessed against relevant development policy in relation to sites of importance for cultural heritage. Southwark Council's designated heritage assets are covered by separate Local Plan and legislation. The SPD seeks a positive approach to seeking to maintain or improve the setting of these assets. No significant effects have therefore been identified.</p>	<p><b>None</b></p>
<p>(ii) exceeded environmental quality standards or limit values; or</p>	<p>The SPD seeks to support development in keeping with the principles outlined in national, London Plan and Local Plan policy guidance and the policies in the Local Plan have already been subject to SA/SEA to ensure development is sustainable.</p>	<p><b>None</b></p>
<p>(iii) intensive land-use.</p>		<p><b>None</b></p>
<p><b>Assessment 2 conclusion:</b></p>	<p>The draft Householder Development SPD <b>is not likely to have a significant detrimental impact</b> upon the environment.</p>	

## **7. Conclusion: Summary of Screening Opinion**

As a result of the Screening Assessment, it is concluded that Householder Development Supplementary Planning Document (SPD) is not likely to have significant environmental effects.

The Householder Development SPD conforms with the adopted Southwark Plan 2022 and corresponding Site Specific Allocations. The SPD provides guidance on these policies but does not create new policy. The policies and allocations therein have been subject to Strategic Environmental Assessment in their own right through the Southwark Plan 2022 Integrated Impact Assessment.

**DRAFT**

**CLIMATE AND  
ENVIRONMENT**

**SUPPLEMENTARY  
PLANNING DOCUMENT (SPD)**

# FOREWORD

Having declared a Climate Emergency in Southwark, we have focused across departments on delivering our Climate Action Plan, ensuring that we are using every tool to reduce carbon emissions and ensure that we are a borough delivering on net zero and climate resilience. Our Southwark Plan, which was agreed in 2022, includes very stretching targets on the Climate & Environment, including through our Energy Policy P60 which requires a significant reduction of operational carbon emissions through development, exceeding the requirements of the London Plan, and proposals to date around the Future Homes Standard.

This SPD provides additional guidance and best practice around implementation of our environmental sustainability policies and precedes a wider policy review of our Plan to ensure that we are line with the highest level of ambition around carbon reduction, both in operational use and through the construction process itself.



**Councillor Helen Dennis**

Cabinet Member for New Homes and Sustainable Development  
Southwark Council

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# CHAPTER 1

# INTRODUCTION

# 1. INTRODUCTION

This section provides an overview of the Climate and Environment Supplementary Planning Document. It sets out how this guidance should be used and who should be using it. It includes a summary of what is required to achieve sustainable outcomes in line with the Southwark Plan for different types of development.

## 1.1 Overview

Southwark Council declared a climate emergency in March 2019. This means that the council is aiming to do all it can to make the borough carbon neutral by 2030. The [Southwark Climate Change Strategy](#) forms part of the road map to achieving this and sets out the key priorities for the council.

This SPD provides guidance to support Southwark Plan policy 'SP6 Climate Emergency'. It does not contain new policy. The SPD will be a material consideration in the determination of a planning application. It aims to help people understand climate mitigation and adaptation actions and provides advice on how to make successful planning applications that are in line with the council's Climate policies. It also sets out best practice for sustainable development in Southwark.

This guidance provides detailed, technical guidance on each of the following topics:

- Energy and sustainability standards
- Minimising flood risk and water efficiency
- Environmental protection and improving air quality
- Green infrastructure, biodiversity and trees
- Movement and transport
- Avoiding waste and minimising landfill

Following this guidance will ensure issues are avoided or mitigated early in the planning process. It provides information on how to meet the required standards for different types of applications. Refer to our website for a list of [validation requirements](#).

## 1.2 What development does it apply to?

This SPD applies to all development of more than 1 unit that requires a planning application.

This includes:

- Fit outs and refurbishment to existing buildings
- Extensions to existing buildings
- New buildings
- Public domain works such as new or improved open space
- Landscaping works

The document applies to all types of land uses, including housing, offices, industrial development, retail, community and leisure facilities.

For guidance on how to consider climate and environmental issues as part of a householder application see the Householder SPD.

# **CHAPTER 2**

## **ENERGY & SUSTAINABILITY STANDARDS**

## 2. ENERGY & SUSTAINABILITY STANDARDS

This section provides guidance on the Southwark Plan 2022 policies ‘P69 Sustainability Standards’ and ‘P70 Energy’. Plus, the London Plan 2021 ‘SI 3 Energy Infrastructure’ and ‘SI 4 Managing Heat Risks’.

### 2.1 BREEAM

A BREEAM assessment is a certification of environmental performance in buildings. It is a well-established best practice standard with specific assessments for different types of development.

#### Thresholds for submitting a BREEAM assessment

All qualifying development (listed below) is expected to be assessed against BREEAM, using the BRE guidance to assess the project at each stage of the process. If the development does not meet the criteria set out at each stage, this should be set out in the BREEAM pre-assessment.

The BREEAM certification used will vary depending on the type of development. Applicants should use:

- For new build non-residential over 500sqm use the BREEAM for New Construction certification.
- For refurbishment over 500sqm use the BREEAM Refurbishment and Fit Out certification. Newly constructed buildings can only be assessed under BREEAM Refurbishment if fit-out works are being carried out on a new-build shell only or shell & core building.
- For minor development under 1000 sqm, a single BREEAM assessment can be done to cover both the new-build and refurbished areas. A BREEAM New Construction or BREEAM Refurbishment and Fit Out can be used, depending on what the predominant use of the assessed floor area is classed as.
- For historic buildings, use notes on compliance set out in the [BREEAM Assessment guidance on sustainable refurbishment of heritage buildings](#).

[BRE BREEAM Assessment guidance](#) provides further guidance on the different types of certifications.

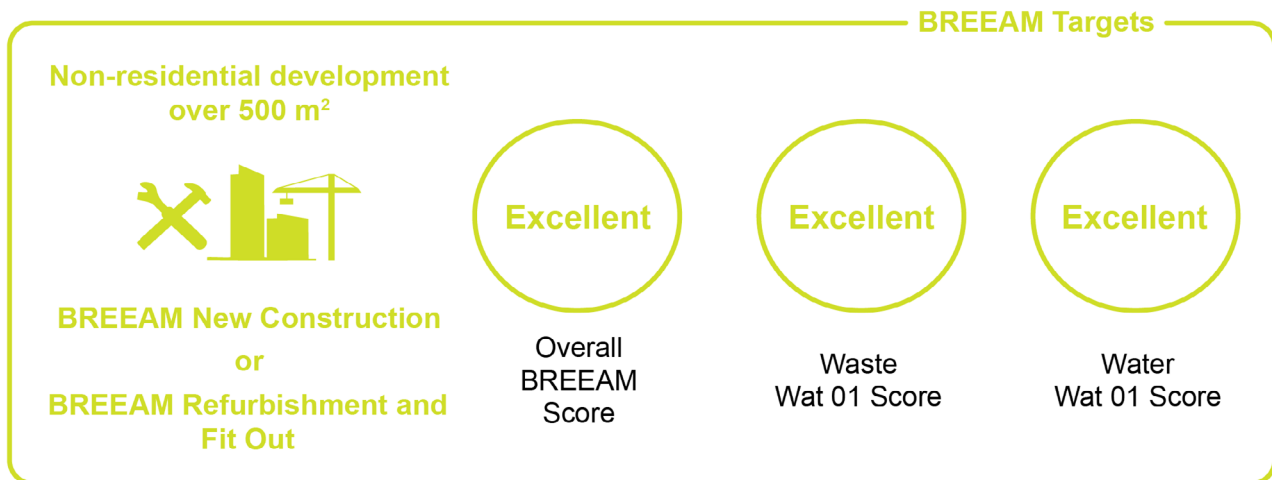


Figure 1: Infographic showing the BREEAM pre-assessment ratings required for non-residential development over 500 sqm.

### How to conduct a BREEAM assessment

There are four assessment options for BREEAM. The option selected depends on how the development is being handed over to future occupiers, i.e. either fully fitted, simple building, shell & core or shell only.

All developments should aim for fully fitted. Exceptions can be made in certain circumstances where a scheme is being handed over at a different stage. For example, if a development is mixed use and some components of the building will be occupied by different occupiers, it could include ground floor retail being fitted to one standard and the upper floors fitted to a higher standard.

A BREEAM pre-assessment should indicate which rating and credits are being targeted in line with the BREEAM methodology alongside a narrative on the design and indication of likely score. A Post-completion BREEAM assessment will need to be submitted to confirm the target approved in the decision notice and pre-assessment has been achieved before occupation of the building. This will be secured by condition.

#### Best Practice for BREEAM

Achieve a rating of 'Outstanding' in the Energy Section of the BREEAM assessment. This would be in addition to achieving Excellent overall.

Achieving 'Outstanding' scores in Wat 01 and Waste 01

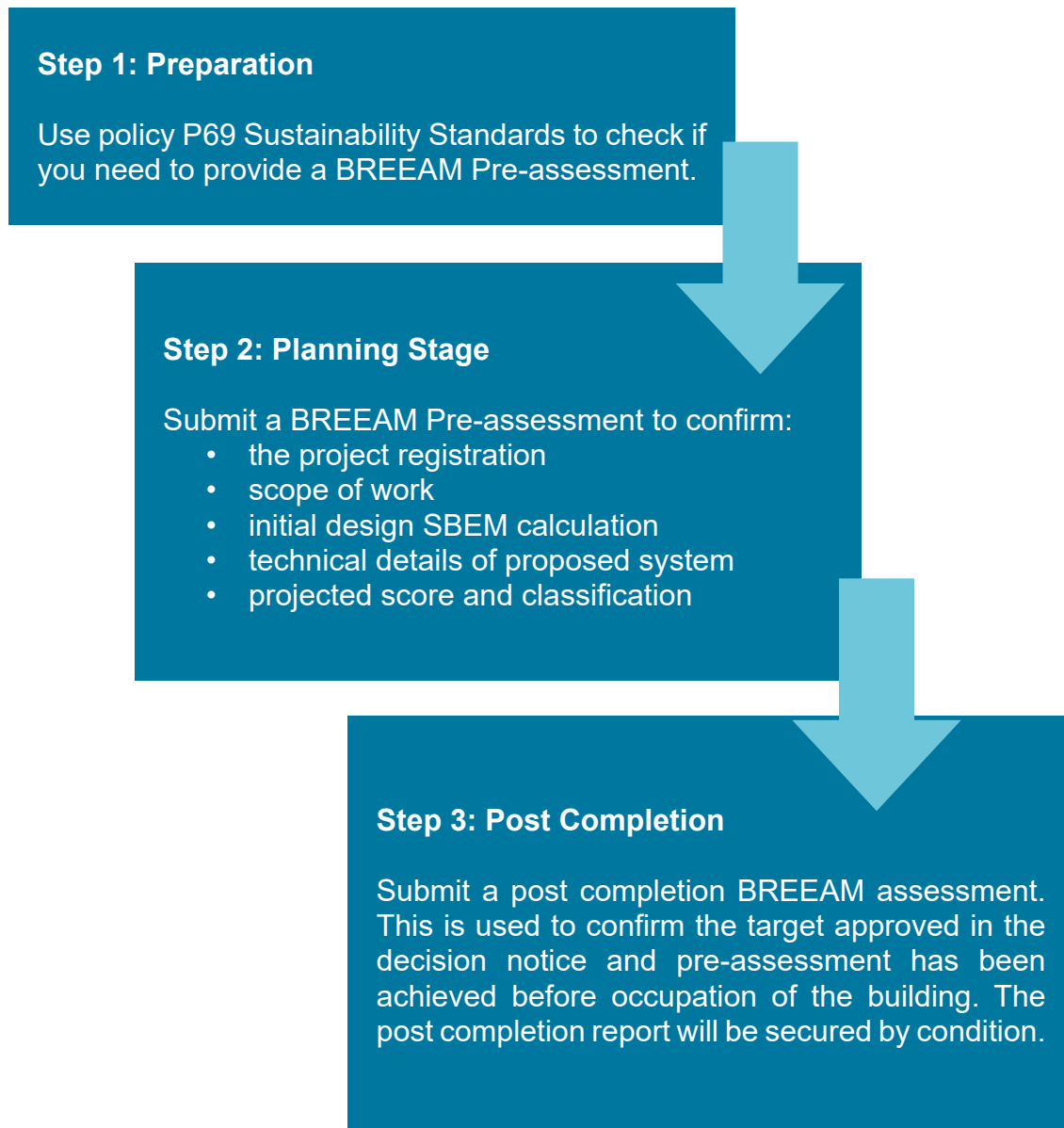


Figure 2: Flowchart showing the 3 main steps to BREEAM certification for non-residential development over 500 sqm.

## 2.2 Reducing water use

Applications should show how the water demand of the development has been reduced through water efficient design.

Developments should:

- Achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equal for commercial development.
- Achieve at least 1 BREEAM credit for water consumption for Non-residential development
- Achieve a potable water use target of 105L per person per day for Residential development.
- Include a system to collect rainwater for use in external irrigation/watering, unless this is not feasible due to site constraints.
- Use 100% metering of all new buildings.
- Use highly efficient water saving fixtures, fittings and appliances.

### Best Practice for water use

Residential development should achieve a potable water use target of 80L per person per day. To support this, some form of water recycling will be needed.

Non-residential development should achieve at least 2 BREEAM credit for water consumption.

Connect and use grey-water for all non-potable. This repurposes used water from the washing machine and shower to flush toilets and water gardens.



## 2.3 Implementing the cooling hierarchy

All development must follow the cooling hierarchy, as set out in Southwark Plan 2022 policy 'P69 Sustainability Standards'. This will help to manage heat risk through the design of a building.

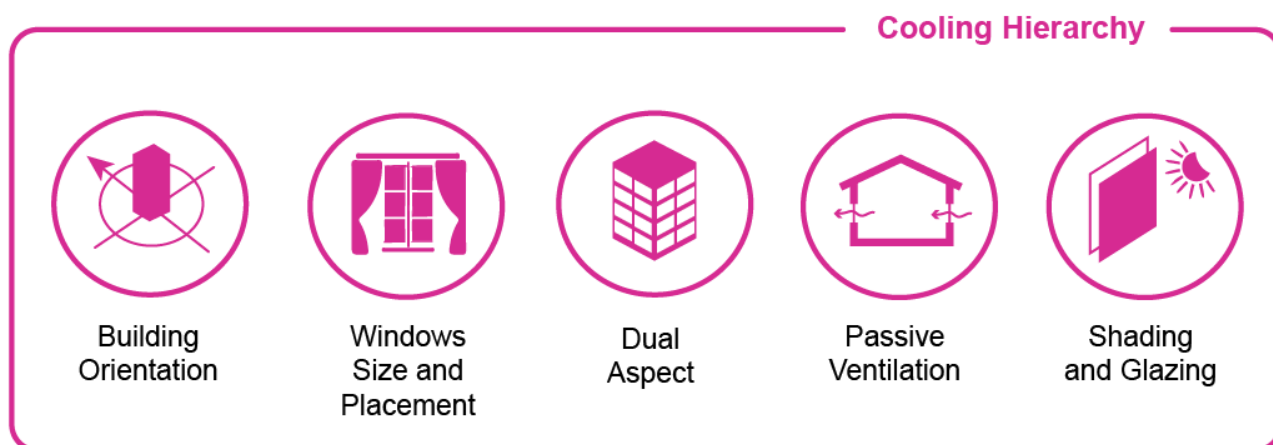


Figure 3: Infographic showing the cooling hierarchy all developments will need to follow manage heat risk through the design of a building

### 2.3.1 Step 1: Reduce heat entering a building

#### Glazing

Reducing the proportion of glazing or using solar shading can avoid overheating. G-values can be used to assess solar gains. Solar gains are a measure of how much heat is transmitted through a window from the sun's rays.

Highly glazed buildings, or a high percentage of glazing on northern elevations can contribute to heat loss in the winter. Best practice for windows is a g-value of 0.5 (for schools this can be lowered to between 0.4-0.5). Avoid tinted glass or glazing films, with g values of below 0.5 as these reduce useful solar gain in winter. If overheating is a problem, it is better to reduce the proportion of glazing or use solar shading.

Glazing ratios set out the proportion of the building wall that is glazed.

Glazing ratios should be:

- up to 25% glazed on the southern elevation
- no more than 20% on the east/west elevations
- as little as possible on the northern elevation

## Orientation

Glazing and external shadings are important to managing overheating risk in the summer. South-facing buildings usually have net heat gain. East/West windows can lead to overheating at the end of the day due to the low angle of the sun.

North-facing single aspect units should be avoided where possible as they can result in heat loss and have limited sunlight. Dual aspect properties have the best potential for cross ventilation and creating useful solar gain.

Residential buildings should:

- Orientate the largest building elevations within  $\pm 30^\circ$  of South
- Maximise number of dwellings with a main living room that has at least one window on a wall facing  $90^\circ$  due South.

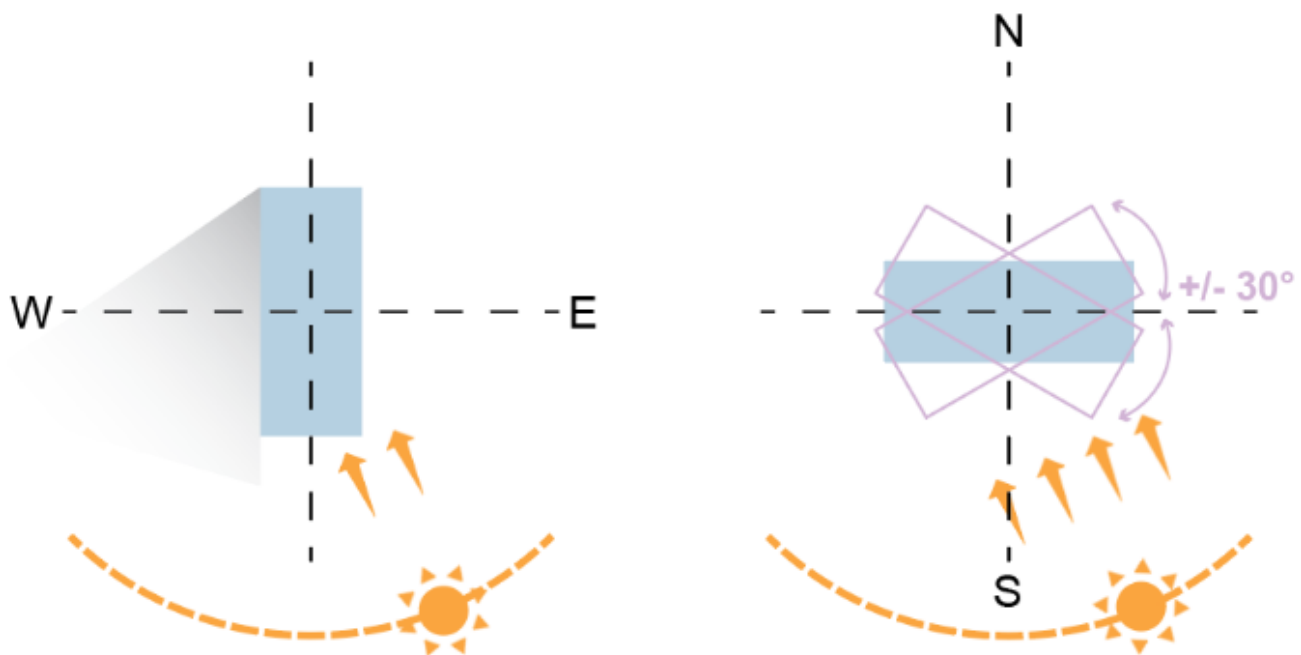


Figure 4: Diagram showing that building orientation facing  $\pm 30^\circ$  south can allow for more solar gain

## External shading

Shading is most effective when external to the window, as this keeps the glass cooler and limits transfer of heat into a room. While thermal curtains are a cost-effective option, this allows the sun to hit the glass and warm the window.

Rooms with windows facing South and West should be designed with shading materials e.g. operable external blinds, shutters. For south facing windows, window shrouds are a good option. This is because they provide some shading from the high summer sun, whilst allowing the low winter sun in.

## Form factor

The form factor is calculated by the surface to volume ratio (SVR). The SVR is the ratio between the building's envelope its volume. A more efficient form factor can reduce heat loss.

The ratio between the building's envelope area (EA) and the buildings volume (V) is calculated as:

$$\text{SVR} = \text{EA} / \text{V} \quad \text{OR} \quad \text{Total heat loss area} / \text{floor area} = \text{Form Factor}$$

A simple and compact building form is the most efficient. This allows for more consistent installation of insulation. The suggested form factors for different typologies are below:

Typology	Suggested Form Factor
Small scale housing	1.7 - 2.5
Medium and large scale housing	<0.8 - 1.5
Commercial offices	1 - 2
Schools	1 - 3

## Windows

Light-coloured materials around windows reflect daylight into buildings with overhangs or inset balconies. Using lighter materials internally can increase light.

Permeable railings can also allow light through.

## Roof

White roofs or light colours on the roof and facades helps to reflect heat. Green infrastructure can also be used to keep the building cool.

Careful modulation of wall heights and roofscape can maximise daylight and sunlight into rooms. Roof overhangs, recessed windows and other solar shading can reduce the amount of direct sunlight from high-sun angles during summer months.

### 2.3.2 Step 2: Minimising internal heat generation

Pipe lengths should be kept minimal in heat distribution infrastructure within buildings – especially for lateral pipework in corridors of apartment blocks. Pipe configurations which minimise heat loss e.g. twin pipes, should be adopted.

### 2.3.3 Step 3: Managing the heat within the building through exposed thermal mass and high ceilings

Materials with a high thermal mass e.g. concrete, bricks, rammed earth, hempcrete could be used, especially for lateral pipework in corridors of apartment blocks.

### 2.3.4 Step 4: Passive ventilation

At the earliest design stage, the potential for natural ventilation should be considered. Buildings can be naturally ventilated by wind-driven ventilation or stack ventilation.

Cross ventilation across buildings and rooms can help with temperature control by creating a draft through a room. This can be through windows, doors, vents. High openable windows/vents allow hot air to escape, and low-level windows allow cool air to enter a space.

Single sided ventilation does not allow for sufficient ventilation.

Cross ventilation with a chimney can be useful for flatted development to allow for more cross ventilation. This can also reduce the reliance and / or need for mechanical ventilation.

Successful natural ventilation is where there are a sufficient number of air changes per hour for the use of a building and the number of occupants. Part F Ventilation Building Regulation sets out how many air changes per hour are required to ventilate a building. Part O Overheating Building Regulation may require more than this to manage heating risk.

Major residential development should:

- Undertake dynamic overheating modelling in line with GLA and CIBSE Guidance using TM59 and TM49.
- Building Regulation Part O Compliance should also be considered throughout the design process.

Major non-residential should:

- Undertake dynamic overheating modelling in line with GLA and CIBSE Guidance using TM52 and TM49.

### 2.3.5 Step 5: Mechanical ventilation

Materials with a high thermal mass e.g. concrete, bricks, rammed earth, hempcrete could be used. especially for lateral pipework in corridors of apartment blocks.

Mechanical Ventilation with Heat Recovery (MVHR) units should be used if mechanical ventilation is required. These units use warm outgoing air to preheat incoming cold air through a heat exchanger. This provides ventilation while extracting and recirculating existing heat from within a building. MVHR's need a lot of electricity so the units should be highly efficient. They should be used in buildings that are very airtight to maximise their efficiency.

### 2.3.6 Step 6: Active cooling systems (ensuring they are the lowest carbon options)

Water based cooling systems run cold water through pipes in the floor and / or ceiling to cool the air.

Ground source cooling can be provided by a 'ground source heat pump'. In summer where the ground is cooler than the air, the difference in temperature can be used for cooling.

All major referable development must:

- Follow the [GLA overheating requirements](#). This includes using the Good Homes Alliance Early-Stage Overheating Risk Tool.

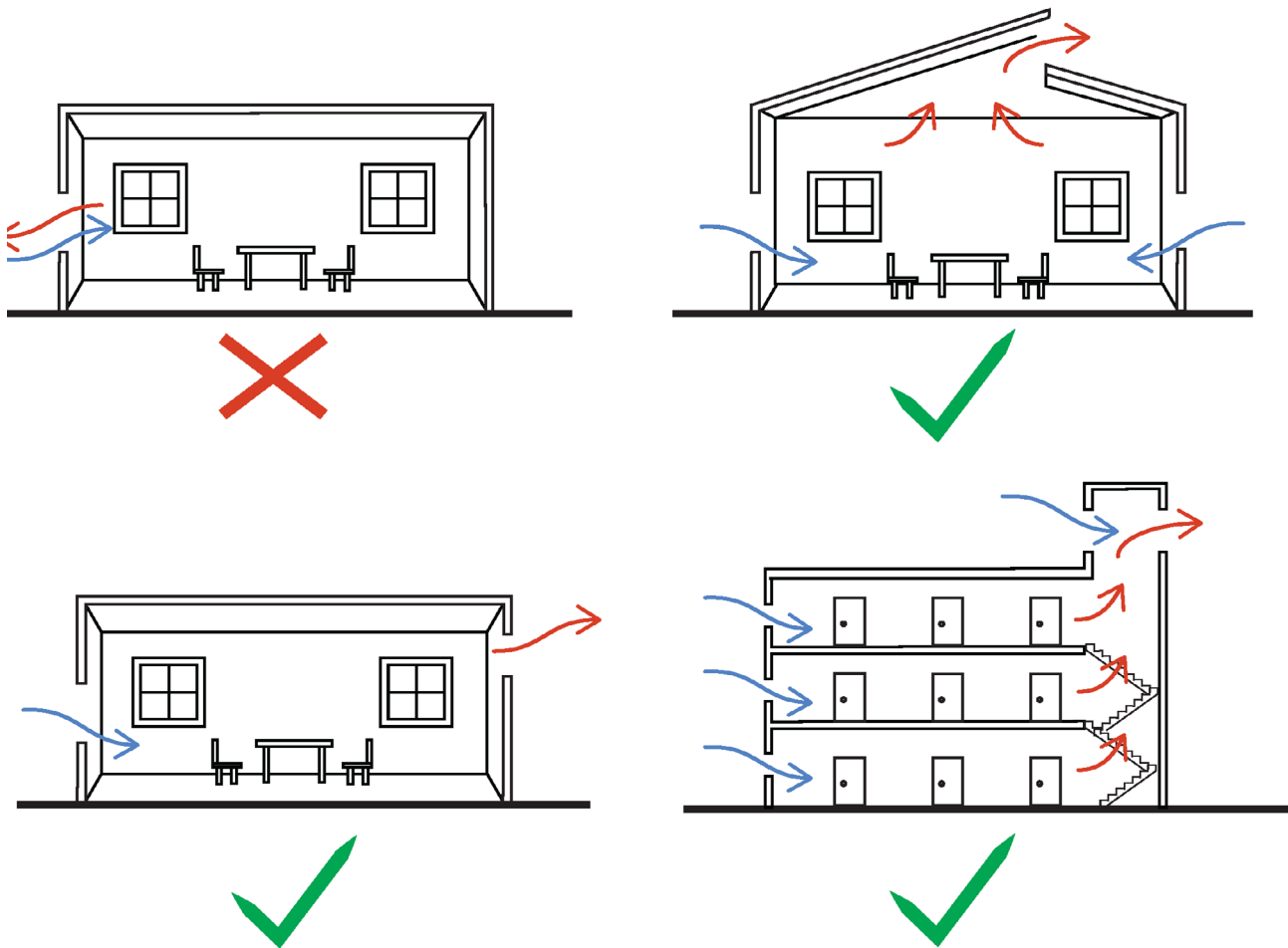


Figure 5: Diagram showing acceptable and unacceptable options for passive ventilation

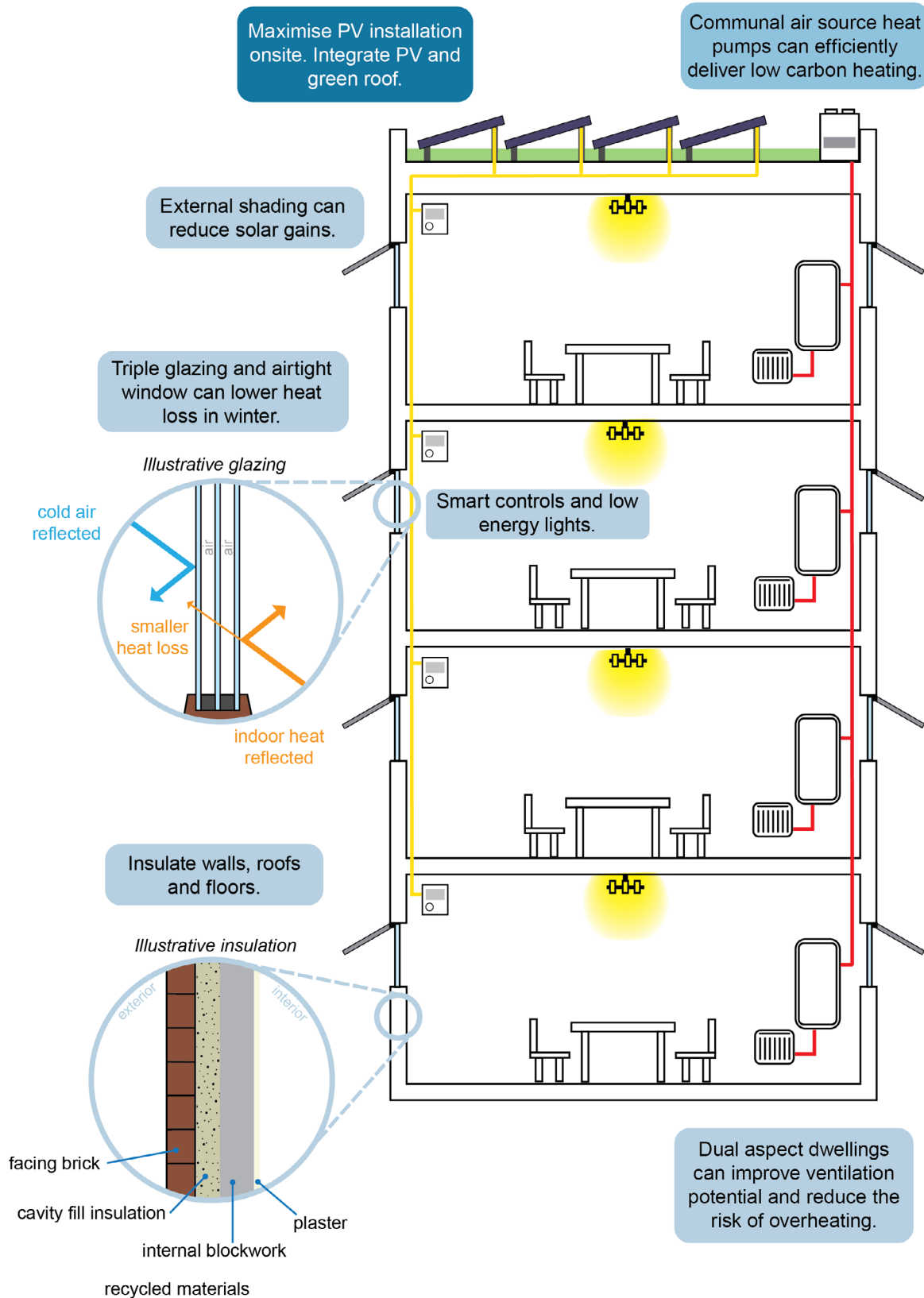


Figure 6: Diagram showing the Whole Building Approach—a list of energy options that should be implemented to achieve net zero.

## 2.4 Achieving carbon reductions in development

### Major development

Applicants of major development must show that every opportunity has been explored to reduce carbon emissions. The reduction in emissions should be set out in the energy statement and be achieved by following the energy hierarchy.

Operational net zero is currently assessed for major development against the baseline set in the Part L Building Regulation Conserving Fuel and Power. For major development, we expect an uplift on this baseline to reduce all operational regulated energy emissions to zero.

All major development that cannot reduce carbon emissions on site to zero, must pay a financial contribution to offset residual carbon emissions to reach the zero-carbon target. Applicants must show that they have worked through each stage of the energy hierarchy before they are eligible to cover the shortfall with a financial contribution.

Part L Building Regulation was updated in 2022. All schemes from January 2023 are expected to assess the percentage uplift against Part L Building Regulation 2021. Refer to the GLA guidance and Soutwark's validation checklist for further information.

### Modelling of compliance and uplift over Part L

For major development, modelling of Part L Building Regulation should be undertaken in line with the latest GLA Energy Assessment Guidance.

For major and major referable development, a TM54 analysis at RIBA Stage 2 (or at least Stage 3) is helpful to be conducted alongside Part L Modelling to better understand and evaluate the operational carbon.

### All development

All development must consider the energy hierarchy in reducing carbon emissions onsite. This should be set out in the planning statement, design and access statement or sustainability statement.

There is no requirement for a full energy assessment with an uplift over Part L for minor developments. Applicants are encouraged to carry out this assessment to understand the carbon emission implications of the development.



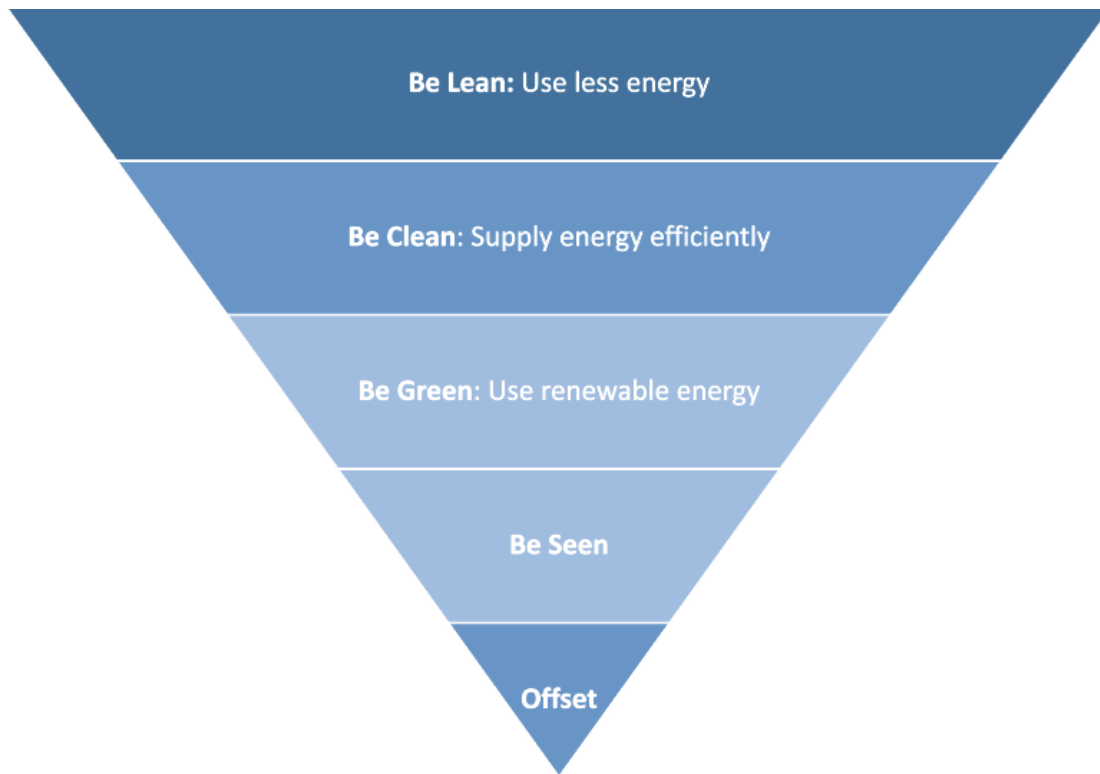


Figure 7: Energy hierarchy for major development

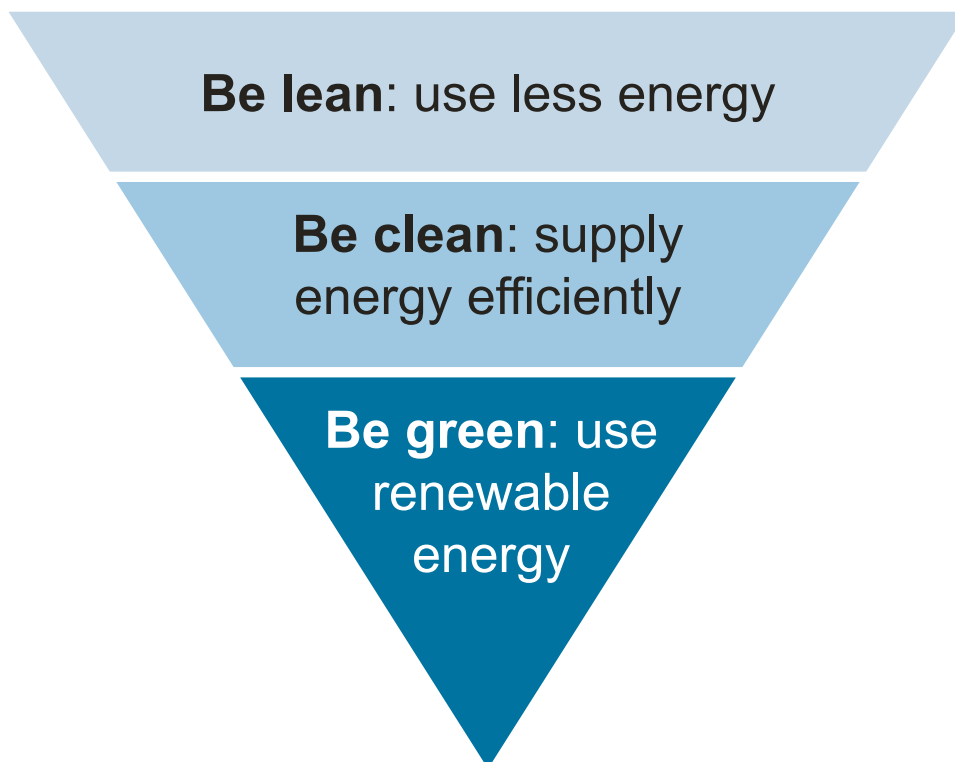


Figure 8: Energy hierarchy for all development

### 2.4.1 Applying the energy hierarchy

All development must follow the energy hierarchy, as set out in Southwark Plan 2022 policy 'P70 Energy'.

#### Be Lean – Energy efficient design and construction

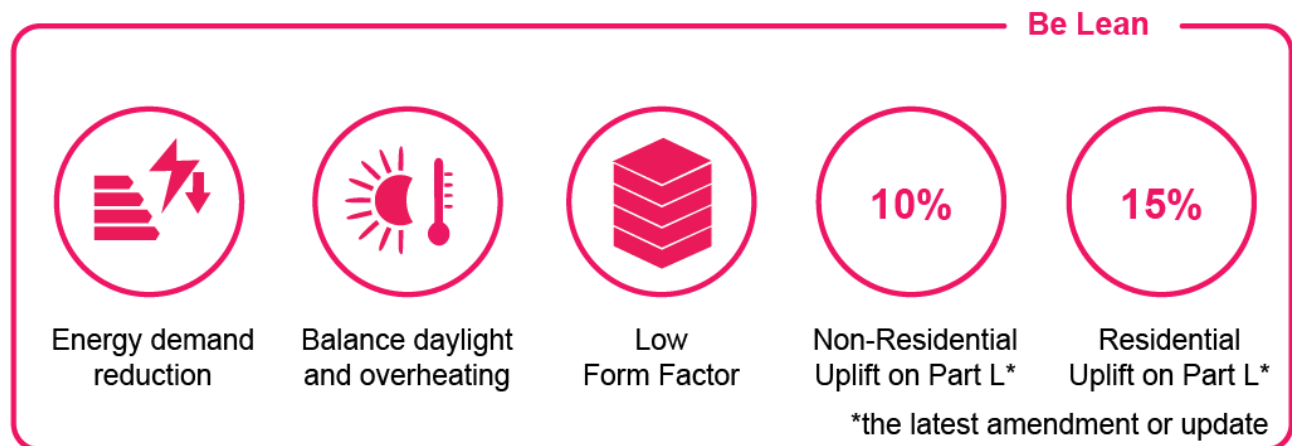


Figure 9: Infographic showing different ways that energy needs can be reduced through energy efficient design and construction; otherwise known as Be Lean.

All development should be designed to reduce energy demand. This encourages a fabric first approach where the building and materials are as efficient as possible.

This can be done by taking the following design actions:

#### 1. Primary energy:

Total energy needed for all domestic applications (heating, hot water and domestic electricity) must not exceed 60 kWh/m<sup>2</sup> of living space per year.

#### 2. Reducing energy usage:

For major developments, buildings should be designed to achieve the Energy Use Intensity (EUI) targets set out below:

a) Residential – 35 kWh/m<sup>2</sup>/year (EUI)

b) Schools – 65 kWh/m<sup>2</sup>/year (EUI)

c) Office, Hotels, Student Accommodation, and all other non-residential uses – 55 kWh/m<sup>2</sup>/year (EUI)

### 3. Space heating demand:

All major developments should be designed to achieve the space heating demand target of 15kWh/m<sup>2</sup>/year.

### 4. Thermal Comfort:

- a) Avoid complicated building forms that increase the external surface area and the heat loss of the building.
- b) Living areas should be comfortable year-round, with no more than 10 percent of the hours each year exceeding 25°C.
- c) No thermal bridging
- d) Triple glazing with Low E coatings

### 5. Air tightness:

Development should be designed for high levels of air tightness. This includes window and door seals, seals of flue whilst also balancing the need for ventilation in the right places.

### 6. Insulation:

- a) Allow for a thickness of insulation material that can achieve a conductivity of 0.04 W/m/K with additional space for structure and finishes
- b) Ensure the whole structure has been included in u-value calculations for air tightness so that the insulation is fit for purpose to achieve an airtight finish.
- c) In new buildings, walls built with cavities and insulation are effective at insulating homes<sup>1</sup>.
- d) Floors should be well insulated with thick polystyrene or polyurethane insulation.
- e) All buildings should be designed for a maximum ~10 W/m<sup>2</sup> peak heat loss (including ventilation).

---

<sup>1</sup> A wall U-value of 0.26 W m<sup>-2</sup> K<sup>-1</sup> is currently (2022) suggested by the UK Building Regulations.

Best practice for U-Values	
Typology	Suggested Fabric U-values (W/m <sup>2</sup> .K)
Small scale housing (terraced or semi-detached houses)	Walls 0.13 - 0.15 Floors 0.08 - 0.10 Roof 0.10 - 0.12 Exposed ceilings/floors 0.13 - 0.18 Windows (0.80 triple glazing) Doors 1.00
Large scale housing (four floors and above)	Walls 0.13 - 0.15 Floors 0.08 - 0.10 Roof 0.10 - 0.12 Exposed ceilings/floors 0.13 - 0.18 Windows (0.10 triple glazing) Doors 1.00
Schools	Walls 0.13 - 0.15 Floors 0.09 - 0.12 Roof 0.10 - 0.12 Windows (0.10 triple glazing) Doors 1.2
Schools	Walls 0.12 - 0.15 Floors 0.10 - 0.12 Roof 0.10 - 0.12 Windows (0.12 double glazing) Doors 1.2

Source: [LETI Climate Emergency Design Guide](#)

## Be Clean – Low carbon energy supply

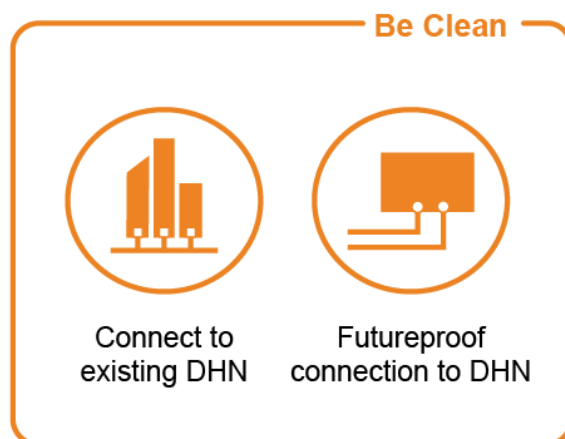


Figure 10: Infographic showing different ways that low carbon energy supplies can be implemented;

### Major development

Major developments must follow the decentralised energy hierarchy when deciding on a heat source, as set out in Southwark Plan 2022 policy 'P70 Energy'.

The hierarchy sets out the prioritisation of heat sources for major development:

1. Connect to a District Heat Network (DHN).
2. Explore connection to planned DHN.
3. Futureproof a connection to a DHN.
4. Use heat pumps (ground source, air source, water source); or
5. Use a hybrid system (gas connection with heat pump); or
6. Use electric boilers or instantaneous systems for low energy demands (e.g. domestic hot water); or
7. Create own localised DHN or implement a site-wide low carbon communal heating system; or
8. Explore and evaluate the potential to oversize the communal heating system for connection

The hierarchy is in accordance with the [GLA Energy Assessment Guidance](#), which contains further information.

Applicants must provide a whole life cost analysis if future connection to a DHN is seen to be uneconomic for end users. This analysis should compare the communal and proposed systems. Larger schemes may choose to opt for alternative heating sources such as energy clusters or batteries.

i

### Fact Box: London Heat Map

Use the [London Heat Map](#) to determine if there are feasible connections to an existing or planned DHN.

The map covers:

- Heat demand estimates for each building
- Locations of potential heat supply sites
- Locations of existing and proposed DHNs
- A user-friendly visual tool for heat network design and scenario planning
- Extent of London Heat Network Priority Area

### Connecting to an existing heat network

A development must connect to a District Heat Network (DHN) where possible. Connecting to an existing DHN will form part of the 'Be Clean' percentage reduction against Part L Building Regulation. The DHN must not exceed the CO<sub>2</sub> emission and primary energy factors set out in Part L 2021. The DHN must also be low carbon.

The applicant must provide confirmation that the network operator has capacity to serve the development, or that the network operator is willing to expand the capacity of the network to support it. This must be set out in the energy statement alongside timescales for connection.

Any additional impact on air quality from an increase in DHN capacity or usage should be considered.

### Connecting to a planned or future heat network

If a scheme cannot connect to an existing heat network, it must utilise other low carbon heat sources.

A scheme must futureproof a connection to a DHN if it is within the London Heat Network Priority Area. The connection should not be included in the 'Be Clean' calculations as it is only futureproofed. Futureproofing ensures that developments are adaptable and take account of expected future changes.

Futureproofing a development for connection to a DHN requires:

- A single energy centre supplying the site, where all energy generating equipment is located. This could be a communal system with a single point of connection, served by a single energy centre for the entire site which connects all buildings. This will help to facilitate future connection to an area wide DHN and can be less costly than retrofitting the site for connection at a later stage.
- The energy centre to have capacity for connection to an area wide DHN.
- Sufficient space for specified equipment and any additional equipment that may need to be installed in the future.

### Phased developments

Developments that will be delivered in phases should seek to create one energy centre large enough for the entire site. An energy assessment providing a simple schematic of the communal heat network and all development uses connected into it must be provided. This should also include the location of the energy centre.

Where the applicant can provide evidence that a single energy centre is not possible, they must seek to reduce the number of centres. They must also explain how the network will evolve across the development's phasing programme.

### Be Green – on site renewable energy generation and storage

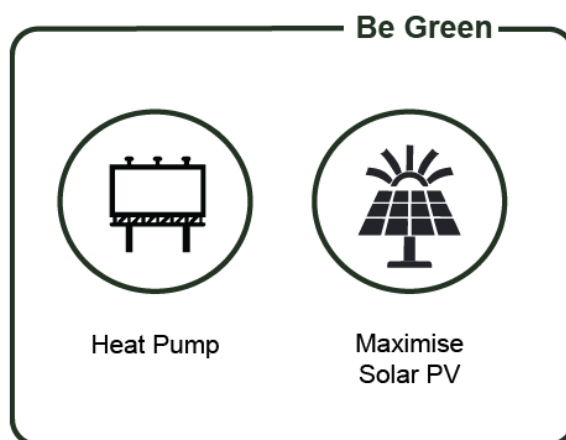


Figure 11: Infographic showing different ways that on site renewable energy generation and storage can be implemented

## Major development

All major development must assess options for the use of renewable energy generation onsite. This needs to show how opportunities to produce, store and use renewable energy on-site have been maximised. This should be set out in the energy assessment.

## All development

### *Photovoltaic panels (PV)*

All development must consider how to optimise the electricity generation of PVs.

This includes a consideration of:

- Angle
- Orientation
- Roof placement
- Overshadowing (due to existing/future buildings, trees or structures)

South-facing and flat roofs are the most beneficial for solar photovoltaics, or whichever design is most suitable to maximise renewable energy generation.

The [GLA Energy Assessment Guidance](#) includes further information in relation to assessing PVs.

<b>Best practice for PVs</b>				
All development	Minor development	Major (Residential)	Major (Offices)	Major (all other non-residential)
Consider the embodied carbon in PV. For example, how far the PV has been transported, or considering alternatives to PV such as PV tiles etc.	Maximise renewables so that 100% of annual energy requirement is generated on-site.	Maximise renewables so that 70% of the roof is covered with PV.	Maximise renewables to generate the annual energy requirement for at least two floors of the development on-site.	All major development proposals to maximise on-site renewable energy generation.



### *Low carbon heat*

The following design actions should be taken.

#### **Residential Development**

- Reduce heating and hot water peak demand
- Active demand response measures
- Install heating set point control and thermal storage
- Electricity generation and storage
  - Consider battery storage
- Electric vehicle (EV) charging
  - Electric vehicles turn down
- Behaviour change
  - Incentives to reduce power consumption and peak grid constraints

#### **Non-Residential Development**

- Peak reduction demand
- Reduce heating and hot water peak energy demand
- Active demand response measures
- Install heating and cooling set point control
- Reduce lighting, ventilation and small power energy consumption
- Electricity generation and storage
  - Consider battery storage
- Electric vehicle (EV) charging
  - Electric vehicle turn down
  - Reverse charging EV technology
- Behaviour change
  - Incentives to reduce power consumption and peak grid constraints.
  - Encourage responsible occupancy

Best practice for low carbon heat		
All Development	Minor Development	Major Development
<ul style="list-style-type: none"> <li>Gas boilers should be replaced with heat pumps, or a connection to a low carbon network</li> <li>No new gas boilers</li> <li>No fossil fuels onsite</li> </ul>	<ul style="list-style-type: none"> <li>Connection to a communal heat source depending on feasibility. The heat source should be low carbon</li> </ul>	<ul style="list-style-type: none"> <li>Encouraging 'energy clusters' on major or strategic schemes. This is where multiple renewable sources (e.g. DHN connection and PV and a battery) are used</li> <li>Limit the dependency on fossil fuels for heat generation for peak demand</li> </ul>

Best practice for heat pumps
<p><u>All development</u></p> <p>Utilise a heat pump for low carbon heat, after improving the energy efficiency and fabric efficiency using the energy hierarchy.</p> <p>Heat pump enclosures and acoustic screening can be used to reduce the noise generated from heat pumps. Heat pumps should not increase background noise above 10dB. A noise impact assessment should be undertaken to assess the need for enclosures and acoustic screening.</p> <p><u>Major development</u></p> <p>Where heat pumps are proposed, a high specification of energy efficiency will be expected to ensure the system operates efficiently and reduces peak electricity demand. This applies to any type of heat pump proposal including air source heat pumps (ASHPs), ground source heat pumps (GSHPs), water source heat pumps (WSHPs) or hybrid and ambient loop types of systems.</p> <p>For full details on the require information in an Energy Assessments for Heat Pumps, refer to the GLA Energy Assessment Guidance.</p>

## 2.4.2 Monitoring - Major Applications

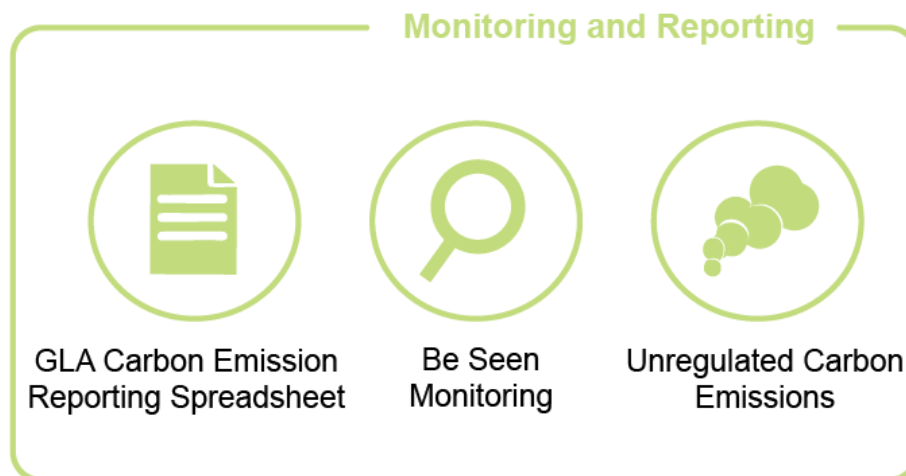


Figure 12: Infographic showing different ways through which operational energy performance is monitored;

The Energy and Environment Pro-Forma submitted at planning stage will ensure consistent data collection, monitoring and reporting.

Along with the Energy and Environment Pro-Forma, major development will need to provide the [GLA Carbon Emission Reporting Spreadsheet](#).

See the S106 & CIL SPD and validation checklist for full monitoring requirements.

### Post completion monitoring Be Seen

The requirement for post completion monitoring is secured by S106 agreement. Information must be submitted to the GLA Be Seen Portal. Refer to the S106 SPD for further information.

This monitoring process from planning stage to post completion and in-use stage ensures that the gap between what is consented and what is built is monitored and mitigated against. This is called the Performance Gap. The Be Seen monitoring requirements address the performance gap.

### Unregulated carbon emissions

The Part L Building Regulation compliance and uplift percentage are based on modelling which includes only regulated emissions.

Unregulated CO<sub>2</sub> emissions are those which are produced from unregulated loads within a building. This is typically related to cooking and electrical appliances, as well as other small power. Current Building Regulations do not impose a requirement to report such emissions and instead focus solely on regulated emissions.

The calculation of unregulated carbon emissions should be done as part of the compliance with the 'Be Seen' policy and associated guidance.

The latest [GLA Be Seen Monitoring Guidance](#) for major development provides further information on reporting unregulated carbon emissions and energy.

All major development must report the unregulated emissions through EUI targets, alongside regulated carbon emissions. This information should also be provided in the GLA Carbon Emission Spreadsheet at the planning stage.

### Unregulated carbon emissions

The Part L Building Regulation compliance and uplift percentage are based on modelling which includes only regulated emissions.

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The latest [GLA Be Seen Monitoring Guidance](#) for major development provides further information on reporting unregulated carbon emissions and energy.

All major development must report the unregulated emissions through EUI targets, alongside regulated carbon emissions. This information should also be provided in the GLA Carbon Emission Spreadsheet at the planning stage.

### 2.4.3 Carbon offsetting – Major applications

Developments should be designed to the highest performance standards using the stages outlined in the energy hierarchy.

This is to minimise the carbon emissions which are required to be offset from the development. See the S106 & CIL SPD for more information on how the offset is calculated and used.

### 2.4.4 Whole Life-Cycle Carbon (WLC)

Whole Life-Cycle Carbon (WLC) includes embodied carbon and operational carbon. The purpose of using WLC carbon is to move towards constructing buildings that generate the lowest carbon emissions over their whole lifespan.

Development is required to consider how upfront embodied carbon in existing buildings onsite can be utilised. Embodied carbon should also be considered in decision-making to reduce operational in-use carbon.

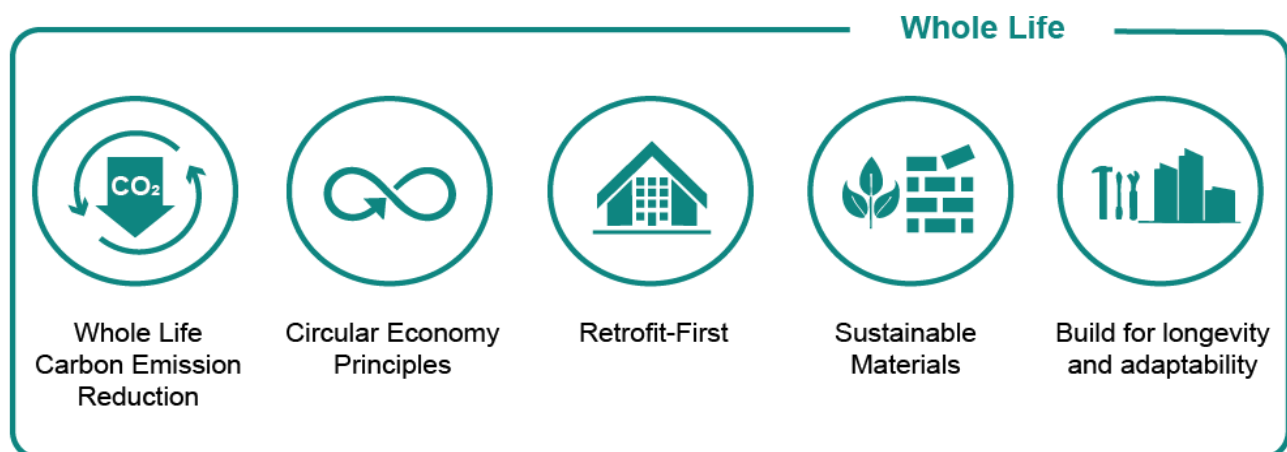


Figure 13: Infographic showing whole life carbon principles

#### Major referable

The London Plan states a WLC assessment should be submitted for major referable schemes.

The assessment should be submitted at the following stages:

- Pre-application (where relevant)
- Planning application submission (i.e. RIBA stage 2/3)
- Post-construction (i.e. prior to occupation of the development. Generally, it would not be expected that the assessment would be received three months post-construction)

The [template](#) is available on Southwark's validation checklist. Follow the methodology as set out in the [GLA WLC Guidance](#).

WLCAs and Circular Economy Statements are interrelated. It is important to make sure the two documents correlate.

The benchmarks set out in Appendix 2 of the GLA WLCA guidance. Where the benchmarks cannot and have not been met, justification should be set out in the WLC Assessment template spreadsheet.

Selecting a typology to use as a benchmark should be based on the most prominent land use in a development. Where there is not a specific typology for a scheme, the applicant must select the one most similar to their development, i.e. the use of the majority floorspace. Student accommodation schemes should be assessed as residential.

<b>Best practice for Whole Life Carbon</b>			
All Development	Minor Development	Major Development	Major referable
<p>At early design stages, the design should consider:</p> <ul style="list-style-type: none"> <li>Retention of structural elements or high impact building layer</li> <li>Re-use of existing elements</li> <li>Massing optimisation of new elements</li> <li>Recycling of existing materials on and offsite</li> <li>Designing for longevity and flexibility to extend the life of the building</li> </ul>	<p>Evidence of WLC consideration at the planning stage in the planning statement or design and access statement</p>	<p>Evidence of WLC consideration at the planning stage in the energy statement.</p>	<p>Development should aim to meet the aspirational benchmarks as set out by the GLA.</p> <p>Applicants are also encouraged to use the LETI 2020 and 2030 embodied carbon targets for upfront carbon modules A1-A2, as well as the RIBA 2030 embodied targets.</p> <p>Design actions could be:</p> <ul style="list-style-type: none"> <li>Re-use materials on site, adapt existing buildings and structures.</li> <li>Assess the embodied carbon implications of operational carbon improvements and reduce the embodied carbon of these measures.</li> <li>To select low-carbon materials with a long life expectancy.</li> <li>Minimise operational carbon through a fabric first approach.</li> <li>Design for flexibility and longevity, considering the future disassembly and reuse of the building site.</li> <li>Use locally sourced materials.</li> <li>Utilise efficient and lightweight construction methods.</li> </ul>

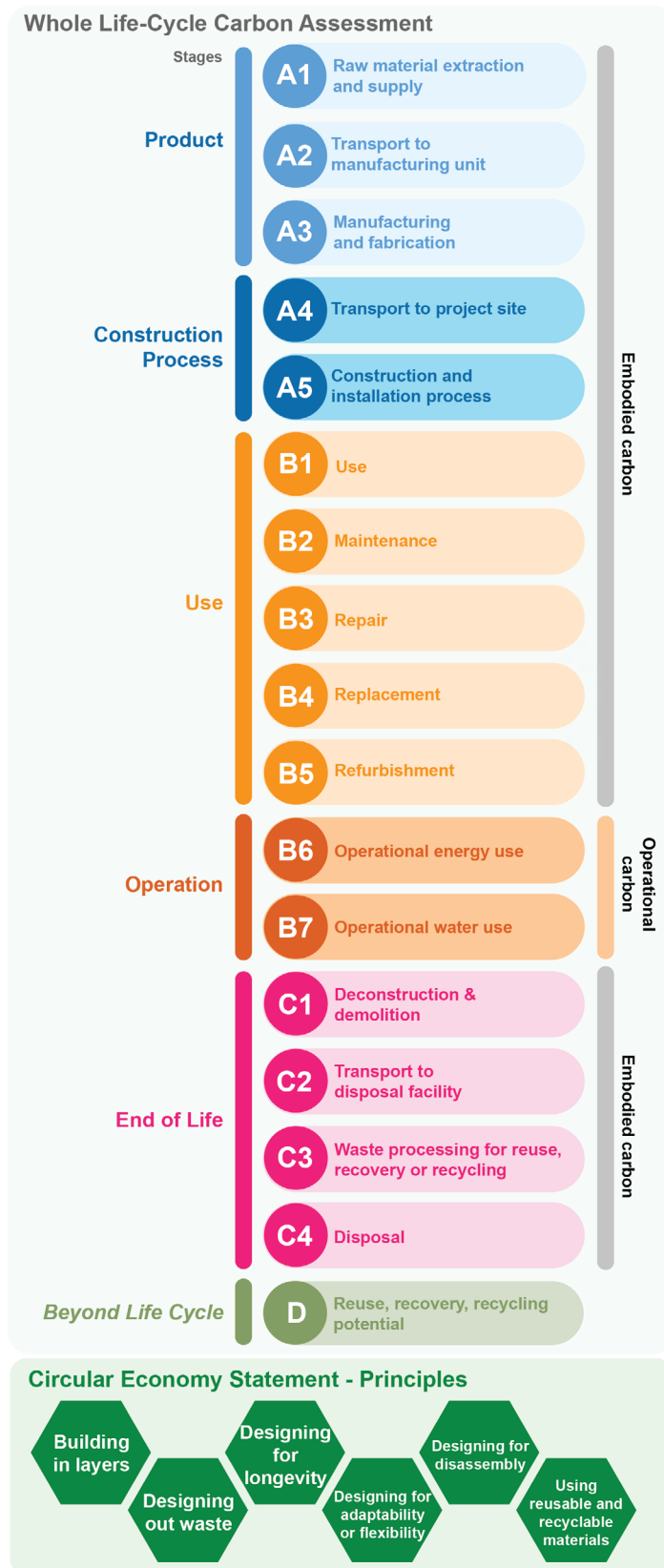


Figure 14: Diagram showing how a whole life cycle carbon assessment (WLCA) is calculated

### 2.4.5 Circular Economy (CE) statements

Southwark Plan 2022 policy 'P62 Reducing waste' and London Plan 2021 policy 'SI 7 Reducing waste' and supporting the circular economy set out the policy requirements for Circular Economy (CE) Statements.

These statements only apply to major referable planning applications.

Complete the CE Statement in line with [GLA Circular Economy Guidance](#).

Circular Economy Statements are required to be submitted at the following stages:

- pre-application (where relevant)
- planning application submission (both outline and detailed)
- post-construction (i.e. upon commencement of RIBA Stage 6 and prior to the building being handed over. Generally, the assessment would happen no more than three months post-construction). Any changes in design following the submission should be accounted for in the post-construction statement.

The CE Statement consists of a written report and a spreadsheet, with the relevant tab(s) filled in at each stage. Applicants should also submit a written statement to support the spreadsheet. This should provide further explanation, calculation, and supporting evidence. The Project Details section can set out if an application has more than one building and/or circular economy approach.

The [Circular Economy Guidance](#) sets out more information on what needs to be submitted at each stage.



Best practice for Circular Economy Statements			
All Development	Major referable	Major referable with clear site	Major referable with existing building onsite
<p>Consider circular economy principles in the demolition, construction and de-construction of buildings by reducing, reusing, and recycling materials.</p>	<p>Utilise CE Statements to assess which approach to retrofitting and refurbishment is appropriate. Maximising opportunities for material reuse and innovative practice. Exceed the targets for recycled materials and diversion of waste from landfill.</p> <p>A pre-demolition audit should be produced at the pre-application stage to inform design decisions around whole life cycle carbon emission reduction and addressing circular economy principles.</p> <p>The best practice CE Statements are 'pioneering'. The <a href="#">GLA Circular Economy Guidance</a> sets out more information on this.</p> <p>For best practice Post Construction Stage Reporting, analysis could be included of structural issues that have to be addressed, and ideas or suggested solutions provided.</p>	<p>Where the site is cleared, the starting point for redevelopment should be to assess what can be reused from the site, materials or elements available on the site.</p> <p>Where it is technically possible and viable to recover these materials, then these materials should be deconstructed and reused. Where these materials cannot be, these should be demolished and recycled.</p>	<p>Where there is an existing building onsite, the starting point for redevelopment should be assessing what can be retained of the existing building.</p> <p>To utilise embodied carbon in the existing buildings, the existing building should be retained and refurbished where it is suited to the new use and requirements, where it is no, the building should be repurposed.</p>

## 2.4.6 Retrofitting

Southwark Plan 2022 policy ‘P70 Energy’ and London Plan 2021 Policy ‘SI 7 Reducing waste and supporting the circular economy’ set out the policy considerations for retrofitting.

The following design actions should be considered when looking at the planning application stage:

All Development	Major Development	Major referable Development
<p>Retrofit should take a fabric first approach. First reducing energy consumption and improving air tightness to improve energy efficiency.</p> <p>The key components of successful retrofit are:</p> <ul style="list-style-type: none"> <li>• Energy demand reduction</li> <li>• Improved occupant and building health</li> <li>• Long term maintenance plan</li> <li>• Whole Building Retrofit Plan (including lifespan of different building elements)</li> <li>• Measure and report on energy use and heating demand of the building throughout its life</li> <li>• Be innovative in design and approach</li> <li>• Consider WLC emission implications of decisions, especially upfront embodied carbon</li> </ul>	<ul style="list-style-type: none"> <li>• Design should consider embodied carbon emission reduction.</li> <li>• Embodied and operational carbon should be weighed up in decisions. Provide evidence and full justification to show this trade off.</li> </ul>	<ul style="list-style-type: none"> <li>• Use Circular Economy Statements to assess how existing materials onsite can be re-used or recycled. This includes whole buildings and structures. Circular Economy Statements can be helpful in the assessment of demolition instead of retrofitting.</li> <li>• Use the WLCAs to achieve the benchmarks for the most relevant development type.</li> <li>• In line with GLA Guidance, design decisions should assess the embodied and operational carbon.</li> <li>• Balance the embodied carbon cost of design decisions to improve operational carbon savings.</li> </ul>

## Best practice for retrofitting

A Whole Buildings approach to retrofitting is considered best practice. A Whole Buildings approach should consider the lifespan of each building component and how it can be retained, improved or recycled and re-used to reduce WLC emissions.

A Whole Building Retrofit Plan should include:

1. Set out key building information, constraints, risks, and opportunities.
2. Set out the key works proposed along with related strategies and details.
3. Set out the sequence of work.
4. Be appropriate in the plan's level of detail and intervention for the project.
5. Include a plan for monitoring and reporting energy consumption.
6. The plan should stay with the building and be passed on from owner to owner.

The energy hierarchy can be applied to retrofitting as set out below:

Be Lean	<p>Remove fossil fuel heat sources and replace with low carbon alternatives. For example: Heat Pumps.</p> <p>Install insulation – this may vary in different contexts but some opportunities to install insulation are in:</p> <ul style="list-style-type: none"> <li>• Solid and cavity wall</li> <li>• Roof/loft</li> <li>• Under floor</li> <li>• Pipework</li> <li>• Glazing for windows and doors</li> <li>• Draught proofing</li> <li>• Living roofs</li> </ul> <p>Air tightness should be improved including triple glazing</p> <p>Design for passive ventilation where possible, before mechanical ventilation is considered.</p> <p>Upgrade to lower LED lighting</p> <p>EUI of 50 kWh/m<sup>2</sup>/yr</p> <p>Space Heating Demand of 50 kWh/m<sup>2</sup>/yr</p> <p>Hot water demand target of 20 kWh/m<sup>2</sup>/yr including additional allowance for homes &lt;75m<sup>3</sup> (+5 kWh/m<sup>2</sup>/yr)</p> <p>Reduce the space heating demand and EUI as far as is practicable for the building/situation.</p>
Be Clean	<p>For major development, schemes should still utilise the decentralised energy hierarchy to assess the feasibility of a DHN to supply decentralised low carbon heat.</p> <p>Schemes not able to utilise an existing heat network for connection should still follow the process set out previously to futureproof a connection to the DHN.</p>
Be Green	<p>Development should maximise renewables onsite, aiming for around 40% of roof area covered in PV panels. An integrated green roof with solar panels is considered best practice.</p> <p>For minor schemes, solar battery storage is encouraged, where the renewable energy generation exceeds the energy demand onsite.</p>

# **CHAPTER 3**

## **MINIMISING FLOOD RISK**

## 3. MINIMISING FLOOD RISK

This section provides guidance on Southwark Plan 2022 policy 'P68 Reducing flood risk'. It also relates to London Plan 2021 policies 'SI 12 Flood risk management' and 'SI 13 Sustainable drainage'.

### 3.1 Sequential and exception test

If required, the sequential test and exception test should be submitted alongside the Flood Risk Assessment as part of a planning application.

#### 3.1.1 Sequential test

Developments that meet both of the following criteria must submit a sequential test:

- Located in flood zone 2 or 3
- A sequential test has not been completed for the proposed development type on the site previously

The sequential test aims to steer new development to areas with the lowest risk of flooding. It is a sequential, risk-based approach. It takes all sources of flood risk and climate change into account. The proposed development site will be compared with other available sites to find out which has the lowest flood risk. It may not be possible to find other comparable development sites in low-risk areas.

In this case, the sequential test should compare reasonably available sites:

- Within medium risk areas; and
- Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.

It may also be useful to consider flood risk management infrastructure. This can impact the level of risk within high and medium flood risk areas. Parts of Southwark (mostly in the north) are within the River Thames flood catchment area and benefit from significant tidal defence infrastructure.

### 3.1.2 Exception test

The exception test shows how flood risk will be managed on the proposed site. It needs to show how the sustainability benefits of the development to the community outweigh the flood risk.

The exception test may be required depending on the outcome of the Sequential test and the potential vulnerability of the site and the development. This is judged against the [NPPF Flood Risk Vulnerability Classifications](#).

## 3.2 Site-specific Flood Risk Assessment

Developments that meet any of the following criteria must submit a site-specific flood risk assessment:

- Located in flood zone 2 or 3
- Sites of more than one hectare
- Basement extensions

Major applications in Critical Drainage Areas for surface water flooding

Located in flood zone 1 where there is a critical drainage problem as notified by the Environment Agency.

This must be submitted with a planning application. Applicants must show that suitable sites are not available in an area with a lower risk of flooding (i.e., that the development meets the Sequential Test).

Applicants must also show that the development will not increase flood risk for surrounding buildings. A flood exceedance flow diagram or drawing should be provided to demonstrate this.

## 3.3 Development in flood risk areas

Development in flood risk areas will need to be made safe from flooding through the site layout and design of the building.

This can be achieved by, but is not limited to;

- Locating the most vulnerable uses on upper levels or in lower risk areas
- Ensuring buildings do not block key flood routes
- Raising floor levels

It is preferable that less vulnerable uses (such as shops, offices and leisure facilities) are located at ground floor level. Basements should generally be avoided or used for storage, servicing or parking purposes only. Sleeping areas should not be located below the predicted 1 in 200 year flood level.

Finished floor levels should be set no lower than 300mm above the predicted maximum water level where they are located within an area at risk of flooding.

The approach taken will depend on the amount and speed of water likely to pass through a site during a flood event and how long it will remain. Where a low level of flooding is expected, measures to make a building flood resistant may be appropriate. Where higher levels of flooding are expected, a building will need to be made flood resilient.

#### **Best Practice for flood resilient design**

Flood resilient design can reduce the damage from water entering a building. This should be factored into developments in addition to flood resistant design. This will limit damage if flood resistant design measures fail. This is important since flood resistance cannot be guaranteed.

### **3.4 Basement Impact Assessments**

A Basement Impact Assessment (BIA) may be required as part of your planning application. This depends on the size of the basement and whether the application falls within a high flood risk area. The council should be consulted prior to planning submission to determine whether a BIA will be required. In general, a BIA will be required when a proposed development includes a new or extended basement.

When a BIA is required, this should be specific to the site and the proposed development. The assessment will depend on the scale, location and complexity of the scheme. A screening exercise should be undertaken to determine the level of detail required. The stages of the BIA should include screening, scoping, site investigation and study (as required). It should conclude with the final impact assessment.

The Basement and Flooding Guide for Developers sets out more information on this, including what should be assessed.

### 3.5 Sustainable Drainage Systems (SuDS)

Sustainable Drainage Systems (SuDS) describes methods which manage surface water drainage in a way that mimics the [natural process](#). SuDS help to slow the flow of water leaving a site by providing attenuation.

SuDS can also provide broader benefits such as providing greenspace for wildlife improving biodiversity. Other benefits include the capture and re-use of site runoff (rainwater harvesting) for irrigation and non-potable uses.

To manage surface water as part of a new development, applicants should follow the guidance below.

Major Development	Minor Development
<ul style="list-style-type: none"> <li>• Use water-sensitive urban design and SuDS. This should bring surface water runoff down to greenfield runoff rates.</li> <li>• Applicants must show how they have followed the drainage hierarchy as set out in London Plan Policy SI 13 Sustainable drainage.</li> <li>• Underground attenuation systems or sewer discharge should be a last resort. Infiltration, discharging via a watercourse, and above ground attenuation are preferred.</li> <li>• An overview of common types of SuDS measures that may be suitable for installation within Southwark is included in Appendix B of the SFRA.</li> <li>• Applicants must complete and submit the council's <a href="#">Sustainable drainage systems (SuDS) proforma</a>. This sets out how SuDS will be implemented on the development site.</li> </ul>	<ul style="list-style-type: none"> <li>• Development should not increase surface run-off leaving the site (measured in litres per second per hectare) at peak times. This should be controlled so that it is the same for all storms expected in a 1 in 100 year period.</li> <li>• Development should not increase the area of non-permeable areas.</li> <li>• Drainage must meet the minimum requirements of Part H of the Building Regulations.</li> <li>• Where a flood risk assessment is not required, information on how a development has been designed to manage surface water should be included in the Design and Access Statement.</li> <li>• Drainage should be designed not to flood for the 1 in 30 year return period</li> </ul>



## Best Practice for SuDs

If designed well, SuDS can have multiple benefits for a development. This includes helping to achieve Biodiversity Net Gain (BNG) and sustain greening and enhancing site design and character.

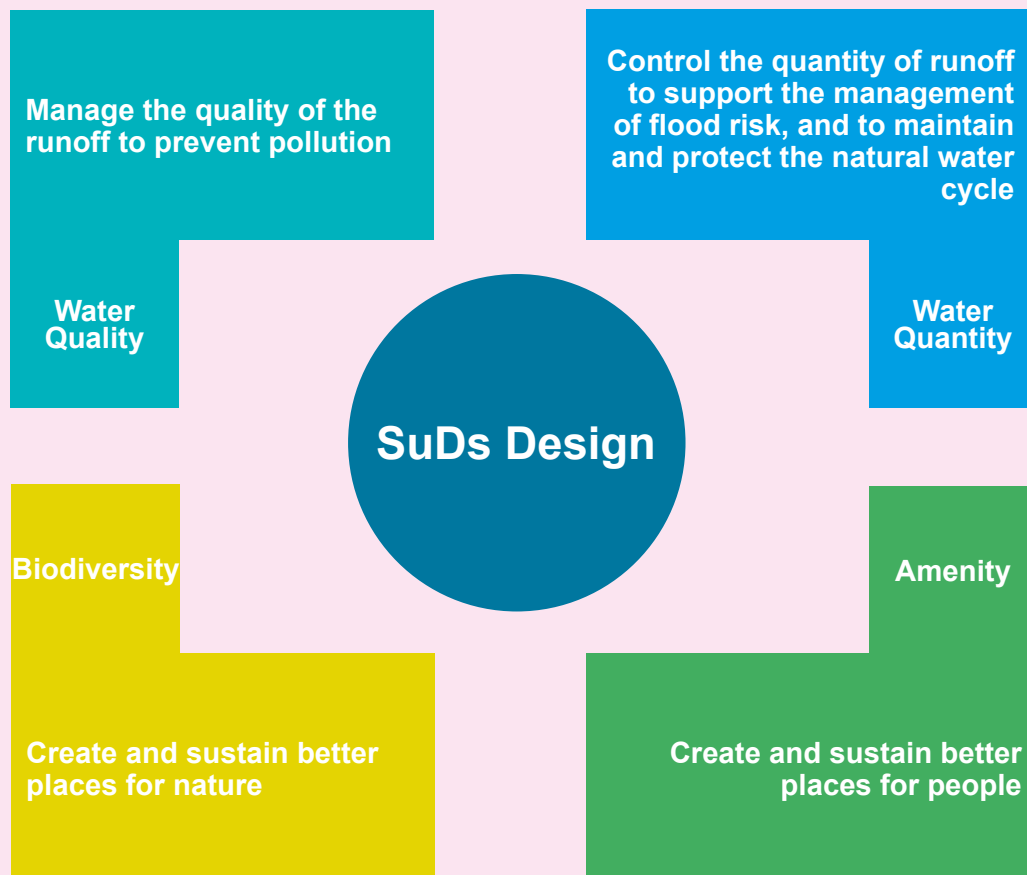


Figure 15: Diagram showing the benefits of Sustainable drainage systems (SuDS) (Source: CIRIA SuDS Manual)

### 3.6 Vulnerability classifications

The [NPPF](#) explains how some land uses are more vulnerable to flooding than others. More vulnerable uses should be directed to areas of lower flood risk.

Uses that are highly vulnerable if a flood occurs include:

- Buildings that will be occupied by the emergency services;
- Telecommunications installations;
- Basement dwellings;
- Caravans and mobile homes intended for permanent residential use; and
- Installations requiring hazardous substances consent.

### 3.7 Finished floor levels

Flood risk can be mitigated by ensuring habitable floor levels are raised above the maximum flood water level.

Floor levels should be raised by the following recommended amounts, as a minimum:

- In areas at fluvial flood risk:
- 300 mm above the 1% AEP event plus climate change water level;

In areas at risk of tidal flooding due to breach in the Thames Tidal Defence:

300 mm above the maximum water level caused by a defence breach, including consideration of climate change.

This is in line with [Southwark's Strategic Flood Risk Assessment \(SFRA\) section 5.2.6, Surface Water Management Plan](#) and [Flood Risk Management Strategy](#).

Flood resistance and resilience measures should be adopted where this is not achievable or flood depths of above 600 mm are anticipated. These measures should mitigate the potential damage to property in case of flooding. Measures will depend on the estimated flood depth and type of development.

Further guidance can be found in our [SFRA \(5.2.7\)](#) and from the [Environment Agency](#).

# **CHAPTER 4**

## **AIR QUALITY & ENVIRONMENTAL PROTECTION**

## 4. AIR QUALITY & ENVIRONMENTAL PROTECTION

This section provides more detail on how Southwark Plan 2022 policies will be applied. These include 'P65 Improving air quality', 'P66 Noise pollution and soundscapes', 'P65 Protection of amenity', and 'P64 Contaminated land and hazardous substances'. It also relates to the London Plan 2021 policies 'SI 1 Improving air quality' and 'SI 2 Minimising greenhouse gas emissions'.

### 4.1 Air quality

Southwark Plan policy 'P65 Improving air quality' and London Plan policy 'SI 1 Improving air quality' set out the policy requirements for improving air quality.

There are various sources of air pollution in Southwark. The main sources are road transport, gas boilers, commercial cooking, and construction. Air Quality will need to be considered when designing developments, especially if using natural ventilation.

All of Southwark has been designated an Air Quality Management Area (AQMA). This is because there are widespread areas of the Borough which exceeds the national [Air Quality Objectives](#) for NO<sub>2</sub> and PM<sub>10</sub>. The GLA also identify Air Quality Focus Areas (AQFA) that exceed the EU annual mean limit value for NO<sub>2</sub> and have high human exposure.

There are a series of Air Quality Focus Areas in Southwark and on the borough boundary. These can be seen in the [Southwark Air Quality Action Plan](#) and [Technical Guidance on Air Quality](#). These can also be viewed on [Southwark Maps](#).

#### 4.1.1 Air quality neutral

All developments are required to be air quality neutral in line with part (B) of London Plan 'Policy SI 1 Improving air quality'. The [Air Quality Neutral London Plan Guidance](#) provides advice on how to show that a development is air quality neutral.

### 4.1.2 Air quality assessments - Major applications

Major applications also need to submit an [air quality assessment](#). The council's validation checklist sets out what applicants need to submit. The air quality assessment includes the following sequential steps:

1. Preventing exposure. This can be done by eliminating, isolating or replacing sources and activities with alternatives.
2. Reducing and minimising exposure through mitigation.
3. Offsetting a new development's air quality impact. Applicants can do this by contributing to air quality improvements elsewhere in Southwark.

### 4.1.3 Air quality positive - Major referable development

Applications for major referable development must include an Air Quality Positive Statement. This should form part of the Environmental Impact Assessment (EIA).

More information can be found in the [Air Quality Positive London Plan Guidance](#).

#### Best practice for air quality

The following measures can help minimise emissions or mitigate against them:

- Suitable form, layout and orientation can increase dispersion of pollution.
- Good ventilation
  - » This should consider ambient air pollution and humidity. For example, locate air intakes away from sources of poor air quality.
- If there is a new combustion plant, consider the flue location and discharge velocity at planning stage.
- Road traffic emissions are the main source of severe air pollution in London.
  - » Development can help tackle this by prioritising walking, cycling and public transport. See the sustainable transport chapter for more information.

## 4.2 Light pollution

Artificial light provides valuable benefits to society. These include extending opportunities for sport and recreation and improving the sense of safety. Yet, it has the potential to become 'light pollution'.

This is where excessive light spill is harmful to wildlife or a source of annoyance to people.

### Lighting assessment

A lighting assessment will be required for all development proposing external lighting. It will also be required for applications involving works to areas of public access.

A lighting assessment should consider and include the following:

- layout plan with beam orientation
- schedule of the equipment in the design
- hours of operation
- light levels and spillage
- Impact on biodiversity
- Illuminance contours (with properties surrounding the development)
- The size of the lights/light fittings
- for projecting signs - mark the distance from the edge of the sign to the kerb edge

All exterior lighting should be designed to prevent obtrusive light from affecting any sensitive receptor.

External lighting must:

- Be in line with the Institute of Lighting Professional (ILP) Zone Standards;
- Be designed to minimise glare and light spill;
- Avoid conflict with traffic lighting, road and/or river users;
- Consider priority habitat designations;
- Use illumination levels that are no more than required for the purpose;
- Be energy efficient;
- Be visually unobtrusive, using discrete fittings and cabling; and
- Be appropriate to the character of the area in design and intensity.

Facilities with floodlights or significant external lighting may be subject to planning conditions. These conditions may restrict the times of lighting operation. The existing character of an area may influence what level of lighting it is acceptable.

Development sites on or next to a Site of Importance for Nature Conservation (SINC) are especially sensitive. In these cases, applicants should provide a lighting strategy to show how the impact of lighting on biodiversity has been mitigated. Refer to the chapter 5 for more detail.

## 4.3 Odour

Development must avoid creating odours that harm amenity. This is most often a consideration for restaurants and hot food takeaways. It also applies to some manufacturing processes and waste treatment or transfer sites.

Where development and land use create unwanted odours, these must be mitigated against.

### 4.3.1 Extraction system details

Restaurants and hot food takeaways must have suitable extraction systems. Applicants should submit details of this as part of the planning application.

This should include:

- Floor plans showing ductwork locations, kitchen layout and surrounding uses;
- Elevations showing ductwork and discharge points;
- Section plans showing cooking arrangement and extraction hood;
- Full technical specification of extraction system including fans, odour abatement and noise control;
- System maintenance requirements.

All kitchen extraction systems should include a suitable odour abatement plant. This should include more than cleanable coarse and fine filters. For example, carbon filters, electrostatic precipitation and UV/ozone treatment.

Developers may need to demonstrate that suitable duct space has been provided through the building to the roof level to accommodate the proposed or any future extraction flue. Flue outlets should also be at high level.

In some cases, a condition may be applied to planning permission. This may relate to maintenance of the extraction system or involve keeping records showing compliance.

### 4.3.2 Odour assessment

Applications for some other types of commercial sites may also be likely to harm amenity. In these cases, an odour assessment should be submitted as part of the application. This should include odour dispersion modelling.

## 4.4 Noise and vibration

Developments must use good acoustic design to achieve internal sound standards. Developments should not rely on insulation of the building envelope alone.

Southwark applies the Agent of Change principle to manage noise impact. This requires the person initiating a change to mitigate against the impacts on new and existing users from the change.

### 4.4.1 Noise impact assessment

For major developments that will generate noise, applicants must submit a noise impact assessment. This also applies to major developments that are likely to be affected by an existing source of noise.

A noise impact assessment must be prepared by a qualified acoustician.

It should detail:

- Noise exposure categories;
- Associated impact and mitigation measures;
- Layout, design and insulation;
- Information and plans about all plant equipment;
- Comprehensive measurement of examples of the noise source from existing sites operating elsewhere;
- Comparison and verification of measured data against existing data sources where possible. For example, from scientific literature or international standards;
- Assessment of the existing background level at the receptor location;
- Calculation of the predicted specific noise level at different locations. These include the façade, gardens and amenity areas of sensitive receptors. This should be based on relevant obtained data;
- Comparison of noise levels to relevant general standards. For example, WHO standards and BS8233:2014;
- Full consideration of the impact of LAF max noise. For example from door slams, ball strikes, shouts or whistles;
- Consideration of the character of the noise. This should include whether it may exacerbate the impact on amenity

The council's Environmental Protection [technical guidance for noise](#) sets out further detail.

### 4.4.2 Noise management plan

In some cases, [ongoing noise management and control will be particularly important](#). In these cases, a noise management plan will be required for major development.



## Best practice for noise

### Good acoustic building design

Buildings should be designed to mitigate noise impacts. This includes building layout and location or noise sensitive uses. This is more effective than measures based on the materiality of the building.

Design outcomes that can minimise these impacts include:

- Location of buildings on the site to minimise noise exposure. This includes maximising separation of noise sources and sensitive receptors. It also involves the use of buildings or topography to screen noise.
- Layout of habitable rooms within buildings to reduce exposure to more noise-sensitive rooms.
- Ensuring dwellings exposed to high noise levels are dual aspect. This will provide each unit with access to a relatively quiet façade when possible.
- Access to relatively quiet external amenity space
- Measures to reduce noise at source and/or on the transmission path where possible.

### Noise Mitigation Measures

Sometimes the building design and layout are unable to completely mitigate noise impacts. In these cases, materials and other detailed design measures include:

- Relocation of plant or noise-generating activity.
- Substitution for alternative or quieter plant or processes.
- Reduction in source noise levels via engineering methods. For example, lower-noise fans, flow smoothing on duct bends etc.
- Change in working practices or processes to reduce noise. For example, changing times of operation, reducing fan\jet power).
- Use of duct attenuators; acoustic barriers and acoustic absorption.
- Vibration isolation and/or damping.
- Enclosure of plant in insulating enclosures.
- Insulation of building envelopes.
- Enclosure of plant in insulating enclosures.
- Insulation of building envelopes.

## 4.5 Land contamination

Land contamination is most likely to arise from previous uses. It may also arise from an adjacent site that had industrial activity on it. Southwark's industrial history means that some brownfield sites may be contaminated. This is a material consideration for the purposes of Town and Country Planning. Owners and developers must establish the extent of potentially harmful materials.

Developers should identify the impacts of development at the design stage. This includes temporary, permanent, and cumulative impacts. [Developers must assess the potential risks from contamination](#). This should consider local circumstances and the proposed use. This needs to be submitted as part of a contaminated land assessment.

### 4.5.1 Contaminated land assessment

If a proposed development is on or near a site that is potentially contaminated, a contaminated land assessment must be carried out. The applicant must also take remediation measures. This also applies to any proposed development with a basement.

A detailed site investigation has multiple purposes;

1. To find out if the building or land are contaminated with dangerous material
2. To assess the contamination that is present.
3. To find out if it could affect human health or the environment.

Where there is a potentially contaminated site the following steps will need to be taken:

- For basement developments, if a site investigation is required it should be in the footprint of the area to be developed. I.e., within the actual area where the basement will be.
- Industrial development applications should include information on expected waste discharges. They should also explain how risks of pollution are being avoided. Where there will be discharges into waterways, a permit from the Environment Agency may be required.

## 4.6 Demolition plan and construction and environmental management

The impacts of construction and demolition can be detrimental to the environment. There can also be impacts on the health and safety of users of the site and its surroundings. These impacts include air quality, noise, odour, traffic and land contamination,

The council is a Highway Authority. This means it has a statutory obligation to minimise the impact of any works on its highway. This is set out in the Traffic Management Act 2004 (s.16. Network Management Duty). The applicant must demonstrate how they will carry out construction safely using public highways. They must explain how they will minimise and control vehicular movements to reduce road danger.

#### 4.6.1 Construction Environment Management Plan (CEMP)

All major development and some minor applications in highly sensitive locations will need to provide a Construction Environment Management Plan (CEMP) post approval. Preparing and negotiating a CEMP early on with the council will streamline development. It will also minimise detrimental impacts to the road network, the community and local businesses.

A CEMP provides a developer with an outline of what activities on public highways are acceptable.

This to ensure that:

- All activities are undertaken safely. This is to minimise the risk to the public as well as to operatives.
- Impacts on road users are minimised and traffic can flow.
- There is no damage to the highway or associated assets.
- The CEMP should show how the impact of the demolition and/or construction process will be managed and mitigated.

This should cover:

- Cumulative impacts in the area. These include noise, vibration, dust and air pollution, congestion and contamination.
- Issues arising because of construction, earthworks and drainage/ sewerage on site
- The location may require construction impacts to be mitigated, such as in a busy pedestrian area or close to a major junction.
- Network Management. This includes onsite activity, transport arrangements, monitoring, and community liaison.
- Opportunities for delivery consolidation or careful timing to reduce disruption. The CEMP should set out how this will be monitored.
- The environmental aspects of the scheme such as noise, dust, vibrations and air quality (see required standards below). Monitoring is carried out by the council's Environmental Protection team.

[The Technical Guidance for Demolition and Construction](#) sets out acceptable standards in detail.

### Best practice for CEMP

The best plans are made with the entire life span of the development in mind. The future building or structure and its environment as well as the building process must be visualised.

Stage 0	Stage 1	Stage 2	Stage 3	Stage 4	Stage 5
Application approved and CEMP required via S106 legal agreement	Appoint principal contractor	Undertake community liaison	Submit draft CEMP for council review and pay relevant fees .	CEMP approved and works can commence.	Ongoing monitoring and discussions carried out by council

# CHAPTER 5

## GREEN INFRASTRUCTURE, BIODIVERSITY & TREES

# 5. GREEN INFRASTRUCTURE, BIODIVERSITY & TREES

This section provides guidance on Southwark Plan 2022 policies 'P13 Design of Places', 'P58 Open Water Space', 'P59 Green infrastructure', 'P60 Biodiversity' and 'P61 Trees'.

Other policy considerations include:

- The Southwark Nature Action Plan 2020. This contains Habitat Action Plans and measures which developers should take to promote biodiversity.
- The emerging London-wide Local Nature Recovery Strategy (LNRS).
- Mandatory Biodiversity Net Gain, which applies to minor and major developments (with exceptions).
- Designations such as SINC, open space, Tree Preservation Orders (TPOs) and Priority Habitat.

## 5.1 Green infrastructure

Green infrastructure is a term used to describe a network of green spaces within an area. When designed well, green infrastructure is multi-functional. It should be an additional enhancement, not just compensation for habitat loss or biodiversity impacts. It should be appropriately maintained to promote longevity. Green infrastructure can provide benefits for nature, the built environment, and physical and mental wellbeing. Its provision should consider the context and character of a place and the priorities and needs of the local community and wildlife, including;

- Cooling and shading, which reduce the urban heat island effect.
- Carbon storage and improved air quality.
- Increasing soil absorption, which helps reduce the risk of flash flooding.
- Enhancing the public realm and the character of a place.
- Recreation, leisure and increased access to nature.
- Opportunities for active travel.
- Pollination of plants by insects.
- Food growing opportunities.
- Habitats for insects, birds and small mammals

### 5.1.1 Designated open spaces

Southwark's designated open spaces, including Metropolitan Open Land and Borough Open Land, help to deliver these benefits.

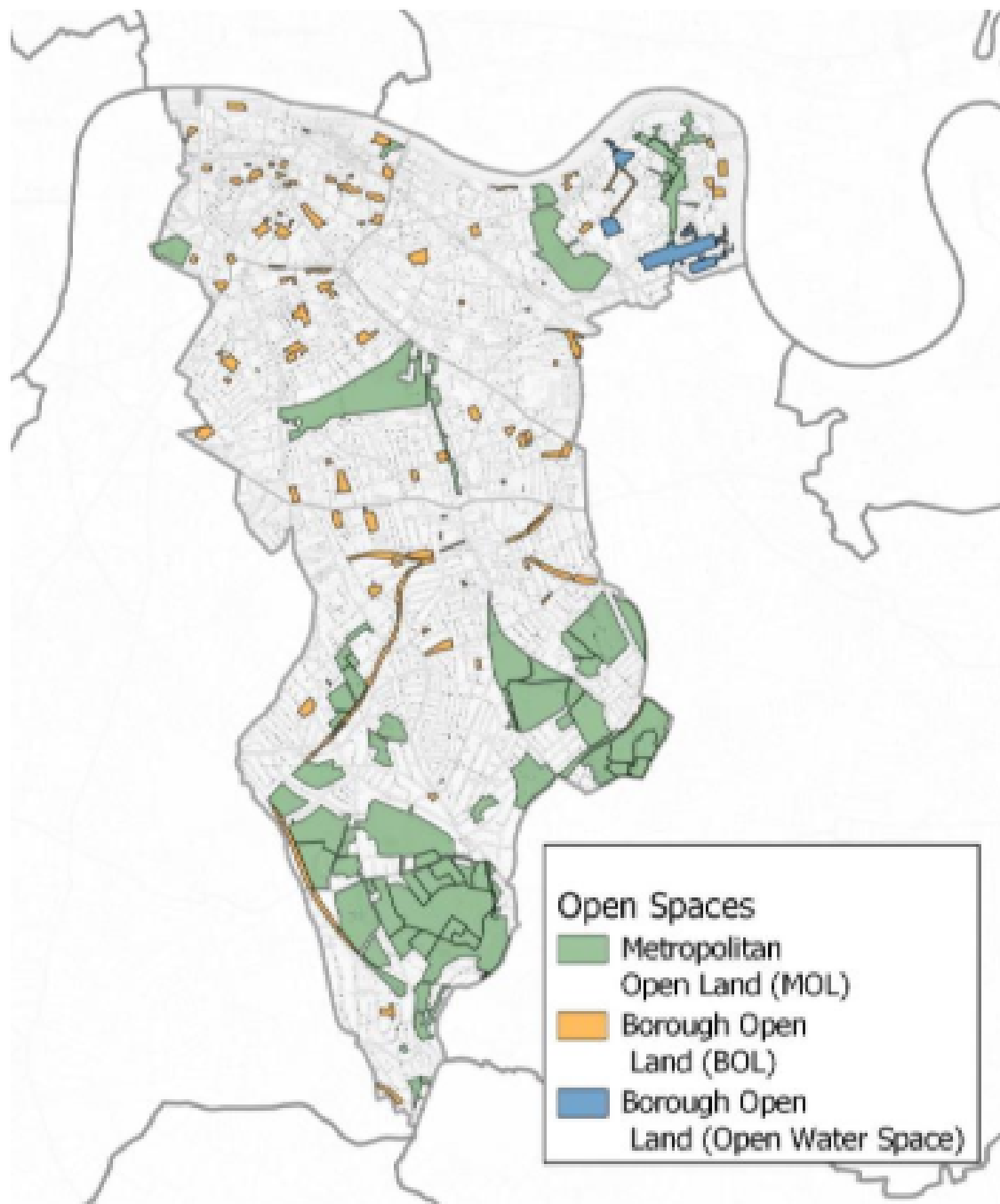


Figure 16: Designated open spaces, including Metropolitan Open Land and Borough Open Land

### Best practice for green infrastructure (all development types)

- Developments should include measures which contribute to the green infrastructure of a site and surrounding area. This could include tree planting, rain gardens, pocket parks and biodiverse green roofs and walls.
- Applicants should consider how its provision of green infrastructure responds to the issues and needs of a site and the surrounding area.
- Areas which could benefit from green infrastructure include:
  - » Air Quality Focus Areas (on Southwark Maps Spectrum Spatial ([southwark.gov.uk](http://southwark.gov.uk)))
  - » Areas susceptible to surface water flooding
  - » Areas deficient in access to open space and nature
  - » Areas in need of improved green links and connectivity to other areas of open space and nature.
  - » Urban heat island hotspots. Refer to the GLA London Climate Risk map for more information.
  - » The position of buffer planting and provision of amenity space.
- Developers should seek opportunities to turn underused areas of hard surfaces into green spaces. For example, planting trees and vegetation using pocket parks or mini woodlands.
- Applicants should consider how tree planting can shade amenity space, play areas and pedestrian routes. This can help mitigate urban heat island effect.
- Applicants should refer to the national green infrastructure standards (Green Infrastructure Standards for England, [naturalengland.org.uk](http://naturalengland.org.uk)).



### 5.1.2 Sites of Importance for Nature Conservation (SINCs)

Southwark has a network of Sites of Importance for Nature Conservation (SINCs). They contribute to the green connections which link open space and nature to Southwark's communities.

SINCs are designated based on the habitats and species they support and their value for nature conservation. SINCs may also be designated as statutory local nature reserves, or as open land.

They often include;

- Areas of protected [Priority Habitat](#). In Southwark, this includes woodland, open mosaic habitat and ponds.
- Areas of irreplaceable habitats, such as ancient woodland and veteran trees.

Developers should avoid damage and/ or disruption to a SINC. Developers should refer to Southwark Maps to check how close their site is to a SINC and follow the ecological mitigation hierarchy (refer to section 5.2.1).

Proposals should consider the effect of shading and artificial lighting on nearby SINCs and other habitats. Bat Friendly lighting should be used where appropriate, in line with guidance in [ILP \(GN08/23\)](#).

Where negative impact on a SINC is unavoidable, mitigation should be carefully considered from the site design stage. It will only be permitted in exceptional circumstances. It should be discussed with the council at pre-application stage.

#### Best practice for SINCs (all development types)

- Development should enhance habitat connectivity to a SINC and, where possible, between SINCS and open spaces.
- Development next to open spaces should include green buffers of biodiverse planting. The width should be proportionate to the site and aim to create an ecological transition between the land uses on site.
- Development should aim to prevent the creation of wildlife barriers which block green corridors and fragment habitat.

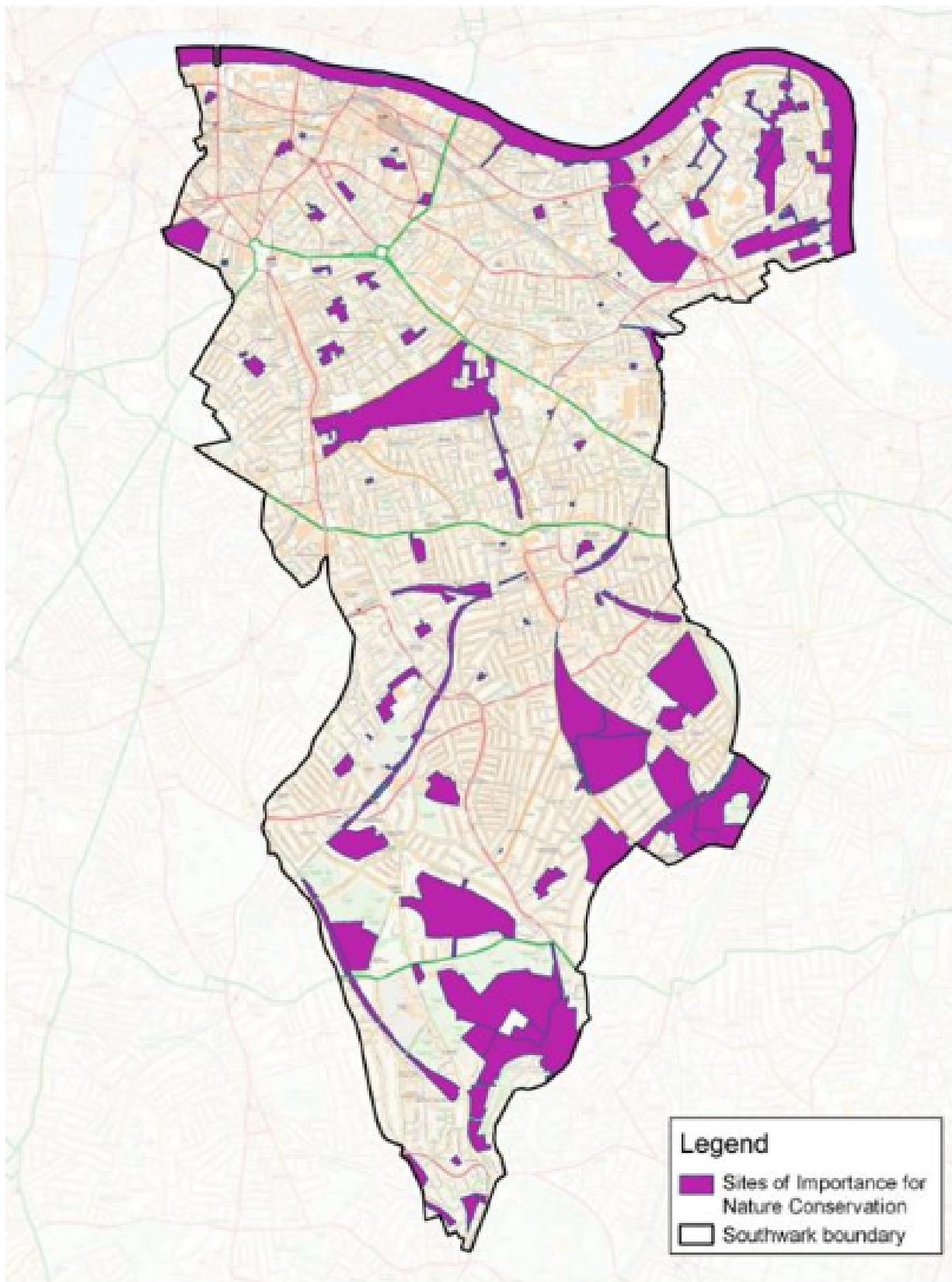


Figure 17: Map of SINCs in Southwark

### 5.1.3 Urban Greening Factor (UGF) - Major developments

The London Plan's Urban Greening Factor (UGF) policy G5 relates to the benefits provided by different surface and ground coverings. These range from sealed surfaces to landscaping and biodiverse green roofs. Benefits include surface water absorption and increased biodiversity.

All major developments must meet the London Plan's UGF targets. This is particularly important in areas of high density and/or open space deficiency.

- Mainly residential development should score a minimum UGF of 0.4.
- Mainly commercial development (excluding B2 and B8 uses) should score a minimum UGF of 0.3.

Applicants should refer to the council's validation checklist for the UGF planning application requirements. These are separate to the validation requirements for Biodiversity Net Gain.

#### Best practice for UGF (all development types where relevant)

- Urban Greening Factor (UGF) should be considered alongside Biodiversity Net Gain. UGF surface and ground coverings with a higher rating tend to be more beneficial for biodiversity.
- Trees on roofs should be counted in the UGF calculation as intensive green roof only. They should not be counted again in the tree planting surface category.
- Ground-level trees in planters should not be included in UGF calculations.
- Avoid over-extensive use of mown lawns, where possible.
- Retain or maximise the coverage of shrubs and hedges on site.
- Refer to the Mayor's Urban Greening for Biodiversity Net Gain design guide.
- Refer to national UGF guidance UGF 3.3 User Guide ([naturalengland.org.uk](http://naturalengland.org.uk)).
- Refer to section 5.3 for best practice on wildlife planting

### 5.1.3 Green roofs and green walls

Green roofs provide a growing medium and drainage system for a range of plants. They can provide thermal efficiency, biodiversity and amenity.

Green roofs can be categorised as follows:

	<b>Extensive Green Roof</b>	<b>Semi-intensive Green Roof</b>	<b>Intensive Green Roof or vegetation over structure</b>
<b>Planting type</b>	Mosses, herbs, grasses	Grasses, ferns, woody plants and shrubs	Lawns, perennials, shrubs, trees
<b>Maintenance and Use</b>	Low maintenance Visual and Biodiversity.	Maintenance depends on planting	High maintenance Amenity space – roof gardens
<b>Minimum depth of settled substrate</b>	80mm (or 60mm beneath vegetation blanket)		150mm

Developers should provide details of the design, construction and management of green roofs and consider structural loading requirements early on. This includes:

- The depth and specification of the substrate. This should be suitable for shallow and deep-rooted plants. Variable depths can create habitats for a greater range of invertebrates. Pebbles, gravels, sands, branches and logs can offer suitable habitats.
- A roof plan showing the number, size, species and density of the proposed planting. Green roofs will be expected to be laid out in accordance with this plan.
- Drought tolerance of the planting.
- How the roof will be used. Not all green roof types are suitable for amenity sitting out space and will be restricted to maintenance or emergency access only. Incorporating solar PV onto a green roof will also reduce the area available for greening and will require a specific design.
- Maintenance. This includes the frequency of irrigation and who is responsible.
- Confirmation that the green roof will be planted and/ or seeded within the first planting season following practical completion.

Extensive green roofs should not be used as amenity sitting out space and should only be used in the case of essential maintenance, repair or escape in the event of an emergency. Semi-intensive and intensive green roofs can be used for amenity space, but any proposed seating should be situated on hard surfaces and not on the greenery.

Green walls may be either green facades or living walls. Green facades use plants rooted from the ground or planter boxes that climb up trellises. Living walls use modules across the wall. Irrigation and maintenance needs must be considered from the outset.

Fire regulations should be considered when designing a green wall. Dry grasses and oily foliage should be avoided. Built heritage and townscape impacts should also be considered.

### **Best practice for green roofs and green walls (all development types where relevant)**

#### **Biodiverse green roofs should:**

- Aim to meet the definition of Open-Mosaic Habitat: a patchwork of varied, habitats with a range of ground conditions (substrate, topography, water and nutrient availability, aspect) and vegetation heights.
- Capture rainwater and minimise runoff;
- Use sustainable irrigation, not mains water
- Use minimum 75% wildflower planting and maximum 25% sedum coverage;
- Have varied substrate composition and depth;
- Include invertebrate enhancements such as log and sand piles;
- Be compatible with solar panels (bio-solar roofs) where practical;
- Be considered on structures such as cycle storage and bin stores, where practical.

#### **Green walls should**

- Maximise solar gain in winter and provide shading for buildings in summer;
- Include native plants and those listed in the RHS plants for pollinators guide<sup>18</sup>.
- Be considered on perimeter walls and small structures such as bin and cycle stores



Figure 18: Modular living wall in Elephant and Castle

#### 5.1.4 SuDS and rain gardens

The management of surface water SuDS and rain gardens provide opportunities for enhanced biodiversity, landscaping and amenity features.

Rain gardens provide an opportunity to channel surface water towards root areas and provide low maintenance irrigation. They should have absorbent and free draining soils, although below ground utilities and known archaeology should also be considered. Rain gardens should use plants which are resilient to inundation and trees, shrubs and herbaceous perennials which have a known benefit wildlife.

#### Best Practice for SuDS and rain gardens (all development types where relevant)

##### Sustainable drainage systems (SuDS) should:

- Be integral to project design;
- Provide additional benefits where possible. These may be for ecology, urban cooling, visual quality or amenity;
- Consider opportunities to incorporate nature-based SuDS. For example bioswales, rain gardens and rainwater re-use and harvesting.

For further guidance please refer to [SuDS in London – a guide \(tfl.gov.uk\)](https://www.tfl.gov.uk/guidance/suds-in-london-a-guide)

## 5.2 Biodiversity and ecology

### 5.2.1 Ecological mitigation hierarchy

The ecological mitigation hierarchy (Figure 19) is an established approach to mitigating the ecological impacts of a development. The steps should always be followed when designing a site, before mandatory Biodiversity Net Gain is applied. This will help limit any negative impacts on biodiversity.

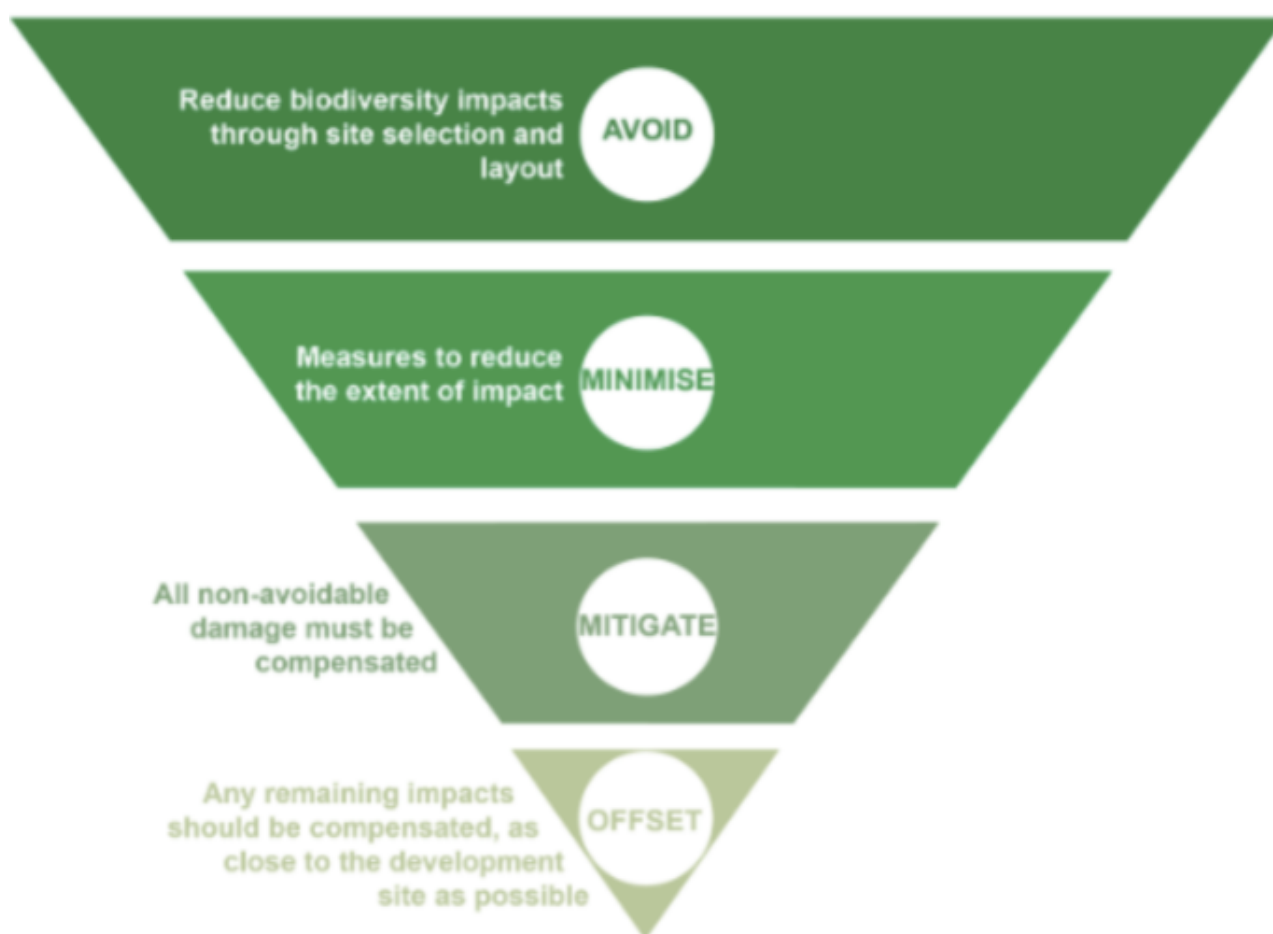


Figure 19: The ecological mitigation hierarchy

### 5.2.2 Biodiversity Net Gain (BNG)

Biodiversity Net Gain (BNG) is a statutory requirement arising from the Environment Act (2021). It ensures that habitats are left in a measurably better state than they were before the development.

Major and minor developments (with some exceptions) must provide a minimum of 10% Biodiversity Net Gain over the pre-development biodiversity value of the site. This is a legal requirement. BNG does not remove the need for the ecological mitigation hierarchy or other environmental and protected species legislation, guidance and professional codes. Further details are on the [Government's biodiversity web pages](#).



Applicants should aim to deliver the greatest biodiversity gain possible, designed and delivered in a way which is appropriate to the site context. Applicants should check whether their site is in or close to a designated open space or a Site of Importance for Nature Conservation (SINC). Consideration should be given to how onsite biodiversity relates to existing habitats or green corridors within the site or beyond the red line boundary.

Any irreplaceable habitats present on a site should be recorded in the Biodiversity Statutory Metric. In Southwark, irreplaceable habitats include ancient woodland and veteran trees. Impacts on the habitats should be avoided. Any impacts flagged will be considered unacceptable and will require discussion with the council. If there are no impacts, the enhancement of irreplaceable habitats can contribute towards a development's BNG.

Impacts on the borough's Priority Habitats, defined by UK Hab data, should be avoided. These habitats include woodland and ponds. Applicants should check Southwark Maps and [www.magic.gov.uk](http://www.magic.gov.uk) for the location of these areas and the habitat type.

BNG should be provided on-site. Where this is not possible, offsite BNG should be provided. This should be as close to the site boundary as possible. A registered offsite BNG provider should be used. Evidence will be required at planning application stage of any offsite BNG units being reserved or purchased. Statutory credits will only be accepted as a last resort. This must be discussed with the planning case officer before an application is submitted.

Habitat interventions need to be realistic and deliverable within the defined project timeframe.

### Completing the Statutory Biodiversity Metric

Applicants should follow the guidance in the Government's Statutory Metric User Guide. The correct statutory BNG metric should be used. The biodiversity metric Trading rules and Principles must be followed.

If a small site is proposing offsite BNG or if Irreplaceable Habitat or Priority Habitat is present onsite, the Statutory Metric should be used.

The metric should be used as early as possible in the site design process. It should guide decisions on how to avoid biodiversity loss and maximise gains. A competent individual, such as an Ecologist, should complete it. A qualified river condition assessor should complete the watercourse part of the metric. This applies if the site has a watercourse, or any part of the site's red line boundary is within 10m of a watercourse.

Applicants must meet the validation requirements on the Southwark Council website. Further guidance can be found in [the Government's Biodiversity Net Gain PPG](#).

The Biodiversity Gain Plan and completed statutory metric submitted after planning approval must be reflective of site design.



## Strategic significance

Strategic significance in the BNG metric describes the local significance of a habitat, based on location and habitat type. Strategic significance is set to either high or low and should be recorded in the pre and post-development parts of the metric.

The statutory metric requires applicants to apply a strategic significance score of 1.15 if it is close to areas where sensitive ecology which are mapped. When available, applicants should also refer to London's Local Nature Recovery Strategy (LNRS). Sites close to the LNRS will have a strategic significance score of 1.15.

In the meantime, if a development site and/ or habitat to be created or enhanced is in or adjacent to the following locally ecologically important sites, the strategic significance in the metric should be set to 1.15.

- Local Nature Reserve
- SINC
- Designated open spaces (MOL, BOL)
- Open water
- Sites with a Habitat Action plan listed in the Southwark Nature Action Plan (SNAP)
- Priority Habitat, as defined by Natural England.

The low distinctiveness score should be used where the site area or compensation area is not defined in the local strategies above.

## BNG 30-year management and monitoring

Government policy requires that BNG which is considered to be 'significant' is maintained by the developer or landowner for 30 years from the completion of the scheme. In Southwark, the definition of 'significant' BNG will depend on;

- the scale and complexity of the site
- the pre-development and post-development biodiversity value and distinctiveness, as defined by the Biodiversity Metric.

Significant BNG will be secured in a S106 agreement. A monitoring fee will be required. Development sites with significant BNG will be required to;

- Submit a Habitat Management and Monitoring Plan after planning approval, before the commencement of development. This is in addition to the requirement for a Biodiversity Gain Plan and a final, completed Statutory Metric.
- Manage and maintain the BNG for at least 30 years after the development is completed.
- Submit Habitat Condition monitoring reports to the council at agreed intervals. This will typically be at years 2, 5, 10, 15, 20, 25 and 30.

### Best practice for BNG (all development types)

- Consider how biodiversity measures can be multi-functional. They can form part of the site's landscaping and amenity space strategy. They can also form part of nature-based sustainable drainage systems.
- Deliver BNG in a way which is most beneficial to the site. For example, native species should be prioritised in habitat corridors and priority habitat/ ancient woodland.
- Use the council's pre-application service if you need advice.
- Refer to Southwark's Nature Action Plan 2020 for information on biodiversity and protected species in Southwark.

## 5.3 Trees

Trees are an important feature of the borough's public realm and amenity space. They provide a range of benefits:

- Character and a sense of place
- Screening, cooling and shading benefits
- Filtering traffic noise
- Absorb dust and other pollutants.
- Provide ground, trunk and canopy habitat for a range of birds and invertebrates

Large, mature trees are a landscape, environmental and amenity asset. Development should avoid and mitigate the risk of damage to trees and their root systems during design and construction. Developers should refer to the British Standard BS 5837:2012 for trees. This relates to design, demolition and construction.

An Arboricultural Impact Assessment will be required at planning application stage for any application where there is a tree protection order (TPO). Refer to Section 9.2 of Southwark's Heritage SPD for more information.

Applicants should refer to the Southwark's Streets for People Strategy. This provides guidance on tree planting and nature-based solutions on highways and public footways. Tree planting should allow easy access for future maintenance to underground services. For example, gas and water pipes, and electricity cables. Refer to Street Works UK guidance for further details.

Applicants should adhere to the ‘right tree, right place’ principle, and follow the guidance in the [Southwark Tree Management Policy](#).

Trees planted as part of a development must be maintained according to guidance from the Woodland Trust until they are fully established. Tree canopy cover onsite should be increased where possible. This will support the Southwark Climate Change Strategy (2021) goal of reaching 24% canopy cover by 2030.

### CAVAT (Capital Asset Value for Amenity Trees (CAVAT))

CAVAT is one of the principal methods of tree valuation in the UK. It recognises the value of large, mature trees as a landscape, environmental and amenity asset. All Category A and Category B trees should be retained onsite. Only in exceptional circumstances will the council allow appropriate replacement with new trees. Applicants must justify this with evidence.

Replacement must not cause a net loss of amenity. This is based on the existing value of the benefits of the tree removed, calculated using CAVAT. Applicants should appropriately mitigate any loss of category C trees.

### Tree specifications

Developers should plant trees that are resilient to the impacts of climate change and appropriate to the site context. Developers should refer to Southwark’s latest Species Palette for a list of appropriate trees. Large canopy trees should be planted where possible.

Newly planted trees should have a stem circumference of 12-16cm (measured at 1m above root collar level). This is because trees of this size are more adaptable to planting and establish growth faster than larger tree stock.

Trees must be planted with sufficient soil volume:

	Canopy area	Target soil volume
Large (8m plus diameter)	50m <sup>2</sup> +	30m <sup>3</sup>
Medium (5m - 8m diameter)	19.6m <sup>2</sup> +	12m <sup>3</sup>
Small (3m – 5m diameter)	7.1m <sup>2</sup> +	5m <sup>3</sup>

Note: This formula does not apply to columnar habit trees. The soil volume requirements can be calculated for narrow trees by basing the canopy diameter on the natural growth form, which is the widest spread of that species.

### Best practice for trees (all development types)

Where possible, trees should be provided at grade, on a level surface and in natural soil. Planters should be avoided.

#### Soil

Trees need nutrient rich, moist, well aerated and uncompact soil to mature in an urban environment. Degraded soil should be improved or replaced. Soil should be improved by:

- Increasing rootable volume.
- Decompaction.
- Mixing heterogenous, obstructive soil layers.
- Soil amendments (e.g. compost (tea), sand, clay, lava, biochar, limestone – depending on the problem).
- Soil replacement by suitable high -quality planting substrate. This should only take place if it is impossible to sufficiently improve the current soil).
- Tree pits should include a gravel aeration layer and be constructed in a manner which avoids soil compaction.

Development which is set back from woodland should be planted so that a woodland buffer can develop. This helps provide a gradual transition; as follows:

1. Forest trees such as oak, ash and beech, to
2. Woodland edge trees such as birch, hawthorn, rowan and willow
3. Woodland edge shrubs such as blackthorn, dogwood, elder, hazel
4. Wayfaring trees, herbaceous vegetation and gardens.

The width for a woodland buffer area is around 15m. This is measured from the centre of the trunk of the largest forest tree species growing closest to the edge of the existing woodland.

#### Trees in Conservation Areas

Development that affects trees in a Conservation Area should consider the landscape setting, as well as the role of the trees in the historic context. This may be particularly important in the Dulwich Wood area. Developers should refer to the relevant Conservation Area appraisal. ([Conservation Areas - Southwark Council](#)).

## 5.4 Wildlife habitats

Developers should consider ways to improve the habitats they provide for wildlife. Features such as swift bricks, bird and bat boxes are strongly encouraged and are usually required by planning conditions. Insect hotels, log piles and hedgehog friendly fencing should be considered.

These features cannot be counted in the Biodiversity Net Gain Statutory Metric, but should form part of the site's overall biodiversity strategy.

Developers are encouraged to survey for fauna before undertaking maintenance or development. A Preliminary Ecological Assessment (PEA) will usually be required. Refer to the council's validation checklist for details.

### 5.4.1 Diverse planting

Planting strategies should go beyond traditional soft landscaping and tree planting. Wildflower meadows, mini woodlands, mixed native hedging, orchards and wildlife ponds should also be considered. It should provide a variety of microclimates for users, such as access to sun, shade and wind shelter.

- Planting strategies should be developed which cater for local wildlife and declining species. Professional advice should be sought where possible.
- Planting should include a high proportion of nectar rich, pollinator-friendly flora and native species, ideally at least 50%.
- Vegetation and planting should be used to stabilise slopes and soils vulnerable to erosion
- Barriers which block the movement of wildlife, such as hedgehogs, should be removed where possible.
- Area created to promote biodiversity should be maintained to a high standard to promote longevity.
- Management plans for the long-term maintenance of habitats for biodiversity should be in place for grounds maintenance.

## Best practice for wildlife habitats (all development types)

### Swift bricks

- Swift bricks should be installed where possible;
  - » 1 to 4 should be installed on a medium to large house
  - » 4 to 10 on a small block of flats and 10 to 20 on a large site e.g. a school, hospital, warehouse or major residential development.
- Swift bricks should be at least 5 metres above ground, out of direct sunlight or shaded beneath broad eaves.
- Allow a minimum 5m clear drop beneath and in front of the box
- To avoid disturbance, there should be a minimum of 5m without windows or doors under and in front of swift boxes.
- They should not be obstructed by trees, cables, creepers or aerials.

### Bird boxes

- Use untreated wood
- Clean out each year in winter, use boiling water.
- Use different size holes to cater for different species.

### Bat Boxes

- Use untreated wood and scour the inside back panel so the bats can grip it
- Never clean out or disturb the bat boxes – a licensed bat specialist is required to do this
- Affix boxes facing south or southwest
- Install several around 1 tree as bats like to move about during the seasons
- Avoid installation in illuminated areas.

## Best practice for diverse planting (all development types)

### Wildflower Meadows

- Seed mixes should include UK native wildflowers and meadow grasses
- Aim to include 50% native species and a minimum of 60% of plants on the RHS 'Perfect for Pollinators' list.
- Position to optimise exposure to the sun
- Meadows can be established with meadow turf (plastic-free) or by sowing seeds. Ground preparation will be required.
- Timed maintenance, including once or twice a year 'cut and collect' regimes will allow plants to seed after flowering and maintain low nutrient levels.
- Signage can be installed to communicate the benefits of 'relaxed' mowing regimes.

### Invertebrate habitats or 'insect hotels'

- Build wooden structures with a variety of fillings, including canes, bark, wood, rolled up corrugated cardboard, reeds and stones and secure with mesh.
- Use untreated wood if possible.
- Log piles and dead hedges can be left as habitat for invertebrates.

### Loggeries and habitat piles

- Invertebrate habitats provide shelter to insects and foraging habitat for birds and mammals. This includes dead wood and loggeries, valuable habitats for the endangered stag beetle
- Install logs vertically, half buried in soil and secure well
- Use broadleaf hardwood (e.g. oak, beech, sycamore, ash), not conifer wood.
- Site the loggery in a partially shaded site.
- Install log or stone piles close to the pond to provide shelter for amphibians

### Hedgehog friendly fencing

- Hedges or open fences allow hedgehogs through without modification.
- A 13 x 13cm hole will allow a hedgehog to pass through, while limiting other animals such as cats or foxes.
- Use gravel boards with precut holes which allow hedgehogs through without affecting strength or security.

## 5.5 Open water

Development by open water should maximise benefits for water ecologies. Developers should balance this with access and amenity improvements.

New development should be set back from watercourses or open water. This creates a buffer area for environmentally sensitive design and management. Buffer planting should include trees or shrubbery with understorey vegetation. It should complement and enhance the area that it is protecting. Lighting design should minimise light spill onto open water.

Wildlife ponds provide a water source and attract wildlife such as frogs, newts and dragonflies. Ponds with wetland and marginal planting should be included where feasible. Ponds should be dug to provide a range of depths and shallow profiles. Refer to the Wildfowl and Wetland Trust website for a [step-by-step guide](#).

### Best practice for open water (all development types)

#### Wildlife ponds

- Locate the pond away from trees to avoid it filling with leaf fall.
- Try and fill the pond with rainwater. Mains water can result in algal blooms.
- In small ponds, avoid introducing aggressive marginal plants such as flag iris and fish, which eat amphibians.
- Consider fencing the pond or installing a surface grid for safety



# **CHAPTER 6**

# **MOVEMENT & TRANSPORT**

## 6. MOVEMENT & TRANSPORT

This section provides more detail on applying the Southwark Plan 2022 policies 'P49 Public transport', 'P50 Highways Impacts', 'P51 Walking', 'P52 Low line routes', 'P53 Cycling', 'P54 Car parking' and 'P55 Parking standards for disabled people and the physically impaired'.

It also relates to London Plan 2021 Policy 'T1 Strategic approach to transport', Policy 'T2 Healthy Streets', Policy 'T3 Transport capacity, connectivity and safeguarding', Policy 'T4 Assessing and mitigating transport impacts' and Policy 'T5 Cycling'.

A whole site approach will need to be taken to achieve more sustainable transport outcomes following the hierarchy set out above.

### 6.1 Walking and wheeling

#### 6.1.1 Designing streets

Streets and footpaths should be designed to be walkable, accessible, safe and inclusive for all. The [Southwark Streetscape Design Manual \(SSDM\)](#) demonstrates how to create streets that can be enjoyed by everyone. This manual should be referred to for any development which interacts with public streets or footpaths.

Streets can be improved for all users by:

- Including clear, logical and inclusive wayfinding signage, maps and local information.
- Using safety measures. This can include the use of lighting, passive surveillance of the street or encouraging street activity.
- Placing safe crossings for pedestrians along key walking routes. The crossings should be straight across the road and located for the benefit of pedestrians. Crossings should also link up with walking routes.
- Submit details of the gradient, length and landing of any ramps and provide spot levels (points which indicate height above sea level) on plans for any area of the site that will have direct access onto the public highway.
- Creating walkways that protect pedestrians from collisions with cyclists. Design pedestrian and cycling paths to be separated by a kerb, different paving or painted line which delineates the mode of travel.

Footpaths can be improved all users by:

- Maintaining a minimum width of 4m from kerb to property on the local road network. This minimum width should be 7m for Old Kent Road.
- An unobstructed path of 2.4m will need to be maintained where there is street furniture in place (such as plantings, cycle parking, or outdoor tables and chairs)
- Using tactile paving so that visually impaired people can detect dropped kerbs with their feet and cane. The [inclusive mobility guidance](#) sets out more information on the types of tactile paving that can be used.
- Considering wheelchair user access to the front door of the building from the back edge of the public highway, routes to/from Blue Badge Bays and routes to/from accessible cycling spaces.

### Best practice for designing streets

To make streets as accessible and easy to use for all users, it is best practice to use tonal and colour contrast, which can help visually impaired people identify street furniture.

## 6.2 Cycling

Reducing emissions from private vehicles is an important step towards making the borough carbon neutral by 2030. Many people use cars, or other polluting vehicles, because there are barriers to travelling in a more sustainable way. Storing a bicycle, for example, can often be difficult without a dedicated cycle store.

To encourage more sustainable travel, developments must provide adequate provision of high-quality cycle parking and storage. This needs to be considered at the start of the design process.

### 6.2.1 Cycle parking requirements

The Southwark Plan 2022 policy 'P53 Cycling' and London Plan policy 2021 'T5 Cycling' set out cycle parking requirements. These requirements will ensure that current and future demand is catered for. The amount of required cycle parking spaces varies depending on the development type. There are also different requirements for visitor and long-stay cycle parking.

Sprawling areas often need higher levels of cycle parking as there can be poor accessibility to public transport. This is to ensure there are good opportunities for sustainable travel in these areas.

To address this, residential development should:

In areas of low Public Transport Accessibility Levels (PTAL) ( $\leq 4$ ),

- Meet at least the minimum cycle parking requirements of the London Plan policy T5. This is a higher requirement than the Southwark Plan policy P53.

In areas of higher Public Transport Accessibility Levels (PTAL) ( $\geq 5$ ),

- Meet at least the minimum cycle parking requirements of the Southwark Plan policy P53. This is a higher requirement than the London Plan policy T5.

### 6.2.2 Cycle parking design

Applicants must refer to the latest design standards when designing a cycle store. This may be updated by Transport for London or another relevant transport body.

The council will only accept cycle parking spaces in Sheffield stand or two-tier rack form. This is due to their ease of use. The required amounts of each stand will depend on the type of development and the expected users. Vertical or semi-vertical racks are not considered acceptable. These require lifting of cycles and may therefore be difficult for some to use. They can also cause damage to cycles.

Cycle parking must also be accessible for people with different needs and physical abilities. Many young families for example use cargo bikes as their main mode of transport. Disabled people can also operate various adapted cycles that fit their abilities. Both of these cycles will need larger parking spaces than standard bicycles. This approach is in line with Southwark Plan Strategic Policy 'SP6 Climate Emergency', which states that Southwark should be a place where 'walking, cycling and public transport are the first choice of travel as they are convenient, safe and attractive'.

Further design principals for cycle storage include, but are not limited to:

- Entrance to the cycle storage facility should be easy and separate to any vehicle traffic and located away from delivery bays.
- The entrance should be well overlooked and well lit, particularly at night-time or where the parking is under cover.
- Access should be considered carefully, particularly for those using non-standard cycles, with clear signage from the main entrance of the building.
- Access routes to the storage should be 1.5 wide minimum in any new development.
- Doors on routes to cycle stores must be power assisted.

- Aisles within the storage must be 2m wide with Sheffield stands, and 2.5m wide with two-tier racks.
- It is recommended that external doors are a minimum of 2 metres wide.

Small schemes and conversions may not be able to provide cycle parking in a building. In these cases, a secure, weatherproof place to store all types of cycles should be provided. These can be in the form of purpose-built cycle stores that are enclosed on all sides. Horizontal bike lockers for individual properties can be accepted where space does not allow for a traditional purpose-built cycle store.

### 6.2.3 Showers and changing facilities

These are required for all commercial development. These are places or rooms within a commercial or office building that are designed to support people who cycle or walk to work.

These should include:

- Accessible changing facilities
- Showers - Generally a shower is required for every 10 cycle spaces
- Lockers - there should be a locker per cycle space.

### 6.2.4 Short stay cycle parking – for visitors and customers

Required short stay cycle should be provided on site wherever possible. This is to encourage shoppers, customers, deliveries and visitors to travel sustainably.

The parking may only be provided on the street in exceptional circumstances. This is typically when the constraints prevent the parking being provided on site. A S106 contribution of £370 per Sheffield stand (as of 2024) will be required to facilitate on-street cycle parking. This figure may vary from year to year.

### 6.2.5 Encouraging cycling

The following methods can be included in proposals to help to encourage cycling.

#### Cycle clubs

- Cycle clubs can be created in residential and non-residential developments by providing free bookable standard cycles and e-bicycles during the tenancy.

#### Cargo bike clubs:

- Southwark has sponsored the introduction of cargo bikes in Walworth and Dulwich through a partnership with Peddle My Wheels, as part of the OurBike scheme. These can be utilised by residents to allow them to sustainably make their own deliveries and collections (such as weekly shopping).

#### Pool bikes

- The following steps can be taken to help with setting up a pool bike scheme:

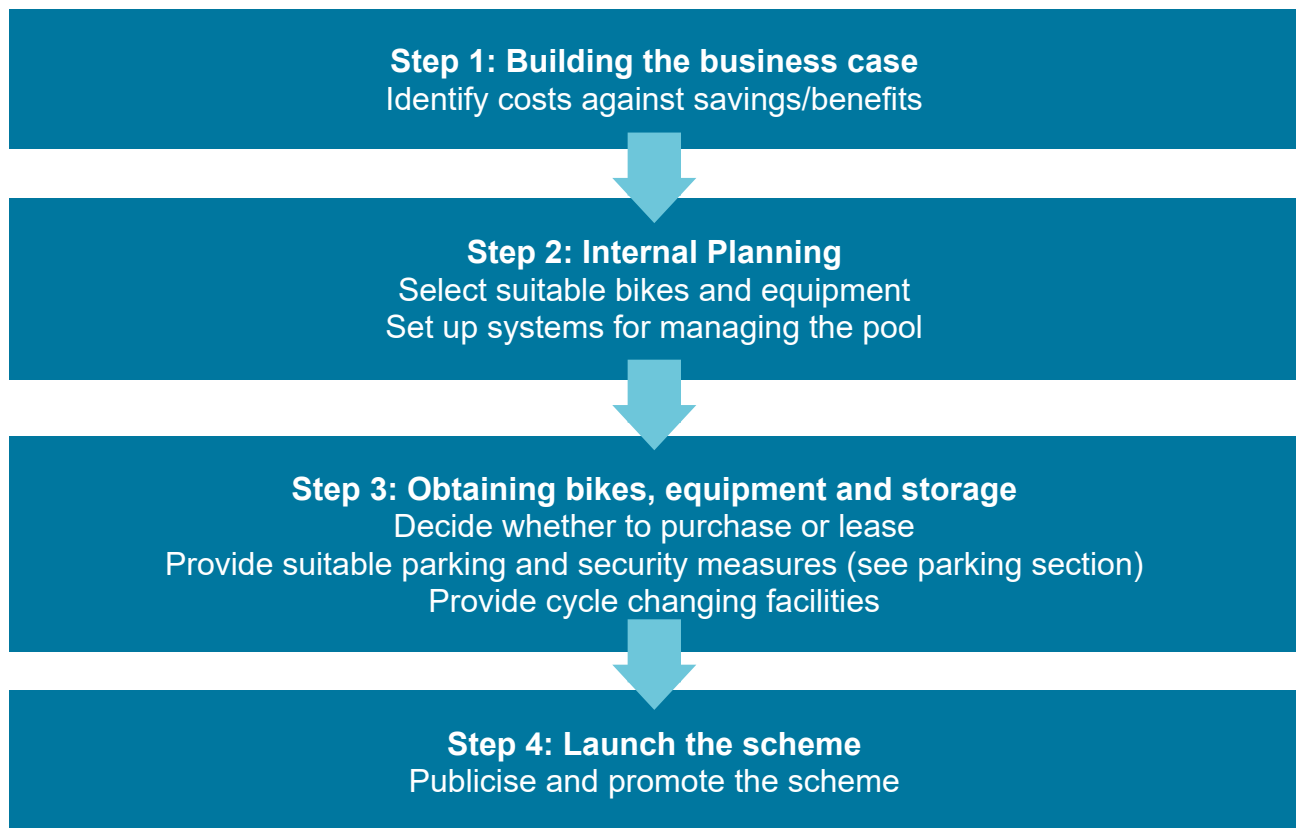


Figure 20: Flowchart showing steps that can be taken to help with setting up a bike pooling scheme.

## 6.3 Accessible public transport and capacity

### 6.3.1 Providing good walking and cycling links to public transport

Safe and accessible walking and cycling routes can encourage the use of public transport.

The following steps should be taken when providing these links:

- Consider how the users of the development are likely to move around. Likely movements will include travelling to and from work, local amenities (such as parks) and infrastructure (such as schools). These movements will vary between different types of development
- Identify existing walking and cycling routes which surround the site.
- Map how the site can connect to public transport such as buses, London Underground and National Rail routes
- Consider how the development can establish links between existing walking and cycling routes and surrounding public transport
- Where possible, collaborate with neighbouring sites to create new walking and cycling route

### 6.3.2 Assessing the impact of development on the transport network

To assess the impact of development on public transport it will be necessary to:

- a. Establish the accessibility level of a site using the [Public Transport Accessibility Levels \(PTAL\) rating](#). A development on a site with a high PTAL rating is unlikely to have a noticeable impact on existing transport services. Whereas a major development on a site with a low PTAL rating (normally 3 or below) may have difficulties relying on the existing public transport service.
- b. Conduct a trip generation exercise on [TRICS](#). This is the best way to understand the impact of development on the public transport network. This will show if the network has capacity to support an increase in journeys and allow the council to recommend the mitigation of any adverse impacts via S278 works, S106 contributions and other information.

Major developments will need to provide Transport Assessments and supporting documents to assess the impact of development on transport.

These supporting documents include:

- Travel Plans
- Transport Statements
- Movement Plans
- Delivery and Servicing Plans
- Car Parking Management Plans
- Construction Environment Management Plans
- Active Travel Zone Assessments
- Construction Logistics Plan
- Trip Generation Report
- Levels and Gradients Plan

A Movement Plan is a diagram that shows how different users, including pedestrians, cyclists and motorists, will arrive and depart from a site and move around within the site. The Plan should also show the location of infrastructure. This includes cycle routes and lanes, cycle hire docking stations, pedestrian routes and crossings. This may be as simple as a drawing which shows how different types of users/trips move around, to and from the site.

## **6.4 Shared transport and car clubs and reducing reliance on cars**

### **6.4.1 Reducing reliance on cars**

Southwark Plan 2022 policies support car-free development in all areas across the borough.

Car free development means that no parking spaces are provided as part of the development on site. New developments will also not have access to parking permits in any existing or future Controlled Parking Zones (CPZs). This is separate from any requirement to provide Blue Badge parking bays.



Car-free developments in accessible areas will help Southwark grow sustainably by reducing reliance on the private car. In some cases where public transport accessibility levels are lower, a limited amount of car parking may be needed. Car Clubs can be a good way of limiting the amount of space used on parking. Some developments will need to contribute towards a Car Club.

The provision of Car Club spaces and vehicles on-site will be secured via an S106 agreement. See S106 SPD for more information.

In some cases, it will be necessary to provide on-site car parking spaces and/or vehicular access for blue badge holders where required. A strategy should be provided which ensures that blue badge holder parking spaces are allocated based on need.

#### 6.4.2 Electric Vehicle Charging Points (EVCPs)

Electric Vehicle Charging Points (EVCPs) must be provided for every permitted parking space in a new development. This is in accordance with Southwark Plan 2022 Policy 'P54 Car parking' and London Plan Policy 'T6.1 Residential parking'.

Supporting electric vehicle use can be achieved by:

- Ensuring 20% of spaces and Disabled spaces are fitted with active EVCPs, and 80% are fitted with passive (not connected) EVCPs.
- Ensuring EVCPs are well designed and do not obstruct pavements or cause them to become inaccessible.
- Ensuring EVCPs are regularly maintained. This may be secured by a condition of planning permission.
- Specifying locations within the site layout plans and whether they are passive or active.

#### Best practice for EVCPs

Where a small number of parking spaces are provided, 100% active provision of EVCPs is encouraged.

Blue Badge parking bays should be prioritised for EVCPs.

# **CHAPTER 7**

## **WASTE MANAGEMENT & RECYCLING**

# 7. WASTE MANAGEMENT & RECYCLING

## 7.1 Management of domestic and commercial waste and recycling in new developments

This section provides detail on applying Southwark Plan 2022 policy 'P62 Reducing waste'. It also relates to the London Plan Policy 2021 'SI 7 Reducing waste and supporting the circular economy' which set out the policy requirements.

A Waste Management Statement (WMS) will need to be submitted for all full planning applications that would generate residential or commercial waste. This should contain a commitment to reducing waste generated on site. It should also commit to reusing and recycling construction, demolition and excavation waste.

## 7.2 Communal refuse facilities – Residential

[The waste management guidance notes for residential developments](#) set out the suitable types of waste storage and collection arrangements for residential developments

### Best practice for residential communal refuse facilities

#### Space provision

To help residents recycle where possible, there should be space for them to separate out waste into two different containers. One for recyclable and one for non-recyclable waste.

Purpose built flats should consider:

- Storage space including maturing areas
- Storage areas for communal food waste containers
- Storage space inside kitchens for seven litre containers
- Sufficient space to accommodate wormeries on balconies.

#### Storage specification

Purpose built flats should consider:

- On site in-vessel food waste digesters
- Food waste disposal units (underneath sinks)

Developments with gardens should consider providing composting facilities.

## 7.3 Communal refuse facilities – Commercial

### Location

- Storage of bins on public streets will not be supported.
- Storage areas for bins should be separate for non-residential and residential

### Space provision

- British Standard BS 5906:2005 should be used to calculate the capacity of waste storage needed. Where the end user of a building is not known, calculations should assume the highest levels of waste generation likely for that use class.

### Accessibility

- Recycling facilities should be as easy to access as waste facilities.
- In large developments, more than one waste container will need to be accommodated. The lift doors and adjacent lobby or corridor must be sized so that waste containers can be easily manoeuvred. In new buildings, storage containers should, wherever possible, allow movement of containers to the collection point without going through a building. (Unless it is a porch, garage or carport or other open covered space).
- Paths (between bin storage and collection point) should be level, unless the gradient falls away from the housing or chamber, in which case it should not exceed 1:12 (BS5906).
- Where collection vehicles must enter a development, there should be sufficient on-site turning circles or hammerheads. This is to allow safe manoeuvring and exit from the development.

### Storage specification

- Applicants will need to provide information on the expected waste to be generated by the proposed use and the frequency of collection. Applicants must also explain how the storage capacity provided is adequate, including for organic waste.
- Generally, enough space to store waste for a week should be provided.
- An operational waste management plan should be submitted with the application.

### Best practice for storage specification

In addition to the traditional container options, developers may wish to look at further options for storage of their waste pending collection.

Any non-standard collection methods of collection or storage of waste, e.g., use of compactors, vacuum-based technology, or roll-on, roll-off skips, should be discussed with our operations team prior to submitting a planning application.

## 7.4 Clinical or hazardous waste

Clinical waste includes anything containing bodily fluids or tissue (such as bandages, plasters, and incontinence pads), discarded drugs or needles. Clinical waste must be stored separately from all other waste. Normally clinical waste is sealed inside yellow, coded bags. Sharps (such as needles) are stored in special boxes.

Any development containing any sort of medical centre, dental surgery, veterinary surgery, assisted living, nursing home, or home or day centre for disabled people must have separate storage and collection arrangements for clinical and non-clinical waste.

## 7.5 Managing litter associated with hot food takeaway businesses

Measures may need to be put in place to reduce the litter associated with hot food takeaway business to ensure there is no unacceptable impact from litter on the amenity of the area.

### Best practice for hot food takeaways

Reduce litter from hot food takeaway by:

- Installing litter bins in the local area
- Commit to litter picking
- Put up advertising signage to encourage disposal of litter.





# Consultation plan

**Climate and Environment Supplementary  
Planning Document (SPD)**

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# 1. Introduction

The Climate and Environment SPD will encourage applicants to be more ambitious in their planning applications to address climate change by including best practice actions to help deliver net zero development in Southwark.

The guidance in this SPD is relevant to all development that requires a planning application above 1 unit (including refurbishment to existing buildings, extensions to existing buildings and landscaping work)

This SPD provides further guidance for applying the policies in the Southwark Plan 2022. It does not contain new policy. The SPD will be a material consideration with significant weight in determining a planning application.

This SPD covers a broad range of technical guidance, grouped into thematic chapters;

- Energy and sustainability standards
- Minimising flood risk and water efficiency
- Environmental protection and improving air quality
- Green Infrastructure, biodiversity and trees
- Movement and transport
- Avoiding waste and minimising landfill

## 1.1 The purpose and objectives of this plan

The process of preparing the SPD needs to involve local community groups, residents and landowners to ensure that it meets the needs of those living in Southwark.

The purpose of this consultation plan is to make sure that we involve local people in preparing these documents in a way that considers their needs. There are minimum legal requirements for consultation we need to follow, seen in sections 2 and 3 below.

## **2. How we are consulting**

We carry out consultation in accordance with our adopted Statement of Community Involvement (2022). This explains how we will consult local people in the preparation of planning policy documents. The following section sets out how we plan to meet the minimum statutory consultation requirements and how we will exceed these requirements where appropriate.

In the current stage of consultation, we will invite members of the public and other stakeholders to make representations on the draft Climate and Environment SPD.

Further details of the next steps are set out in section 5.

### 3. The timetable and methods of consultation

#### 3.1 Consultation timeframe

In accordance with Southwark's statement of community involvement (SCI), the draft SPD will be available for comment for a minimum of twelve weeks. Additional time will also be added to the consultation to account for the summer period.

The consultation will run from 7<sup>th</sup> August 2024 until 27<sup>th</sup> November 2024.

#### 3.2 Consultation methods

The documents will be published on the council's website and made available at the council's Tooley Street offices. An advert publicising the SPD consultation will be put in Southwark News and an email notification will be sent to around 30,000 contacts who have signed up for the Planning Policy mailing list.

The two tables below set out the statutory minimum requirements to meet Government regulations and the further additional consultation methods we intend to do. We include dates when we have meetings confirmed. We also set out the key consultee groups that the consultation method is aimed at.

Table 1: Statutory consultation

<b>METHOD OF CONSULTATION</b>	<b>CONSULTEE</b>	<b>DATE</b>	<b>COMMENTS</b>
Place the SPD on the council's website.	All	Consultation launch	Our website will continually be updated.
A hard copy of the SPD will be made available at 160 Tooley Street (the Council's offices)	All	Consultation launch	
Press notice in local newspaper advertising the beginning of the consultation.	All	Consultation launch	This will be in the Southwark News.

Email out to all statutory consultees on planning policy database	All on planning policy consultee database	Consultation launch	
Make a copy of the SPD available for an individual if requested	Individuals if requested	On request	

Table 2: Additional consultation

<b>METHOD OF CONSULTATION</b>	<b>CONSULTEE</b>	<b>DATE</b>	<b>COMMENTS</b>
Email out to all non-statutory consultees on planning policy mailing list. This will set out the timescale for consultation and how people can comment.	All on planning policy mailing list	Consultation launch	An email will be sent to the 30,000+ contacts who have signed up for the Planning Policy mailing list, as well as the groups identified in our SCI.
Officers will attend community meetings, where requested	All who attend the community meetings	Throughout consultation	
Presentation of the SPD to Planning committee	Planning committee	Throughout consultation	
Presentation at Southwark Youth parliament	Youth parliament members	Throughout consultation	
Email notifications to tenants and residents associations	TRA members	Throughout consultation	
Updates on the council's Twitter page	Twitter followers	Throughout consultation	
Place posters in all Southwark libraries. Assistance is available in libraries to those who need help making a comment on an SPD online.	Library users	Consultation launch	

## 4. How to comment

We welcome your comments on the draft SPD once public consultation has launched on 7<sup>th</sup> August 2024.

Please contact us if you want to know more about the documents or about our consultation.

All comments must be received by the consultation close date of 27<sup>th</sup> November 2024. Comments received after this date will not be considered.

Representations can be made by:

- Visiting our consultation website and submitting our online questionnaire. This will be made available once public consultation has launched.
- Sending an email to [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk)
- Alternatively, you can send your response to:

Planning Policy  
160 Tooley Street  
London  
SE1 2QH

## 5. What happens next?

This is the stage of consultation for the Climate and Environment SPD. Next steps for the policy document are set out below.

After consulting on this first draft of the SPD, we will collate all the feedback we receive and publish a final version of the plan for formal consultation. This will then be considered by Cabinet prior to adoption.

Table 3: Timeline of SPD

Stage of consultation	Consultation timescale
Public consultation of the draft SPD begins	7 <sup>th</sup> August 2024
Public consultation of the draft SPD concludes	27 <sup>th</sup> November 2024
Consideration of consultation responses	December 2024 / January 2025
Adoption of the SPD	May 2025



# **Equality Impact and Needs Analysis**

**Climate and Environment Supplementary  
Planning Document (SPD)**

**Section 1: Equality impact and needs analysis details**


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<b>Proposed policy/decision/business plan to which this equality analysis relates</b>	Climate and Environment Supplementary Planning Document
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<b>Equality analysis author</b>	James Holmes		
<b>Strategic Director:</b>	Clive Palfreyman		
<b>Department</b>	Planning Policy	<b>Division</b>	Planning and Growth
<b>Period analysis undertaken</b>	20 Feb 2024 to 23 Feb 2024		
<b>Date of review (if applicable)</b>	February 2025		
<b>Sign-off</b>		<b>Position</b>	
			<b>Date</b>



**Section 2: Brief description of policy/decision/business plan****1.1 Brief description of policy/decision/business plan**

Southwark declared a climate emergency in 2019. To help deliver this, the Southwark Plan 2022 sets ambitious climate and environmental policies which aim to reach net zero carbon by 2050.

The SPD will encourage applicants to be more ambitious in their planning applications to address climate change by including best practice actions to help deliver net zero development in Southwark.

This SPD has the following objectives;

- To help people better understand climate mitigation and adaptation actions
- To provides advice on how to make successful planning applications that are in line with the Council's climate and environment policies.
- To set out best practice for sustainable development in Southwark.

This SPD provides guidance for applying the policies in the Southwark Plan 2022. It does not contain new policy. The SPD will be a material consideration in the determination of a planning application.

The guidance in this SPD is relevant to all development that requires a planning application above 1 unit (including refurbishment to existing buildings, extensions to existing buildings and landscaping work). It is designed for a wide readership, including applicants, owners, residents, planners, community groups and developers.

This guidance provides detailed, technical guidance on each of the following topics:

- Energy and carbon reduction
- Overheating and Sustainability Standards
- Minimising flood risk and water efficiency
- Environmental protection and improving air quality
- Green Infrastructure, biodiversity and trees
- Movement and transport
- Avoiding waste and minimising landfill

**Section 3: Overview of service users and key stakeholders consulted**

<b>2. Service users and stakeholders</b>	
<b>Key users of the department or service</b>	<p>Externally, the key users of the SPD will be Southwark developers and individuals applying for planning permission. Other users may include planning agents, architects or those employed to make manage development in the borough.</p> <p>Internally, the SPD will be used by planning officers to assess planning applications.</p>
<b>Key stakeholders were/are involved in this policy/decision/business plan</b>	<p>The SPD was prepared and developed by the planning division, with input from planning policy and development management officers as well as other Council departments.</p> <p>The SPD has been reviewed by the Cabinet member for New Homes and Sustainable Development and will be taken to the Council's Cabinet on the 18th June 2024 to agree the SPD for public consultation.</p> <p>Members of the public will be able to give comments on the SPD at the consultation stage.</p>

## Section 4: Pre-implementation equality impact and needs analysis

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This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio-economic issues (levels of poverty, employment, income). As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantages.

### **Socio-economic disadvantage may arise from a range of factors, including:**

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantage

**The public sector equality duty (PSED)** requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of under-represented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future For All values: that we will

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

<p><b>Age</b> - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32-year-olds) or range of ages (e.g. 18 - 30 year olds).</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential Socio-Economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Climate change</u></p> <p>The SPD encourages applicants to be more ambitious in addressing climate change in their planning applications by providing sustainability standards and best practice examples. This includes guidance for new-build development as well as retrofitting.</p> <p>This will help applicants better understand climate mitigation and adaptation actions and will help deliver net zero development in Southwark. It will also improve the standard of development in the borough and provide higher quality homes.</p> <p>This will benefit residents of all ages in the borough.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD sets out the high standard of insulation and energy efficiency expected of development. A high standard of insulation and energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit residents of all ages in the borough. It may also have a particular benefit for older adults and young children as these groups are more vulnerable to the harmful effects of cold weather. Households with over-60s are also most likely to live with an excess cold hazard.</p>	<p>This could be of socio-economic benefit to young adults.</p> <p>This is because young adults are more likely to live in fuel poverty than any other adult age group.</p>

<p><u>Overheating</u></p> <p>The SPD provides guidance on managing the risk of overheating. This will help developments to be less susceptible to overheating and deliver a more liveable, comfortable standard of living.</p> <p>This will benefit residents of all ages in the borough. It may also have a particular benefit for older adults and young children as these groups are more vulnerable to overheating during hotter weather. Households with young children are also more likely to live in homes that are vulnerable to overheating.</p>	<p>This could be of socio-economic benefit to older adults and young children living in areas of deprivation. This is because these groups are more likely to live in homes that are vulnerable to overheating and the harmful effects.</p>
<p><u>Flood risk and resilience</u></p> <p>The guidance in the SPD will help to steer developments to the areas with the lowest risk of flooding, as far as possible. It will also help development to achieve a high level of flood resilience and resistance.</p> <p>This will benefit residents of all ages in the borough. It may also have a particular benefit for older adults who are more vulnerable to the risks of flooding.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Air quality</u></p> <p>The SPD sets out how to prevent and mitigate exposure to poor air quality. This will help to improve the air quality surrounding new developments. It will also reduce the impact of a new development on air quality and secure air quality improvements where necessary.</p> <p>This will benefit residents of all ages in the borough. It may also have a particular benefit for older adults and younger children as these groups are more likely to suffer from health problems linked to poor air quality.</p>	<p>This could be of socio-economic benefit to young children living in areas of deprivation.</p> <p>This is because young children living in areas of deprivation are particularly likely to live in an area with high levels of air pollution.</p>

<p><u>Noise</u></p> <p>The guidance in the SPD will help minimise exposure to high levels of noise in new developments. This includes operational noise, as well as noise from construction.</p> <p>This will benefit residents of all ages in the borough. It may also have a particular benefit for younger children as this group can be vulnerable to the harmful effects of noise pollution.</p>	<p>This could be of socio-economic benefit to young children living in areas of deprivation.</p> <p>This is because young children living in areas of deprivation are particularly likely to live in an area with high levels of noise pollution.</p>
<p><u>Road safety</u></p> <p>The guidance in the SPD will help new developments create safer streets, promote active travel and reduce the reliance on cars.</p> <p>This will benefit residents of all ages in the borough. It may also have a particular benefit for older adults, younger children and young adults (aged 16-30). Older adults and younger children are more vulnerable to being injured in a road traffic accident. Young adults are more frequently killed or seriously injured in road accidents in London than other age group.</p> <p>Creating safer streets with fewer cars will further benefit younger children as this group will be able to live more active and independent lives. This in turn should help improve the health of younger children.</p>	<p>This could be of socio-economic benefit to older adults, younger children and young adults (aged 16-30) living in deprived areas.</p> <p>This is because in addition to age, living in a deprived area is a known risk factor for road traffic accidents.</p>
<p><u>Urban greening</u></p> <p>The guidance in the SPD will help promote urban greening as part of new development. This may include significant new landscaping or small green spaces.</p> <p>This will benefit residents of all ages in the borough. It may also have a particular benefit for younger children. Time spent outside and in contact with nature is demonstrated to bring numerous and profound long-term benefits for younger children.</p>	<p>This could be of socio-economic benefit to young children living in areas of deprivation.</p> <p>This is because young children living in areas of deprivation are less likely to live in an area with access to green space.</p>

Equality information on which above analysis is based	Socio-Economic data on which above analysis is based
<p><u>General data</u></p> <p>The median age in Southwark is 33, which is below that of London as a whole (35). (Source: <a href="#">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p> <p>Southwark has an ageing population. Between 2011 and 2021, the proportion of Southwark residents aged 0-9 fell from 12.6% to 10.5%, while the proportion aged 50 and over rose from 20.4% to 24.7%. (Source: <a href="#">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p> <p>A 79% increase in the population of Southwark aged 65 or more is forecast by 2039. This incorporates a 92% increase in those over 75 and 87% growth in those over 85. (Source: Strategic Housing Market Assessment Update 2019 (Source: <a href="#">Housing - Southwark Council</a>)).</p>	<p>In 2021/22 approximately 23,000 children aged 0-15 in Southwark were living in poverty, after housing costs were factored in, equating to 36% of children in the borough. This is higher than the London average of 33%. (Source: <a href="#">JSNA Annual Report - Southwark Council</a>).</p> <p>Council wards with the highest proportions of child poverty (22-28%) include Old Kent Road, Faraday, North Walworth, Chaucer, and Borough and Bankside. Faraday ranks as the most deprived ward in Southwark. These areas overlap with the Old Kent Road, Elephant and Castle, and London Bridge/Bankside Opportunity Areas. (JSNA Annual Report 2023; JSNA Multiward Profiles 2023: West Central Southwark)</p>
<p><u>Energy efficiency</u></p> <p>Older people are more vulnerable to the harmful effects of cold weather. This is because they are more likely to have long-term health conditions that cold weather may exacerbate, and they have weaker immune systems which may be worsened by cold weather. Older adults are less likely to be aware that they are becoming too cold, so are more likely to suffer hypothermia and related conditions. In addition, older people and children are less able to adapt their behaviour in cold weather, for instance due to reduced mobility. (Sources: <a href="#">Supporting vulnerable people before and during cold weather: for adult social care managers - GOV.UK (www.gov.uk)</a>).</p> <p>The English Housing Survey found that households with over-60s are most likely to live with an excess cold hazard. Around</p>	<p>There is strong evidence linking poverty to heightened vulnerability to cold weather. This relates to poor quality homes and fuel poverty. (Source: <a href="#">Supporting vulnerable people before and during cold weather: for adult social care managers - GOV.UK (www.gov.uk)</a>). People with chronic obstructive pulmonary disease are more likely to live in poverty. (Source: <a href="#">Estimating the number of people with cardiovascular or respiratory conditions living in poverty, England - Office for National Statistics</a>).</p> <p>Nationally, households where the age of the oldest member is between 16 and 24 have the highest likelihood of being in fuel poverty (25%). No other adult age group exceeds 15%. (Source: <a href="#">Annual fuel poverty statistics</a>)</p>

<p>4.2% of households where the oldest person was aged 60 or over lived with an excess cold hazard, compared with 1.8% of households where the oldest person was aged under 60. (Source: <a href="#">Health inequalities: Cold or damp homes - House of Commons Library (parliament.uk)</a>).</p>	<p><a href="#">in England, 2024 (2023 data) (publishing.service.gov.uk)</a>).</p>
<p><u>Overheating</u></p> <p>Elderly people are particularly vulnerable to heatwaves and overheated homes. This is because they are less able to adjust well to changes in temperature, and are more likely to have chronic health conditions that increase their vulnerability. In addition, both the elderly and young children are generally less able to adapt their behaviour in hot weather, for instance because of reduced mobility.</p> <p>(Source: <a href="#">Staying safe in extreme heat - UK Health Security Agency (blog.gov.uk)</a>, <a href="#">Heat Stress in Older Adults   Natural Disasters and Severe Weather   CDC</a>).</p> <p>A recent study found that 61% of households in the UK in which the youngest inhabitant is under four years old are at risk of overheating, compared to an average of 36%. (Source: <a href="#">It's getting hot in here • Resolution Foundation</a>).</p>	<p>There is strong evidence linking poverty to heightened vulnerability to overheating. This relates to poorer quality homes, poorer social infrastructure, urban heat island effect, poorer health etc. A recent study found that 53% of households in the lowest income quintile are at risk of future overheating, compared to 18% of households in the highest income quintile. (Source: <a href="#">It's getting hot in here • Resolution Foundation</a>).</p> <p>In Southwark, areas with the greatest heat risk (considering both socio-economic and environmental factors) are located in the centre of the borough, which is also where levels of deprivation are highest. (Source: <a href="#">London Climate Risk Maps (arcgis.com)</a>; <a href="#">JSNA Annual Report - Southwark Council</a>).</p>
<p><u>Flood risk and resilience</u></p> <p>Older people are less likely than other social groups to respond to flood warnings and may be more reluctant to leave their houses. They also have more limited physical mobility, making it more difficult to use flood defence measures. (Source: <a href="#">Present and future flood vulnerability risk and disadvantage (climatejust.org.uk)</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Air quality</u></p> <p>Children living in London are particularly at risk of developing lifelong, chronic conditions due to air pollution. In addition, the health impacts of air pollution exposure continue well into old age, increasing the</p>	<p>The Greater London Authority Air Quality Exposure and Inequalities Study (2023) found that areas with higher levels of deprivation are more likely to be exposed to higher levels of</p>



<p>risk of various long-term health conditions and early death. (Source: <a href="#">Review highlights lifelong health impacts of air pollution   Imperial News   Imperial College London</a>)</p>	<p>air pollution. (Source: <a href="#">GLA LAEI AQ Exposure and Inequalities study Part 1 - London analysis</a>).</p> <p>Children who attend London schools that are worst affected by air pollution are disproportionately likely to be from deprived families. (Source: <a href="#">Poorest London children face health risks from toxic air, poverty and obesity   Air pollution   The Guardian</a>).</p>
<p><u>Noise</u></p> <p>High levels of noise pollution can be particularly damaging to children's physical and psychological health. It can affect the development of children's learning, hearing, memory, attention, and speech and language skills. (Source: <a href="#">Noise and Its Effects on Children (epa.gov)</a>, <a href="#">Traffic noise slows children's memory development, study finds   Pollution   The Guardian</a>).</p>	<p>Noise is more likely to be a problem for deprived communities, as they are more likely to live in noisy places close to road traffic or industry. (Source: <a href="#">Noise and vibration management: environmental permits - GOV.UK (www.gov.uk)</a>, <a href="#">Social Inequalities in Environmental Noise Exposure: A Review of Evidence in the WHO European Region - PMC (nih.gov)</a>).</p> <p>Within Southwark, the 'noise action planning important areas' are almost all in the centre or north of the borough, where the borough's most deprived neighbourhoods are located. (Source: <a href="#">Southwark Maps</a>).</p>
<p><u>Road safety</u></p> <p>Children are particularly vulnerable to road traffic accidents because of their limited physical, cognitive and social development. Because of their small stature, it can be difficult for children to see surrounding traffic and for drivers and others to see them. In addition, if they are involved in a road traffic crash, their softer heads make them more susceptible to serious head injury than adults. Young children are less able to judge the proximity and speed of vehicles and may be impulsive. (Source: <a href="#">Road traffic injuries: Children (World Health Organisation)</a>).</p> <p>Elderly people are similarly more vulnerable due to their slower mobility,</p>	<p>Almost twice as many people living in the most deprived 30 per cent of London are killed or seriously injured in road collisions than people living in the least deprived 30 per cent per 1,000 resident population.</p> <p>The GLA identified young men (aged 16-30) living in the most deprived 30 per cent of London, riding motorcycles as being the single highest risk community for road accidents in London (0.54 killed or seriously injured per 1,000 people). (Source: <a href="#">Inequalities in road danger in London 2017-2021 (tfl.gov.uk)</a>).</p>

<p>poorer sensory faculties, and general infirmness. (Source: <a href="#">Epidemiology of Road Traffic Injuries among Elderly People; A Systematic Review and Meta-Analysis - PMC (nih.gov)</a>).</p> <p>Per thousand people, young adults aged between 16 and 30 are more frequently killed or seriously injured, and slightly injured, than any other age group in London. (Source: <a href="#">Inequalities in road danger in London 2017-2021 (tfl.gov.uk)</a>).</p> <p>Studies show that children who live in walkable neighbourhoods are more physically active, more independent, and less likely to be overweight. (Source: <a href="#">Neighbourhoods for Active Kids: study protocol for a cross-sectional examination of neighbourhood features and children's physical activity, active travel, independent mobility and body size   BMJ Open, Associations between Children's Physical Activity and Neighborhood Environments Using GIS: A Secondary Analysis from a Systematic Scoping Review - PMC (nih.gov)</a>).</p>	
<p><u>Urban greening</u></p> <p>Evidence shows that the benefits of connecting with nature are especially profound for children. Children who spend time outside connecting with nature see improvements in school attendance, behaviour, academic achievement, and social skills like teamwork. (Source: <a href="#">Children &amp; Nature Programme: the importance of integrating time spent in nature at school - Natural England (blog.gov.uk)</a>). There is also a wealth of evidence showing that time spent in natural environments is beneficial for children's mental and physical health. (Source: <a href="#">Natural England: How the natural environment can support children and young people.pdf</a>).</p>	<p>Nationally, people on low incomes are less likely to live within a 5-minute walk of a green space (46% of those with an annual household income under £15,000 compared to 70% of people with an annual household income over £35,000), and less likely to live somewhere where the streets are green (27% compared to 53%). (Source: <a href="#">Out-of-Bounds-equity-in-access-to-urban-nature.pdf (groundwork.org.uk)</a>).</p> <p>The most deprived communities are more than twice as likely to live in areas with a low amount of natural space per person. (Source: <a href="#">Huge nature access gap must be bridged to meet Government's 15-minute nature promise (wcl.org.uk)</a>).</p>

	<p>Council wards with the highest proportions of children in poverty (22-28%) include Old Kent Road, Faraday, North Walworth, Chaucer, and Borough and Bankside. (Source: <a href="#">JSNA Annual Report - Southwark Council</a>). These areas largely score poorly for park provision and tree equity. (Sources: Southwark Open Space Strategy (2013); <a href="#">Spectrum Spatial (southwark.gov.uk)</a>).</p>
<b>Mitigating and/or improvement actions to be taken</b>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise</p>

**Disability** - 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.

Please note that under the PSED due regard includes:

Giving due consideration in all relevant areas to "the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities."

This also includes the need to understand and focus on different needs/impacts arising from different disabilities.

**Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.**

**Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)**

Climate change

The SPD encourages applicants to be more ambitious in addressing climate change in their planning applications by providing sustainability standards and best practice examples. This includes guidance for new-build development as well as retrofitting.

This will help applicants better understand climate mitigation and adaptation actions and will help deliver net zero development in Southwark. It will also improve the standard of development in the borough and provide higher quality homes.

This will benefit all residents in the borough, including those who are disabled.

No positive or negative socio-economic impact applicable.

Energy efficiency

The SPD sets out the high standard of insulation and energy efficiency expected of development. A high standard of insulation and energy

This could be of socio-economic benefit to those residents who are disabled.

<p>efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including those who are disabled. It may also have a particular benefit for residents with certain disabilities or health conditions who are more vulnerable to the harmful effects of cold weather.</p> <p>In addition, it may have a particular benefit for residents with restricted mobility, dementia or severe mental health issues, who are less able to adapt their behaviour during cold snaps.</p>	<p>This is because poverty and disability are both risk factors with regard to the harmful effects of cold weather. There is also a known link between disability and poverty.</p> <p>Disabled people are also more likely than non-disabled people to struggle to afford their energy bills.</p>
<p><u>Overheating</u></p> <p>The SPD provides guidance on managing the risk of overheating. This will help developments to be less susceptible to overheating and deliver a more liveable, comfortable standard of living.</p> <p>This will benefit all residents in the borough, including those who are disabled. It may also have a particular benefit for residents with certain health conditions or who are more mentally vulnerable to overheating.</p> <p>In addition, it may have a particular benefit for residents with restricted mobility, dementia or severe mental health issues, who are less able to adapt their behaviour during heatwaves.</p>	<p>This could be of socio-economic benefit to those residents who are disabled.</p> <p>This is because poverty and disability are both risk factors with regard to the harmful effects of overheating. There is also a known link between disability and poverty.</p>
<p><u>Flood risk and resilience</u></p> <p>The guidance in the SPD will help ensure new development takes place in areas at low risk of flooding as far as possible. It will also help ensure that new development achieves a high level of flood resilience.</p> <p>This will benefit all residents in the borough, including those who are disabled. It may particularly benefit the</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>large number of disabled residents in the middle of the borough as this is where flood risk is highest.</p>	
<p><u>Air quality</u></p> <p>The SPD sets out how to prevent and mitigate exposure to poor air quality. This will help to improve the air quality surrounding new developments. It will also reduce the impact of a new development on air quality and secure air quality improvements where necessary.</p> <p>This will benefit all residents in the borough, including those who are disabled. It may also have a particular benefit for residents with certain health conditions such as cardiovascular disease or respiratory diseases. This is because people with these health conditions are more vulnerable to the harmful effects of air pollution.</p>	<p>This could be of socio-economic benefit to residents with certain health conditions or disabilities living in areas of deprivation.</p> <p>This is because poverty and disability are both risk factors with regard to the harmful effects of poor air quality. There is also a known link between disability and poverty.</p>
<p><u>Noise</u></p> <p>The guidance in the SPD will help minimise exposure to high levels of noise in new developments. This includes operational noise, as well as noise from construction.</p> <p>This will benefit all residents in the borough, including those who are disabled.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Urban greening</u></p> <p>The guidance in the SPD will help promote urban greening as part of new development. This may include significant new landscaping or small green spaces.</p> <p>This will benefit for all residents in the borough, including those who are disabled. It may also have a particular benefit for those with restricted mobility who find it challenging to travel distances for green spaces. It may further have a particular benefit for those with certain mental health issues.</p>	<p>This could be of socio-economic benefit to disabled people living in deprived areas.</p> <p>This is because disability and living in a deprived area are both factors that are associated with poor access to greenspace. There is also a known link between disability and poverty.</p>

<p><u>Road safety</u></p> <p>The guidance in the SPD will help new developments create safer streets, promote active travel and reduce the reliance on cars.</p> <p>This will benefit for all residents in the borough, including those who are disabled. It may also be of particular benefit to residents with certain disabilities such as visual impairment, restricted mobility, or dementia. This is because people with these disabilities are more vulnerable to road traffic.</p>	<p>This could be of socio-economic benefit to disabled people living in deprived areas.</p> <p>This is because disability and living in a deprived area are both risk factors for road traffic accidents. There is also a known link between disability and poverty.</p>
<p><u>Inclusive and accessible streets</u></p> <p>The SPD provides guidance on creating inclusive and accessible streets for disabled people. This includes using tactile paving, tonal and colour contrast, and minimum widths between the kerb and buildings. This will help ensure that new development is accessible.</p> <p>This will benefit for all residents in the borough, including those who are disabled.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>In 2021, 8.2% of Southwark residents identified as being disabled and limited a lot. This was a decrease from 11.1% in 2011. Almost a quarter of households (33,000) had at least one resident with a disability. (Source: <a href="#">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p> <p>The neighbourhoods with higher proportions of disability are Old Kent Road, South Bermondsey and Nunhead &amp; Queen's Road. (Source: Census 2021, quoted in <a href="#">JSNA Annual Report - Southwark Council</a>).</p>	<p>In the 3 years to 2021/22, 33% of families in London that included a disabled person were in poverty compared to 22% of those without a disabled household member. (Source: <a href="#">Nearly half of everyone in poverty is either a disabled person or lives with a disabled person   Disability Rights UK</a>).</p>

<p><u>Energy efficiency</u></p> <p>There is strong evidence linking a range of health conditions to vulnerability to cold weather. These include cardiovascular conditions, and respiratory conditions such as chronic obstructive pulmonary disease and childhood asthma. Exposure to cold can increase the risk of blood clots forming in the body (in turn increasing the risk of heart attacks and strokes), increase susceptibility to chest infections, worsen breathing problems, and increase the risk of falls. (Source: <a href="https://www.gov.uk/government/publications/supporting-vulnerable-people-before-and-during-cold-weather">Supporting vulnerable people before and during cold weather: healthcare professionals</a> - GOV.UK (<a href="https://www.gov.uk">www.gov.uk</a>)).</p>	<p>There is strong evidence linking poverty to heightened vulnerability to cold weather. This relates to poor quality homes and fuel poverty. (Source: <a href="https://www.gov.uk/government/publications/supporting-vulnerable-people-before-and-during-cold-weather">Supporting vulnerable people before and during cold weather: for adult social care managers</a> - GOV.UK (<a href="https://www.gov.uk">www.gov.uk</a>)).</p> <p>According to ONS data from 2022, 55% of disabled adults in the UK reported finding it difficult to afford their energy bills. This compares with 40% of non-disabled people. (Source: <a href="https://ons.gov.uk/people-and-work/employment-and-unemployment/articles/impact-of-increased-cost-of-living-on-adults-across-great-britain">Impact of increased cost of living on adults across Great Britain</a> - Office for National Statistics (<a href="https://ons.gov.uk">ons.gov.uk</a>)). People with chronic obstructive pulmonary disease are more likely to live in poverty. (Source: <a href="https://ons.gov.uk/people-and-work/employment-and-unemployment/articles/estimating-the-number-of-people-with-cardiovascular-or-respiratory-conditions-living-in-poverty-england">Estimating the number of people with cardiovascular or respiratory conditions living in poverty, England</a> - Office for National Statistics).</p>
<p><u>Overheating</u></p> <p>There is strong evidence linking a range of health conditions to vulnerability to heatwaves. These include heart and lung conditions, diabetes, renal insufficiency, and Parkinson's disease. (Source: <a href="https://www.nhs.uk/health-topics/heat-exhaustion-and-heatstroke">Heat exhaustion and heatstroke</a> - NHS (<a href="https://www.nhs.uk">www.nhs.uk</a>)) (<a href="https://www.blog.gov.uk/2022/07/27/staying-safe-in-extreme-heat">Staying safe in extreme heat</a> - UK Health Security Agency (<a href="https://www.blog.gov.uk">blog.gov.uk</a>))</p>	<p>There is strong evidence linking poverty to heightened vulnerability to overheating. This relates to poorer quality homes, poorer social infrastructure, urban heat island effect, poorer health etc. A recent study found that 53% of households in the lowest income quintile are at risk of future overheating, compared to 18% of households in the highest income quintile. (Source: <a href="https://www.resolutionfoundation.org/en/insights/it-s-getting-hot-in-here">It's getting hot in here</a> • Resolution Foundation).</p> <p>In Southwark, areas with the greatest heat risk (considering both socio-economic and environmental factors) are located in the centre of the borough, which is also where levels of deprivation are highest. (Source: <a href="https://www.arcgis.com">London Climate Risk Maps</a> (<a href="https://www.arcgis.com">arcgis.com</a>); <a href="https://www.jsna.org.uk">JSNA Annual Report</a> - Southwark Council).</p>



<p><u>Flood risk and resilience</u></p> <p>People with various disabilities or long-term health conditions may struggle to adequately prepare for and respond to a flood. For example, due to restricted mobility or cognitive impairment. (Source: <a href="https://climatejust.org.uk">Present and future flood vulnerability risk and disadvantage (climatejust.org.uk)</a>). In Southwark, areas with the greatest flood risk (considering both socio-economic and environmental factors) are located in the centre of the borough, which is also where the wards with the highest proportions of disabled residents are located. (Source: <a href="https://arcgis.com">London Climate Risk Maps (arcgis.com)</a>; <a href="#">JSNA Annual Report - Southwark Council</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Air quality</u></p> <p>There is strong scientific evidence that people living with cardiovascular or respiratory disease are more vulnerable to the harm caused by air pollution. For example, it can result in increased risk of heart attack or stroke. (Source: <a href="#">Air pollution   British Heart Foundation - BHF</a>).</p> <p>In 2021/2022, in Southwark there were 4,250 residents diagnosed with chronic respiratory disease, 4,350 residents diagnosed with secondary prevention of coronary heart disease, and 14,700 residents diagnosed with asthma. (Source: <a href="#">JSNA Annual Report - Southwark Council</a>).</p>	<p>The Greater London Authority Air Quality Exposure and Inequalities Study (2023) found that areas with higher levels of deprivation are more likely to be exposed to higher levels of air pollution. (Source: <a href="#">Air quality exposure and inequalities study - part one - London analysis.pdf</a>).</p> <p>The same findings have been drawn by national studies (Source: <a href="#">Deprived communities in England experience higher emissions of air pollution - News and events, University of York</a>), (<a href="#">Urban outdoor air quality (parliament.uk)</a>).</p>
<p><u>Urban greening</u></p> <p>There is quantitative evidence that people with disabilities or long-term illness are more likely to have infrequent contact with greenspace. (Source: <a href="#">Improving access to greenspace: 2020 review (publishing.service.gov.uk)</a>).</p>	<p>Nationally, people on low incomes are less likely to live within a 5-minute walk of a green space (46% of those with an annual household income under £15,000 compared to 70% of people with an annual household income over £35,000), and less likely to live somewhere where the streets are green (27% compared to 53%). (Source: <a href="#">Out</a></p>

<p>Studies show that access to greenspace can be particularly beneficial for people experiencing mental health issues such as depression, anxiety, and dementia. (Source: <a href="#">The importance of greenspace for mental health - PMC (nih.gov)</a>, <a href="#">Green spaces do wonders for your mental health - Oxford Health NHS Foundation Trust</a>).</p> <p>.</p>	<p><a href="#">of Bounds - Equity in Access to Urban Nature (Published by Groundwork UK)</a> ).</p> <p>The most deprived communities are more than twice as likely to live in areas with a low amount of natural space per person. (Source: <a href="#">Huge nature access gap must be bridged to meet Government's 15-minute nature promise (wcl.org.uk)</a>).</p>
<p><u>Road safety</u></p> <p>In general terms, disabled people are at higher risk of pedestrian injuries of fatalities. (Source: <a href="#">Disability and pedestrian road traffic injury: A scoping review - ScienceDirect</a>).</p> <p>.</p>	<p>Almost twice as many people living in the most deprived 30 per cent of London are killed or seriously injured in road collisions than people living in the least deprived 30 per cent per 1,000 resident population. (Source: <a href="#">Inequalities in road danger in London 2017-2021 (tfl.gov.uk)</a>).</p>
<b>Mitigating and/or improvement actions to be taken</b>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

<p><b>Gender reassignment</b> - The process of transitioning from one gender to another.</p> <p><b>Gender Identity</b> - Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Climate change</u></p> <p>The SPD encourages applicants to be more ambitious in addressing climate change in their planning applications by providing sustainability standards and best practice examples. This includes guidance for new-build development as well as retrofitting.</p> <p>This will help applicants better understand climate mitigation and adaptation actions and will help deliver net zero development in Southwark. It will also improve the standard of development in the borough and provide higher quality homes.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD sets out the high standard of insulation and energy efficiency expected of development. A high standard of insulation and energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Overheating</u></p> <p>The SPD provides guidance on managing the risk of overheating. This will help developments to be less susceptible to overheating and deliver a more liveable, comfortable standard of living.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>Flood risk and resilience</u></p> <p>The guidance in the SPD will help ensure new development takes place in areas at low risk of flooding as far as possible. It will also help ensure that new development achieves a high level of flood resilience.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Air quality</u></p> <p>The SPD sets out how to prevent and mitigate exposure to poor air quality. This will help to improve the air quality surrounding new developments. It will also reduce the impact of a new development on air quality and secure air quality improvements where necessary.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Noise</u></p> <p>The guidance in the SPD will help minimise exposure to high levels of noise in new developments. This includes operational noise, as well as noise from construction.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Urban greening</u></p> <p>The guidance in the SPD will help promote urban greening as part of new development. This may include significant new landscaping or small green spaces.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Road safety</u></p> <p>The guidance in the SPD will help new developments create safer streets, promote active travel and reduce the reliance on cars.</p> <p>This will benefit all residents in the borough, including those of all gender identities.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>Safe streets</u></p> <p>The SPD provides guidance on creating safer streets. This involves measures such as lighting, passive surveillance and high levels of street activity.</p> <p>This will benefit all residents in the borough, including those of all gender identities. It may also be of particular benefit to transgender and gender non-conforming residents who are particularly vulnerable to violence in public spaces.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Equality information on which above analysis is based.</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>1.23% of people aged 16 years and over in Southwark have a gender identity different from their sex registered at birth. (Census 2021)</p> <p>8.1% of people in the Burgess Park area have reported a gender identity different from their sex registered at birth. This is the highest figure of any area (medium super output area) in England and Wales. (Census 2021)</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Safe streets</u></p> <p>Nationwide, 41% of trans people and 31% of non-binary people have experienced a hate crime or incident because of their gender identity in the last 12 months. (Source: <a href="#">Stonewall   LGBT in Britain - Trans Report (2017)</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

<p><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 couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. <b>(Only to be considered in respect to the need to eliminate discrimination.)</b></p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Climate change</u> The SPD encourages applicants to be more ambitious in addressing climate change in their planning applications by providing sustainability standards and best practice examples. This includes guidance for new-build development as well as retrofitting.</p> <p>This will help applicants better understand climate mitigation and adaptation actions and will help deliver net zero development in Southwark. It will also improve the standard of development in the borough and provide higher quality homes.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD sets out the high standard of insulation and energy efficiency expected of development. A high standard of insulation and energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Overheating</u></p> <p>The SPD provides guidance on managing the risk of overheating. This will help developments to be less susceptible to overheating and</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>deliver a more liveable, comfortable standard of living.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses.</p>	
<p><u>Flood risk and resilience</u></p> <p>The guidance in the SPD will help ensure new development takes place in areas at low risk of flooding as far as possible. It will also help ensure that new development achieves a high level of flood resilience.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Air quality</u></p> <p>The SPD sets out how to prevent and mitigate exposure to poor air quality. This will help to improve the air quality surrounding new developments. It will also reduce the impact of a new development on air quality and secure air quality improvements where necessary.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Noise</u></p> <p>The guidance in the SPD will help minimise exposure to high levels of noise in new developments. This includes operational noise, as well as noise from construction.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Urban greening</u></p> <p>The guidance in the SPD will help promote urban greening as part of new development. This may include significant new landscaping or small green spaces.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>Road safety</u></p> <p>The guidance in the SPD will help new developments create safer streets, promote active travel and reduce the reliance on cars.</p> <p>This will benefit all residents in the borough, including those of all marriage statuses.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>The latest census found that 26.9% of Southwark residents were married or in a civil partnership. This was a fall from 29.4% in 2011. Southwark had the fourth-highest percentage of adults who had never been married or in a civil partnership of all English local authorities. The proportion of residents who are married or in a civil partnership is significantly higher in the south of the borough than the north. (Source: <a href="https://ons.gov.uk">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Mitigating or improvement actions to be taken</b></p>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>



<p><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.</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Climate change</u></p> <p>The SPD encourages applicants to be more ambitious in addressing climate change in their planning applications by providing sustainability standards and best practice examples. This includes guidance for new-build development as well as retrofitting.</p> <p>This will help applicants better understand climate mitigation and adaptation actions and will help deliver net zero development in Southwark. It will also improve the standard of development in the borough and provide higher quality homes.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD sets out the high standard of insulation and energy efficiency expected of development. A high standard of insulation and energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity. It may also have a particular benefit for pregnant residents as these groups are more vulnerable to the harmful effects of cold weather.</p>	<p>This could be of socio-economic benefit to those residents who are pregnant.</p> <p>This is because poverty and pregnancy are both risk factors with regard to the harmful effects of cold weather.</p>

<p><u>Overheating</u></p> <p>The SPD provides guidance on managing the risk of overheating. This will help developments to be less susceptible to overheating and deliver a more liveable, comfortable standard of living.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity. This may also be of particular benefit to pregnant residents as these groups may be vulnerable to overheating.</p>	<p>This could be of socio-economic benefit to pregnant residents living in areas of deprivation.</p> <p>This is because these groups are more likely to live in homes that are vulnerable to overheating and the harmful effects.</p>
<p><u>Flood risk and resilience</u></p> <p>The guidance in the SPD will help ensure new development takes place in areas at low risk of flooding as far as possible. It will also help ensure that new development achieves a high level of flood resilience.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Air quality</u></p> <p>The SPD sets out how to prevent and mitigate exposure to poor air quality. This will help to improve the air quality surrounding new developments. It will also reduce the impact of a new development on air quality and secure air quality improvements where necessary.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity. It may also be of particular benefit to pregnant residents due to the unique impact of air pollution exposure. This can impact the health of the pregnant person and fetal development.</p>	<p><u>Air quality</u></p> <p>This could be of socio-economic benefit to pregnant residents living in areas of deprivation.</p> <p>This is because these groups are more vulnerable to the harmful effects of air pollution and more likely to live in areas with poor air quality.</p>

<p><u>Noise</u></p> <p>The guidance in the SPD will help minimise exposure to high levels of noise in new developments. This includes operational noise, as well as noise from construction.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Urban greening</u></p> <p>The guidance in the SPD will help promote urban greening as part of new development. This may include significant new landscaping or small green spaces.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Road safety</u></p> <p>The guidance in the SPD will help new developments create safer streets, promote active travel and reduce the reliance on cars.</p> <p>This will benefit all residents in the borough, including those who are pregnant or in maternity.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>The total number of babies born in Southwark has been decreasing year on year over the past 10 years. The decline in the fertility rate in Southwark is seen across all age groups, but particularly among younger women. The average age of mothers giving birth in Southwark in 2022 was around 33 years. (Source: <a href="#">JSNA Annual Report - Southwark Council</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>Energy Efficiency</u></p> <p>Pregnant women are more vulnerable to the harmful effects of cold weather. Evidence suggests exposure to extreme cold during pregnancy increases the risk of pre-term pregnancy. Pregnant women have weakened immune systems so are more likely to contract a viral disease such as the flu, which spread more easily in winter.</p> <p>(Source: <a href="#">Supporting vulnerable people before and during cold weather: for adult social care managers - GOV.UK (www.gov.uk)</a>; <a href="#">Extreme temperatures could increase preterm birth risk   National Institutes of Health (NIH)</a>; <a href="#">Cold weather and pregnancy   Pregnancy, Your pregnancy week by week articles &amp; support   NCT</a>).</p>	<p>There is strong evidence linking poverty to heightened vulnerability to cold weather. This relates to poor quality homes and fuel poverty. (Source: People with chronic obstructive pulmonary disease are more likely to live in poverty. (Source: <a href="#">Estimating the number of people with cardiovascular or respiratory conditions living in poverty, England - Office for National Statistics</a>)</p>
<p><u>Overheating</u></p> <p>Pregnant women are likely to suffer heat exhaustion, heat stroke, or other heat-related illness sooner than non-pregnant women. This is because their bodies must work harder to cool down both the pregnant woman's body and the developing baby. Pregnant women are also more likely to become dehydrated. This also means they won't be able to cool themselves as well by sweating.</p> <p>(Source: <a href="#">Heat and Pregnancy   Extreme Heat   CDC</a>).</p>	<p>There is strong evidence linking poverty to heightened vulnerability to overheating. This relates to poorer quality homes, poorer social infrastructure, urban heat island effect, poorer health etc. A recent study found that 53% of households in the lowest income quintile are at risk of future overheating, compared to 18% of households in the highest income quintile.</p> <p>(Source: <a href="#">It's getting hot in here • Resolution Foundation</a>). In Southwark, areas with the greatest heat risk (considering both socio-economic and environmental factors) are located in the centre of the borough, which is also where levels of deprivation are highest. (Source: <a href="#">London Climate Risk Maps (arcgis.com)</a>; <a href="#">JSNA Annual Report - Southwark Council</a>).</p>

<p><u>Air quality</u></p> <p>Air pollution exposure during fetal development and early childhood can have long-term impacts on health in childhood in beyond. Air pollution exposure may also increase risks for maternal health, and has been linked to increased risk of pre-eclampsia, a serious cardiovascular condition of pregnancy.</p> <p>(Source: <a href="#">UK Government must stop ignoring impact of air pollution in pregnancy and set air quality targets which protect the health of future generations   RCOG</a>, <a href="#">Air pollution and pregnancy   Tommy's (tommys.org)</a>).</p>	<p>The Greater London Authority Air Quality Exposure and Inequalities Study (2023) found that areas with higher levels of deprivation are more likely to be exposed to higher levels of air pollution. (Source: <a href="#">GLA LAEI AQ Exposure and Inequalities study Part 1 - London analysis</a>). The same findings have been drawn by national studies</p> <p>(Sources: <a href="#">Deprived communities in England experience higher emissions of air pollution - News and events, University of York</a>; <a href="#">Urban outdoor air quality (parliament.uk)</a>).</p>
<b>Mitigating and/or improvement actions to be taken</b>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

<p><b>Race</b> - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Climate change</u></p> <p>The SPD encourages applicants to be more ambitious in addressing climate change in their planning applications by providing sustainability standards and best practice examples. This includes guidance for new-build development as well as retrofitting.</p> <p>This will help applicants better understand climate mitigation and adaptation actions and will help deliver net zero development in Southwark. It will also improve the standard of development in the borough and provide higher quality homes.</p> <p>This will benefit all residents in the borough, including those of all ethnicities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD sets out the high standard of insulation and energy efficiency expected of development. A high standard of insulation and energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including those of all ethnicities. This may also be of particular benefit to Bangladeshi, Black and Pakistani households as they are more likely to live in cold homes.</p>	<p>This could be of socio-economic benefit to ethnic minority residents.</p> <p>Ethnic minority households are more likely to experience deprivation and disadvantage. As such, these groups are more likely to live in homes that are vulnerable to cold weather and the harmful effects.</p> <p>Ethnic minority households are also more likely to live in fuel poverty than white households.</p>

<p><u>Overheating</u></p> <p>The SPD provides guidance on managing the risk of overheating. This will help developments to be less susceptible to overheating and deliver a more liveable, comfortable standard of living.</p> <p>This will benefit all residents in the borough, including those of all ethnicities. This may also be of particular benefit to Black residents. This is because the areas in Southwark with the greatest heat risk are in the centre of the borough and this is also where Southwark's largest Black communities are located.</p>	<p>This could be of socio-economic benefit to ethnic minority residents.</p> <p>Ethnic minority households are more likely to experience deprivation and disadvantage. As such, these groups are more likely to live in homes that are vulnerable to overheating and the harmful effects.</p> <p>This is because the areas in Southwark with the greatest heat risk are in the centre of the borough are also where levels of deprivation are highest.</p>
<p><u>Flood risk and resilience</u></p> <p>The guidance in the SPD will help ensure new development takes place in areas at low risk of flooding as far as possible. It will also help ensure that new development achieves a high level of flood resilience.</p> <p>This will benefit all residents in the borough, including those of all ethnicities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Air quality</u></p> <p>The SPD sets out how to prevent and mitigate exposure to poor air quality. This will help to improve the air quality surrounding new developments. It will also reduce the impact of a new development on air quality and secure air quality improvements where necessary.</p> <p>This will benefit all residents in the borough, including those of all ethnicities. It may be of particular benefit to ethnic minorities as these groups were found at national and London-wide level to be more likely exposed to high levels of air pollution.</p> <p>Air pollution in the borough is also most severe in the centre and north of the borough, where is where Southwark's most ethnically diverse communities are located.</p>	<p>This could be of socio-economic benefit to ethnic minority residents.</p> <p>Ethnic minority households are more likely to experience deprivation and disadvantage. As such, these groups are more vulnerable to the harmful effects of air pollution and more likely to live in areas with poor air quality.</p> <p>This is because high levels of air pollution are seen disproportionately in areas with high levels of deprivation, as well as areas with large ethnic minority communities.</p>

<p><u>Noise</u></p> <p>The guidance in the SPD will help minimise exposure to high levels of noise in new developments. This includes operational noise, as well as noise from construction.</p> <p>This will benefit all residents in the borough, including those of all ethnicities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Urban greening</u></p> <p>The guidance in the SPD will help promote urban greening as part of new development. This may include significant new landscaping or small green spaces.</p> <p>This will benefit all residents in the borough, including those of all ethnicities. This may also in particular benefit ethnic minorities as these groups are less likely to be able to access green space where they live.</p> <p>Areas with large Black and Asian communities have been found to have a below-average provision of green space and urban greening.</p>	<p>This could be of socio-economic benefit to ethnic minority residents.</p> <p>Ethnic minority households are more likely to experience deprivation and disadvantage. These areas of deprivation tend to have less access to green space.</p>
<p><u>Road safety</u></p> <p>The guidance in the SPD will help new developments create safer streets, promote active travel and reduce the reliance on cars.</p> <p>This will benefit all residents in the borough, including those of all ethnicities.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Language</u></p> <p>Those who speak English as a second language may find it challenging to understand the guidance provided in the SPD. This means the guidance in the SPD could be less of a benefit to those residents who speak English as a second language.</p>	<p>No positive or negative socio-economic impact applicable.</p>



Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<p><u>General data</u></p> <p>Southwark is a very ethnically diverse borough. In 2021, 51.4% of residents identified as white (a decrease from 54.2% in 2011). 25.1% identified as 'Black, Black British, Black Welsh, Caribbean or African'. 9.9% identified as 'Asian, Asian British or Asian Welsh'. 6.3% identified as 'Arab of any other ethnic group'. (Source: <a href="https://ons.gov.uk">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>)</p> <p>Areas (medium super output areas) in Southwark with the highest proportions of Black residents include Peckham Park Road (48.8%), Burgess Park (38.7%) and South Bermondsey West (31.7%). In addition, the area with the highest proportion of residents identifying as 'other ethnic group' is Burgess Park (15.6%). These areas overlap with the Old Kent Road Opportunity Area. The Areas with the highest proportions of Asian residents are Elephant and Castle (21%) and Borough and Southwark Street (19%). These areas overlap with the Elephant and Castle and London Bridge/Bankside Opportunity Areas. (Source: <a href="#">Ethnic group - Census Maps, ONS</a>).</p>	<p>Data shows that ethnic minority residents are more likely to experience deprivation and disadvantage. For example, 72% of Southwark households consisting of only Black residents experience disadvantage, compared with 45% of households consisting solely of White residents. Similarly, there are clear differences in health outcomes between ethnic groups. (Source: <a href="#">JSNA Annual Report - Southwark Council</a>).</p> <p>Within Southwark, the areas with the highest levels of deprivation are largely in the centre of the borough. Council wards with the highest levels of deprivation include St George's, North Walworth, and Faraday. (Source: <a href="#">JSNA Annual Report - Southwark Council</a>). These areas are also home to large Black, Asian, and 'other ethnicity' communities. (Source: <a href="#">Ethnic group - Census Maps, ONS</a>).</p>
<p><u>Energy efficiency</u></p> <p>Research by the Joseph Rowntree Foundation has found that 17%, 11%, and 8% of households headed by someone Bangladeshi, Black and Pakistani respectively are not kept adequately warm. 5% of households headed by someone White are not kept adequately warm. (Source: <a href="https://jrf.org.uk">Ethnicity and the heightened risk of very deep poverty   Joseph Rowntree Foundation (jrf.org.uk)</a>).</p>	<p>In the 2 years to March 2021, an average of 12.6% of white households were in fuel poverty, compared with 19.1% of households from all other ethnic groups combined. (Source: <a href="https://ethnicity-facts-figures.service.gov.uk">Fuel poverty - GOV.UK Ethnicity facts and figures (ethnicity-facts-figures.service.gov.uk)</a>)</p>

<p><u>Overheating</u></p> <p>A recent study found that 55% of ethnic minority households in England live in homes that are at high risk of overheating, compared to a national average of 36%. (Source: <a href="#">It's getting hot in here • Resolution Foundation</a>). In Southwark, areas with the greatest heat risk (considering both socio-economic and environmental factors) are located in the centre of the borough, which is also where Southwark's largest Black communities are located. (Source: <a href="#">London Climate Risk Maps (arcgis.com)</a>; <a href="#">Ethnic group - Census Maps, ONS</a>).</p>	<p><u>Overheating</u></p> <p>There is strong evidence linking poverty to heightened vulnerability to overheating. This relates to poorer quality homes, poorer social infrastructure, urban heat island effect, poorer health etc. A recent study found that 53% of households in the lowest income quintile are at risk of future overheating, compared to 18% of households in the highest income quintile. (Source: <a href="#">It's getting hot in here • Resolution Foundation</a>). In Southwark, areas with the greatest heat risk (considering both socio-economic and environmental factors) are located in the centre of the borough, which is also where levels of deprivation are highest. (Source: <a href="#">London Climate Risk Maps (arcgis.com)</a>; <a href="#">JSNA Annual Report - Southwark Council</a>).</p>
<p><u>Air quality</u></p> <p>The Greater London Authority Air Quality Exposure and Inequalities Study (2023) found that areas with a high proportion of Black, Mixed/Multiple ethnicities, and Other ethnicity (including Arab) communities were significantly more likely to suffer from levels of NO<sub>2</sub> above EU limits.</p> <p>(Source: <a href="#">GLA LAEI AQ Exposure and Inequalities study Part 1 - London analysis</a>). The same results have been found at national level (Sources: <a href="#">Ethnic minorities and deprived communities hardest hit by air pollution   Imperial News   Imperial College London</a>; <a href="#">Urban outdoor air quality (parliament.uk)</a>).</p> <p>Data from the London Atmospheric Emissions Inventory shows that levels of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> are lowest in the south of the borough, and become progressively higher towards the north-west of the borough. Similarly, Southwark's Air Quality Focus Areas are all in the centre or north of the borough,</p>	<p>The Greater London Authority Air Quality Exposure and Inequalities Study (2023) found that areas with higher levels of deprivation are more likely to be exposed to higher levels of air pollution. (Source: <a href="#">GLA LAEI AQ Exposure and Inequalities study Part 1 - London analysis</a>). The same findings have been drawn by national studies (Sources: <a href="#">Deprived communities in England experience higher emissions of air pollution - News and events, University of York</a>; <a href="#">Urban outdoor air quality (parliament.uk)</a>).</p>

<p>and are concentrated in the north-west. These are areas that exceed the EU annual mean limit value for NO<sub>2</sub> and have high human exposure.</p> <p>(Sources: <a href="#">Southwark Air Quality Action Plan</a>; <a href="#">London Atmospheric Emissions Inventory (LAEI) 2019 Air Quality Focus Areas - London Datastore</a>).</p> <p>Medium super output areas with the highest proportion of Black residents are in the centre of the borough. These include Burgess Park (37.8% Black) and Camberwell Green (38.6% Black). These areas overlap with air quality focus areas (A2 Old Kent Road from East Street to Trafalgar Avenue, and Walworth Road/Camberwell Road/Camberwell Green).</p> <p>Medium super output areas with the highest proportions of Asian residents are in the north-west of the borough. These are Elephant &amp; Castle (21% Asian) and Borough &amp; Southwark Street (19% Asian). These overlap with two air quality focus areas (Elephant and Castle to St George's Circus and Kennington Lane, and London Bridge at Borough High Street). (Source: <a href="#">Ethnic group - Census Maps, ONS</a>).</p>	
<p><u>Urban greening</u></p> <p>Nationally, in areas where over 40% of residents are black or minority ethnic there is 11 times less green space than in areas where residents are largely white. (Source: <a href="#">Community green: using local spaces to tackle inequality and improve health</a>). In England, Black people are nearly four times as likely as White people to have no access to outdoor space at home.</p> <p>(Source: <a href="#">One in eight British households has no garden - Office for National Statistics (ons.gov.uk)</a>). People from ethnic minority backgrounds are less</p>	<p>Nationally, people on low incomes are less likely to live within a 5-minute walk of a green space (46% of those with an annual household income under £15,000 compared to 70% of people with an annual household income over £35,000), and less likely to live somewhere where the streets are green (27% compared to 53%). (Source: <a href="#">Out of Bounds Equity in Access to Urban Nature - Published by Groundwork UK</a>). The most deprived communities are more than twice as likely to live in areas with a low amount of natural space per person. (Source:</p>

<p>likely to live within a 5-minute walk of a green space than people that identify as White (39% compared to 58%). (Source: <a href="#">Out-of-Bounds-equity-in-access-to-urban-nature.pdf (groundwork.org.uk)</a>).</p> <p>A study by Atkins for Southwark's Open Space Strategy (2013) found that Bermondsey and Old Kent Road, Elephant and Castle, and Bankside Borough and London Bridge areas all had a level of park provision below borough standard.</p> <p>Southwark Maps shows that the local super output areas with the lowest tree equity scores are mainly within the London Bridge/Bankside and Old Kent Road Opportunity Areas. (Source: <a href="#">Spectrum Spatial (southwark.gov.uk)</a>).</p>	<p><a href="#">Huge nature access gap must be bridged to meet Government's 15-minute nature promise (wcl.org.uk)</a>.</p>
<p><u>Languages</u></p> <p>244,000 (79%) Southwark residents reported their main language to be English. This is comparable to London, where 76% of residents recorded English as their main language, but lower than across England (88% of the population).</p> <p>Spanish is the most common main language other than English, spoken by 13,000 Southwark residents. 'All other Chinese' is the most common Asian language, while Somali is the most spoken African language of Southwark residents.</p> <p>Of the 53,700 Southwark residents whose main language is not English, 10,200 (19%) cannot speak English well or have no English proficiency. (Source: <a href="#">Southwark Demographics - Southwark Council</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>

<b>Mitigating and/or improvement actions to be taken</b>	
<p>Those who speak English as a second language may find it challenging to understand the guidance provided in the SPD. This means the guidance in the SPD could be less of a benefit to those residents who speak English as a second language.</p> <p>Of the 53,700 Southwark residents whose main language is not English, 10,200 (19%) cannot speak English well or have no English proficiency.</p> <p>To mitigate this, the Council can translate the SPD into different languages upon request. The SPD has further adhered to Hemingway Plain English guidelines to ensure the text is as accessible as practical.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

<p><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.</p>	
<p><b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b></p>	<p><b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b></p>
<p><u>Climate change</u></p> <p>The SPD encourages applicants to be more ambitious in addressing climate change in their planning applications by providing sustainability standards and best practice examples. This includes guidance for new-build development as well as retrofitting.</p> <p>This will help applicants better understand climate mitigation and adaptation actions and will help deliver net zero development in Southwark. It will also improve the standard of development in the borough and provide higher quality homes.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD sets out the high standard of insulation and energy efficiency expected of development. A high standard of insulation and energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>Overheating</u></p> <p>The SPD provides guidance on managing the risk of overheating. This will help developments to be less susceptible to overheating and deliver a more liveable, comfortable standard of living.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Flood risk and resilience</u></p> <p>The guidance in the SPD will help ensure new development takes place in areas at low risk of flooding as far as possible. It will also help ensure that new development achieves a high level of flood resilience.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Air quality</u></p> <p>The SPD sets out how to prevent and mitigate exposure to poor air quality. This will help to improve the air quality surrounding new developments. It will also reduce the impact of a new development on air quality and secure air quality improvements where necessary.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Noise</u></p> <p>The guidance in the SPD will help minimise exposure to high levels of noise in new developments. This includes operational noise, as well as noise from construction.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>Urban greening</u></p> <p>The guidance in the SPD will help promote urban greening as part of new development. This may include significant new landscaping or small green spaces.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Road safety</u></p> <p>The guidance in the SPD will help new developments create safer streets, promote active travel and reduce the reliance on cars.</p> <p>This will benefit all residents in the borough, including those of all religious and belief groups.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>The latest census found that 43.3% of Southwark residents identify as Christian and 9.6% identify as Muslim. 36.4% identify as having no religion. (Source: <a href="https://www.ons.gov.uk/peoplepopulationandcommunity/religiousandethnicity/articles/how-life-has-changed-in-southwark-census-2021">How life has changed in Southwark: Census 2021 (ons.gov.uk)</a>).</p>	
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>



<b>Sex</b> - A man or a woman.	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b>	<b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b>
<p><u>Climate change</u></p> <p>The SPD encourages applicants to be more ambitious in addressing climate change in their planning applications by providing sustainability standards and best practice examples. This includes guidance for new-build development as well as retrofitting.</p> <p>This will help applicants better understand climate mitigation and adaptation actions and will help deliver net zero development in Southwark. It will also improve the standard of development in the borough and provide higher quality homes.</p> <p>This will benefit all residents in the borough, including both men and women.</p>	No positive or negative socio-economic impact applicable.
<p><u>Energy efficiency</u></p> <p>The SPD sets out the high standard of insulation and energy efficiency expected of development. A high standard of insulation and energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including both men and women.</p>	No positive or negative socio-economic impact applicable.
<p><u>Overheating</u></p> <p>The SPD provides guidance on managing the risk of overheating. This will help developments to be less susceptible to overheating and deliver a more liveable, comfortable standard of living.</p> <p>This will benefit all residents in the borough, including both men and women.</p>	No positive or negative socio-economic impact applicable.

<p><u>Flood risk and resilience</u></p> <p>The guidance in the SPD will help ensure new development takes place in areas at low risk of flooding as far as possible. It will also help ensure that new development achieves a high level of flood resilience.</p> <p>This will benefit all residents in the borough, including both men and women.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Air quality</u></p> <p>The SPD sets out how to prevent and mitigate exposure to poor air quality. This will help to improve the air quality surrounding new developments. It will also reduce the impact of a new development on air quality and secure air quality improvements where necessary.</p> <p>This will benefit all residents in the borough, including both men and women.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Noise</u></p> <p>The guidance in the SPD will help minimise exposure to high levels of noise in new developments. This includes operational noise, as well as noise from construction.</p> <p>This will benefit all residents in the borough, including both men and women.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Urban greening</u></p> <p>The guidance in the SPD will help promote urban greening as part of new development. This may include significant new landscaping or small green spaces.</p> <p>This will benefit all residents in the borough, including both men and women.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Road safety</u></p> <p>The guidance in the SPD will help new developments create safer streets, promote active travel and reduce the reliance on cars.</p> <p>This will benefit all residents in the borough, including both men and women. It may also</p>	<p>This could be of socio-economic benefit to men living in deprived areas.</p> <p>This is because in addition to sex, living in a deprived area is a</p>

<p>have a particular benefit for men as this group is significantly more likely to be involved in a road traffic accident than women.</p>	<p>known risk factor for road traffic accidents.</p>
<p><u>Safe streets</u></p> <p>The SPD provides guidance on creating safer streets. This involves measures such as lighting, passive surveillance and high levels of street activity.</p> <p>This will benefit all residents in the borough, including both men and women. It may also be of particular benefit to women who are particularly vulnerable to violence in public spaces.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>The 201 Census found that 51.6% of Southwark's residents are women and 48.4% are men. (Source: <a href="#">Sex - Census Maps, ONS</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Road safety</u></p> <p>The WHO reports that worldwide, males are typically three times more likely to be killed in road crashes than females. (Source: <a href="#">Road traffic injuries - World Health Organisation</a>). In London, more men are injured in road accidents than women. (Source: <a href="#">Inequalities in road danger in London 2017-2021 (tfl.gov.uk)</a>).</p>	<p>GLA data shows that the difference in injury rates between men and women increases when deprivation is considered. Young men (aged 16-30) living in the most deprived 30 per cent of London, riding motorcycles have the highest killed or seriously injured rate (0.54 killed or seriously injured per 1,000 people). (Source: <a href="#">Inequalities in road danger in London 2017-2021 (tfl.gov.uk)</a>).</p>
<p><u>Safe streets</u></p> <p>According to Plan International UK, 66% of girls in the UK have experienced sexual attention or sexual or physical contact in a public place. (Source: <a href="#">It's not OK   Plan International UK (plan-uk.org)</a>).</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>71% of women of all ages in the UK have experienced some form of sexual harassment in a public space. This number rises to 86% among 18-24-year-olds. (Source: <a href="#">Prevalence and reporting of sexual harassment in UK public spaces March 2021 - A report by the APPG for UN Women</a>).</p>	
<b>Mitigating and/or improvement actions to be taken</b>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise.</p>

<b>Sexual orientation</b> - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
<b>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</b>	<b>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</b>
<p><u>Climate change</u></p> <p>The SPD encourages applicants to be more ambitious in addressing climate change in their planning applications by providing sustainability standards and best practice examples. This includes guidance for new-build development as well as retrofitting.</p> <p>This will help applicants better understand climate mitigation and adaptation actions and will help deliver net zero development in Southwark. It will also improve the standard of development in the borough and provide higher quality homes.</p> <p>This will benefit all residents in the borough, including all sexual orientations.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Energy efficiency</u></p> <p>The SPD sets out the high standard of insulation and energy efficiency expected of development. A high standard of insulation and energy efficiency will help residents keep their homes warm in colder months.</p> <p>This will benefit all residents in the borough, including all sexual orientations.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Overheating</u></p> <p>The SPD provides guidance on managing the risk of overheating. This will help developments to be less susceptible to overheating and deliver a more liveable, comfortable standard of living.</p> <p>This will benefit all residents in the borough, including all sexual orientations.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p><u>Flood risk and resilience</u></p> <p>The guidance in the SPD will help ensure new development takes place in areas at low risk of flooding as far as possible. It will also help ensure that new development achieves a high level of flood resilience.</p> <p>This will benefit all residents in the borough, including all sexual orientations.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Air quality</u></p> <p>The SPD sets out how to prevent and mitigate exposure to poor air quality. This will help to improve the air quality surrounding new developments. It will also reduce the impact of a new development on air quality and secure air quality improvements where necessary.</p> <p>This will benefit all residents in the borough, including all sexual orientations.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Noise</u></p> <p>The guidance in the SPD will help minimise exposure to high levels of noise in new developments. This includes operational noise, as well as noise from construction.</p> <p>This will benefit all residents in the borough, including all sexual orientations</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Urban greening</u></p> <p>The guidance in the SPD will help promote urban greening as part of new development. This may include significant new landscaping or small green spaces.</p> <p>This will benefit all residents in the borough, including all sexual orientations.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><u>Road safety</u></p> <p>The guidance in the SPD will help new developments create safer streets, promote active travel and reduce the reliance on cars.</p>	<p>No positive or negative socio-economic impact applicable.</p>

<p>This will benefit all residents in the borough, including all sexual orientations.</p>	
<p><u>Safe streets</u></p> <p>The SPD provides guidance on creating safer streets. This involves measures such as lighting, passive surveillance and high levels of street activity.</p> <p>This will benefit all residents in the borough, including all sexual orientations. It may also be of particular benefit to LGBT residents who are particularly vulnerable to violence in public spaces.</p>	<p>No positive or negative socio-economic impact applicable.</p>
<p><b>Equality information on which above analysis is based</b></p>	<p><b>Socio-economic data on which above analysis is based</b></p>
<p><u>General data</u></p> <p>In the latest census 8.08% of Southwark's residents identified as LGB+. This is the fourth highest figure of any local authority district in England and Wales. The areas with the highest proportion of LGB+ residents are in the north-west of the borough. (Source: <a href="#">Sexual orientation - Census Maps, ONS</a>).</p>	
<p><u>Safe streets</u></p> <p>According to research by Yougov, over a third of LGBT people say they don't feel comfortable walking down the street holding their partner's hand. This rises to three in five for gay men. One in five LGBT people have experienced a hate crime or incident due to their sexual orientation and/or gender identity in the last 12 months. (Source: <a href="#">LGBT in Britain: Hate Crime and Discrimination - Stonewall</a>).</p>	
<p><b>Mitigating and/or improvement actions to be taken</b></p>	
<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise</p>	<p>As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on this group. The Council will mitigate against any unforeseen issues that arise</p>

### **Human Rights**

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol.

### **Potential impacts (positive and negative) of proposed policy/ decision/ business plan**

The SPD provides guidance on how to apply the relevant policies of the Southwark Plan 2022. It does not create any new policy. The SPD will encourage applicants to be more ambitious in their planning applications to address climate change and environmental factors. This includes improving energy efficiency, managing overheating, increasing flood resistance and resilience, improving air quality, minimising disruption from noise, urban greening, road safety and safe and accessible streets.

This protects local identity and improves public realm considerate of the Human Rights Act.

### **Information on which above analysis is based**

All data illustrated in Southwark Plan Integrated Impact Assessment (February 2022) for Strategic Policy 2 Southwark Together, Strategic Policy 5 Thriving neighbourhoods and tackling health inequalities and Strategic policy 6 Climate Emergency.

The SPD provides guidance and contributes to IIAO3 'To improve the health of the population', IIAO5 'To promote social inclusion, equality, diversity and community cohesion', IIAO6 'To reduce contributions to climate change', IIAO7 'To improve the air quality', IIAO7 'To improve the air quality', IIAO8 'To avoid waste and maximise, reuse or recycle waste arising as a resource', IIAO9 'To encourage sustainable use of water resources', IIAO11 'To protect and enhance quality of landscape and townscape', IIAO13 'To protect and enhance open spaces, green corridors and biodiversity', IIAO14 'To reduce vulnerability to flooding', IIAO15 'To provide everyone with the opportunity to live in a decent home', IIAO16 'To promote sustainable transport and minimise the need to travel by car'.

### **Mitigating and/or improvement actions to be taken**

As there are no negative impacts, no mitigating actions are required. The Council will continue to monitor impacts on human rights. The Council will mitigate against any unforeseen issues that arise.



## **Conclusions**

Overall, the SPD will have no negative impacts on the equalities of residents in Southwark. There are many benefits of the SPD for all residents in the borough, including all protected characteristics. Certain guidance will benefit some groups more than others as some residents will be able to make more use of the SPD than others.

The SPD encourages applicants to be more ambitious in addressing climate change in their planning applications by providing sustainability standards and best practice examples. This will help applicants better understand climate mitigation and adaptation actions and will help deliver net zero development in Southwark. This will benefit all residents of the borough, including all protected characteristics.

The SPD sets out guidance on improving energy efficiency, managing overheating, increasing flood resistance and resilience, improving air quality, minimising disruption from noise, urban greening, road safety and safe and accessible streets. These positive impacts will benefit all residents of the borough, including all protected characteristics.

The guidance on improving energy efficiency, managing overheating and improving air quality will have a particular positive impact and socio-economic benefit for many groups. The guidance on making safe and accessible streets will have a particular benefit for those residents who are disabled, mobility impaired or more vulnerable to violence in public spaces.

Those who speak English as a second language may find it challenging to understand the guidance provided in the SPD. This means the guidance in the SPD could be less of a benefit to those residents who speak English as a second language. Mitigation measures to address this concern have been set out in section 5.

The Council will continue to monitor impacts on all protected characteristics and will mitigate against any unforeseen issues that arise.

**Section 5: Further equality actions and objectives**

<b>Further actions</b>			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
<b>No.</b>	<b>Description of issue</b>	<b>Action</b>	<b>Timeframe</b>
1	Ensure that the Climate and Environment SPD is adopted within the shortest timeframe possible by the Council so that the benefits identified can be secured.	Progress the Climate and Environment SPD towards public consultation and then formal adoption at Cabinet.	Public consultation proposed to be agreed at Cabinet on 22 <sup>nd</sup> July 2024.
2	Ensure that the implementation of the Climate and Environment SPD is monitored following adoption for potential actual effects on different groups.	The outcomes of implementing the guidance in the SPD will be monitored through the Authority Monitoring Report (AMR). Equality analysis is an ongoing process and that does not end once the SPD is implemented.	Monitoring will be undertaken annually.
3	Ensure that there is no language barrier preventing residents from accessing the SPD.	Upon request the Council can translate the documents into other languages.	Upon request.



# **Strategic Environmental Assessment (SEA)**

**Climate and Environment Supplementary  
Planning Document (SPD)**

## 1. Introduction

This is a Strategic Environmental Assessment screening document for Climate and Environment Supplementary Planning Document. It determines that a Strategic Environmental Assessment is not required in this case for the reasons outlined in the remainder of this report.

## 2. Legislative Background

A Strategic Environmental Assessment (SEA) is a way of ensuring the environmental implications of a plan or programme for 'town or country planning or 'land use' are taken into account. The need for environmental assessments is set out in the EU Directive 2001/42/EC (hereafter referred to as the SEA Directive). This has subsequently been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (hereafter referred to as the SEA Regulations).

The Government's Planning Practice Guidance (PPG) published in September 2023 states that in some limited circumstances, where a Supplementary Planning Document (SPD) could have significant environmental effects, it may fall within the scope of the SEA Regulations and would require an SEA. To determine whether the Climate and Environment SPD could have significant environmental effects, its potential scope has been assessed against the criteria set out in [1 to the SEA Regulations](#)<sup>[OBJ]</sup> noted in the PPG, an SEA is unlikely to be required where an SPD deals only with a small area at a local level (see regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004). However, an SEA is required if there are likely to be significant environmental effects<sup>[OBJ]</sup>.

## 3. Screening Process

The screening opinion assessment is undertaken in two parts: the first part will assess whether the SPD requires SEA (as per the flow chart shown in Figure 1); and the second part of the assessment will consider whether the SPD is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the SEA Directive and the SEA Regulations.

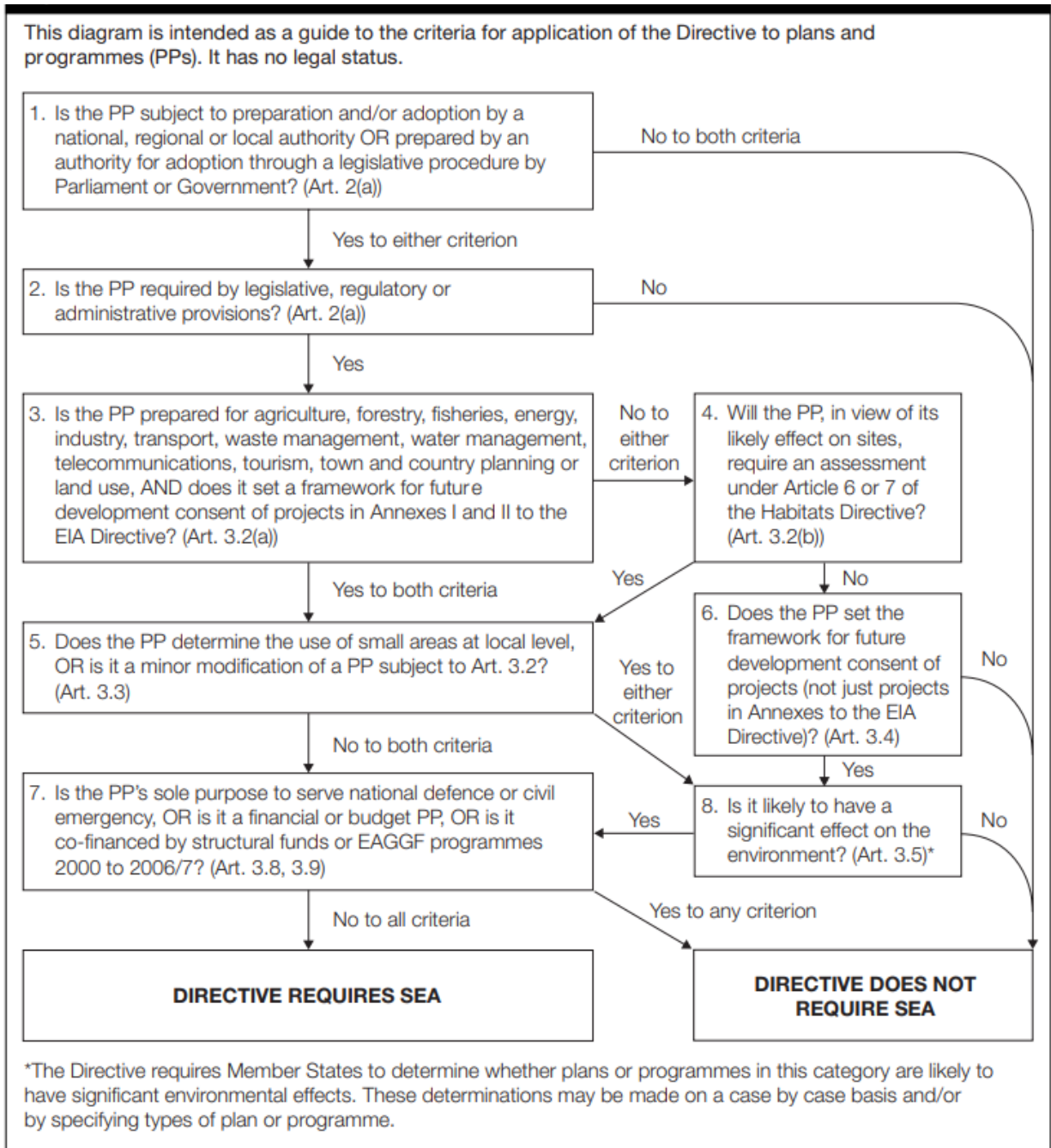


Figure 1: Application of the SEA Directive to plans and programme

#### 4. Summary of the SPD

<b>Details of SPD</b>	
<b>Name of SPD</b>	Climate and Environment Supplementary Planning Document (SPD)
<b>Geographic Coverage</b>	The entire borough
<b>Purpose</b>	<p>To provide guidance to support Southwark Plan policy SP6. It does not contain new policy. The SPD is a material consideration with significant weight in the determination of a planning application.</p> <p>It aims to help people understand climate mitigation and adaptation actions and provides advice on how to make successful planning applications that are in line with the Council's Climate policies.</p>
<b>Summary of content</b>	<p>This SPD covers a broad range of technical guidance, applicable to the whole borough. Guidance is grouped into thematic chapters;</p> <ul style="list-style-type: none"> <li>• Energy and carbon reduction</li> <li>• Minimising flood risk and water efficiency</li> <li>• Environmental protection and improving air quality</li> <li>• Green Infrastructure, biodiversity and trees</li> <li>• Movement and transport</li> <li>• Avoiding waste and minimising landfill</li> </ul>

## 5. Assessment 1: Screening Assessment Establishing the Need for SEA Stage

Stage	Y/N	Reason
1. Is the SPD subject to preparation and/or adoption by a national, regional or local authority, OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	Yes.  The SPD will be prepared and adopted by Southwark Council in its role as Local Planning Authority, which is allowed under the Town and Country Planning Act 1990.
2. Is the SPD required by legislative, regulatory or administrative provisions? (Art. 2(a))	N	No.  The preparation of this SPD is not a requirement of legislation, regulatory or administrative provisions.
3. Is the SPD prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art. 3.2(a))	Y	Yes.  The SPD provides further guidance to the adopted Southwark Plan 2022 which is the land-use planning policy framework for its area. This has been subject to full Sustainability Appraisal (including SEA) as part of the preparation of the Southwark Plan. The SPD will not create new policy or land-use designations.
4. Will the SPD, in view of its likely effect on site, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))	N	No.  The HRA of the Southwark Plan 2022 has been undertaken alongside the IIA, with the findings of the HRA informing the IIA. The methods and findings of the HRA process are reported separately from the IIA and the report has been approved by the statutory consultee (Natural England)

		<p>and placed online to be accessed by the wider public.</p> <p>The HRA screening process has found that the policies and site allocations to be adopted under the Southwark Plan 2022 will have no negative impact on the four European Sites that are located within a 10km boundary of Southwark, either alone or when considered in combination with other existing plans and projects. In light of this finding, it is not required to carry out any further HRA analysis.</p> <p>The SPD will not change or add to policy, proposals or designations within the Local Plan, therefore it is not considered that further screening for such assessment is necessary as there would be no significant effects on European Sites.</p>
<p>5. Does the SPD determine the use of small areas at local level OR is it a minor modification of a plan or programme subject to Art. 3.2? (Art. 3.3)</p>	<p>N</p>	<p>No.</p> <p>There are no additional policies, proposals or allocations contained within the SPD which have not already been set within the Local Plan. There will be no aspect of the SPD which would modify the emerging Local Plan, just support it.</p>
<p>6. Does the SPD set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art. 3.4)</p>	<p>N</p>	<p>No.</p> <p>This framework is already set within the Local Plan. The SPD will provide further guidance on the relevant policies, proposals or allocations within the Local Plan.</p>



<p>7. Is the SPD's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan or programme, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art. 3.8, 3.9)</p>	<p>N/A</p>	<p>Not applicable.</p>
<p>8. Is it likely to have a significant effect on the environment? (Art 3.5)</p>	<p>N</p>	<p>No.</p> <p>It is not likely that the SPD will have any significant effect that has not already been identified and assessed through the Sustainability Appraisal (including SEA) of the adopted Southwark Plan.</p> <p>It will provide guidance on the existing policy within the Southwark Plan.</p>

## 6. Assessment 2: Likely Significant Effects on the Environment

SEA Directive criteria and Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004	Southwark Council assessment	Likely significant environmental effect?
The characteristics of plans and programmes, having regard, in particular, to-		
1. The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	<p>The SPD will provide further guidance on the policies, proposals and the relevant site allocations that are contained within the Local Plan.</p> <p>The Local Plan as a whole, including those parts relating to the area and the topics covered in this SPD, have been fully assessed for the purposes of Sustainability Appraisal and the Strategic Environmental Assessment, with no additional environmental impact for consideration</p>	<b>None</b>
2. The degree to which the plan or programme influences other plans and programmes, including those in a hierarchy	The SPD, in providing further guidance on the framework set within the Local Plan, does not directly affect other specific public sector plans or programmes but rather is influenced by the Local Plan and other higher tier planning policy including the London Plan, which has also been subject to a SA/SEA and examined against the National Planning Policy Framework.	<b>None</b>

3. The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development;	<p>The Local Plan sets the context for achieving sustainable development, for which the SPD will provide further guidance regarding how this should be achieved.</p> <p>The guidance in the SPD is being used to promote sustainable development and environmental considerations.</p>	<b>Yes</b>
4. Environmental problems relevant to the plan or programme; and	<p>Environmental problems have already been considered in the Sustainability Appraisal associated with the Local Plan, which the guidance in this document supplements.</p> <p>No additional issues should arise, as the SPD does not create policies or site allocations.</p>	<b>None</b>
5. The relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The SPD is not directly relevant to the implementation of any National or European legislation on the environment, such as the Water Framework Directive.	<b>None</b>

**Characteristics of the effects and of the area likely to be affected, having particular regard to:**

The probability, duration, frequency and reversibility of the effects;	This SPD seeks to ensure that development across the Local Plan period makes appropriate contributions to the supporting infrastructure required to sustain the projected level of development.	<b>None</b>
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	It is not anticipated the SPD will result in significant long-term adverse effects, and any social and environmental impacts are likely to be positive.	
The cumulative nature of the effects;	The SPD is in general conformity with the strategic policies, the implementation of which it seeks to support across the Borough. It is not considered that there will be any negative cumulative effects on the Borough overall.	<b>None</b>
The transboundary nature of the effects;	The HRA screening process found that the policies and site allocations to be adopted under the Southwark Plan 2022 will have no negative impact on the four European Sites that are located within a 10km boundary of Southwark, either alone or when considered in combination with other existing plans and projects. In light of this finding, it is not required to carry out any further HRA analysis.	<b>None</b>
The risks to human health or the environment (for example, due to accidents);	The SA and SEA conducted for the Local Plan did not identify any potential negative impacts upon human health and the environment.	<b>None</b>
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	This is not an area-specific policy, but supplementary planning guidance which will apply to development across the borough. As such, it should not in itself directly result in any spatial impacts of any notable magnitude.  The geographical area of the borough has been subject to an SA /	<b>None</b>

	SEA through the development of the Local Plan.	
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<b>The value and vulnerability of the area likely to be affected due to—</b>		
(i) special natural characteristics or cultural heritage;	Applications for development within the borough will be assessed against relevant development policy in relation to sites of importance for cultural heritage. Southwark Council's designated heritage assets are covered by separate Local Plan and legislation. The SPD seeks a positive approach to seeking to maintain or improve the setting of these assets. No significant effects have therefore been identified.	<b>None</b>
(ii) exceeded environmental quality standards or limit values; or	The SPD seeks to support development in keeping with the principles outlined in national, London Plan and Local Plan policy guidance and the policies in the Local Plan have already been subject to SA/SEA to ensure development is sustainable.	<b>None</b>
(iii) intensive land-use.		<b>None</b>
<b>Assessment 2 conclusion:</b>	The Draft Climate and Environment SPD <b>is not likely to have a significant detrimental impact</b> upon the environment.	

## **7. Conclusion: Summary of Screening Opinion**

As a result of the Screening Assessment, it is concluded that Climate and Environment Supplementary Planning Document (SPD) is not likely to have significant environmental effects.

The Climate and Environment SPD conforms with the adopted Southwark Plan 2022 and corresponding Site Specific Allocations. The SPD provides guidance on these policies but does not create new policy. The policies and allocations therein have been subject to Strategic Environmental Assessment in their own right through the Southwark Plan 2022 Integrated Impact Assessment.

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