

Environment Scrutiny Commission

Tuesday 15 March 2022

7.00 pm

Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

Membership

Jon Bootland
Councillor Margy Newens (Chair)
Councillor Adele Morris (Vice-Chair)
Councillor James Coldwell
Councillor Tom Flynn
Councillor Graham Neale
Councillor Leo Pollak
Councillor Leanne Werner

Reserves

Councillor Peter Babudu
Councillor Maggie Browning
Councillor Jack Buck
Councillor Richard Leeming
Councillor Victoria Mills
Councillor Damian O'Brien
Councillor Dan Whitehead

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Contact

Julie Timbrell on 020 7525 0514 or email: julie.timbrell@southwark.gov.uk

Members of the committee are summoned to attend this meeting

Eleanor Kelly

Chief Executive

Date: 7 March 2022



Environment Scrutiny Commission

Tuesday 15 March 2022

7.00 pm

Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

Order of Business

Item No.	Title	Page No.
PART A - OPEN BUSINESS		
1.	APOLOGIES	
	To receive any apologies for absence.	
2.	NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT	
	In special circumstances, an item of business may be added to the agenda within five clear working days of the meeting.	
3.	DISCLOSURE OF INTERESTS AND DISPENSATION	
	Members to declare any interests and dispensations in respect of any item of business to be considered at this meeting.	
4.	MINUTES	1 - 7
	To approve as a correct record the Minutes of the meetings held on 29 November 2021, enclosed, and 8 February 2022, to follow.	
5.	AIR QUALITY SCRUTINY REVIEW UPDATE	8 - 13
	Officers have prepared a briefing note, enclosed, on progress with responding to Recommendation 8 of the second Air quality scrutiny review report, which integrated outstanding recommendations from the first Air Quality scrutiny review report.	
	Councillor Catherine Rose, Cabinet Member for Transport, Parks and Sport, will attend to discuss this with the commission.	

Item No.	Title	Page No.
6.	PLANNING BRIEFING: UPDATE ON URBAN GREENING FACTOR AND EARLY REVIEW OF THE SOUTHWARK PLAN	14 - 21

This item will take an update on :

- Implementing the Urban Greening Factor – with reference to work indicated in the Climate Emergency strategy
- Early Review of the Southwark Plan consideration of our energy and sustainability policies, to meet the Climate Emergency, as set out in the Environment and Planning scrutiny review cabinet response.

An officer report is attached.

Juliet Seymour, Planning Policy Manager, will present.

7. ENERGY SCRUTINY REVIEW

A draft report is to follow.

DISCUSSION OF ANY OTHER OPEN ITEM AS NOTIFIED AT THE START OF THE MEETING.

PART B - CLOSED BUSINESS

DISCUSSION OF ANY CLOSED ITEMS AS NOTIFIED AT THE START OF THE MEETING AND ACCEPTED BY THE CHAIR AS URGENT.

DISTRIBUTION LIST 2021/22

Date: 7 March 2022

EXCLUSION OF PRESS AND PUBLIC

The following motion should be moved, seconded and approved if the sub-committee wishes to exclude the press and public to deal with reports revealing exempt information:

“That the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 1-7, Access to Information Procedure rules of the Constitution.”



ENVIRONMENT SCRUTINY COMMISSION

Summary MINUTES of the Environment Scrutiny Commission held on Monday 29 November 2021 at 7.00 pm at Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH.

PRESENT: Councillor Margy Newens (Chair)
Councillor Adele Morris (Vice-Chair)
Councillor James Coldwell
Councillor Leo Pollak
Councillor Leanne Werner

OTHER MEMBERS PRESENT: Councillor Helen Dennis, Cabinet Member for the Climate Emergency and Sustainable Development

OFFICER SUPPORT: Stuart Davies, Director of New Homes
Colin Wilson, Head of Regeneration , Old Kent Road
Juliet Seymour, Planning Policy Manager
Julie Timbrell, Scrutiny Project Manager

1. APOLOGIES

There were no apologies.

2. NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT

There were no urgent items.

3. DISCLOSURE OF INTERESTS AND DISPENSATION

Councillor Margy Newens recorded that she is a shareholder investor in a Community Energy project initiated by SE24. She clarified that following a brief discussion at the last meeting she had received assurances from officers that this is not a pecuniary interest.

4. MINUTES

The minutes of the meeting held on 14 October 2021 were agreed as an accurate record, with one amendment, which was to correct the reference to the name of Dulwich College.

5. ENERGY REVIEW: OFFICER REPORT

The following provided presentations:

- Stuart Davies, Director of New Homes, Housing and Modernisation – see 'NEW HOMES net zero carbon commitment'
- Colin Wilson, Head of Regeneration , Old Kent Road, - see Old Kent Road presentation
- Juliet Seymour, Planning Policy Manager – see Planning Officer presentation

6. ENERGY REVIEW: ROUNDTABLE

The chair introduced the item by explaining that aim of the session is to lay down some pointers towards some of the changes required to meet the council's sustainable development and retrofitting objectives, and increase renewable energy production.

The chair then invited the following to provide a presentation:

- Greater London Authority: Catherine Barber, Assistant Director, Environment and Energy – see GLA energy presentation.
- Architect Climate Action Network; James Rixon and Sara Edmonds, Architects with a background in retrofit - see ACAN retrofit explainer presentation.

The following were invited to contribute to the roundtable:

- Passivhaus Trust, Jon Bootland, CEO, Passivhaus Trust
- British Land, Roger Madelin CBE Joint Head of Canada Water at British Land PLC
- Peabody, Richard Ellis, Director of Sustainability
- Berkeley, Andrew Maunder, Development Manager, Chloe Young, Head of Development, Berkeley Homes NEL and Victoria

Chater-Lea, sustainability advisor.

- Native Land, Felicity Masefield , Development Executive, responsible for formulating the Native Land Sustainability Strategy
- Fabrix, Matthew Weaver, Corporate Investment Manager
- Dulwich Estate, Simone Crofton, Chief Executive
- G320 Smaller Housing Associations of London, Mark Jackson, Chief Executive of Lambeth and Southwark Housing Association
- Lend Lease, Ian Smith, Senior Public Affairs Manager.

Wilmott Dixon, Richard Bartlett, sent apologies due to transport problems.

The chair invited questions and contributions .

A member asked about concerns around fire safety and the use of timber in construction. ACAN agreed there had been an overreaction to a complex issue, and drew the commission's attention to the website <https://www.architectscan.org/safe-timber>. The member said this campaign was supported by the council, and there are some interesting timber New Home projects coming through.

ACAN were asked about measuring embodied carbon. They said there are a range of tools to do this. ACAN are campaigning for embodied carbon to be regulated. LETI has an Embodied Carbon Primer aimed at Local Authorities.

A member commented that Southwark has taken in a lead doing roof retrofit and adding new houses, with the largest programme across Europe, but there has been no funding available through the GLA to add to this supply. Catherine Barber , from the GLA, said she will take that away to consider.

Members invited developers to showcase exemplar projects. Lend Lease spoke about the net zero development at Elephant Park and a 15 unit Passivhaus scheme.

Roger Madelin, British Land, spoke about Canada Water, which is low carbon, both emitted and embodied. He said that British Land's insurance broker would not cover timber, and there is some question about the embedded carbon of cross laminated timber. Instead a new form of earth friendly cement is being used in some buildings. Canada Water uses Local Heat Networks, which recycle heat from offices and residential blocks. Canada Water will not use gas, with the exception of the swimming pool, and this can be removed in the future. Roger Madelin reflected that while several years ago developments such as Kings Cross , which uses Combined Heat and Power (CHP) and green gas, were considered

at the leading edge of sustainable development, nowadays Canada Water will use local energy networks, which is probably more appropriate than CHP for new development given the available technology. This does mean that there are no gas boilers or cookers, which can elicit a kick back from residents, but new induction electric cookers are very high performing.

Several developers outlined their organisational targets for achieving net zero and how they are seeking to measure and reduce embodied carbon in construction, and scope 1, 2 and 3 emissions. Scope 1, 2 and 3 emissions include those caused by the building, supply chain and building use over time. Many are using renewable and hydro fuel in the construction phase. Scope 3 are more challenging and while they do not have all the answers they are working on supply chains and opportunities to use timber on some buildings, regulations permitting.

Jon Bootland, from the Passivhaus Trust, spoke about a number of schemes coming online in London and across the UK. There are now 1500 buildings around the country using 90% less energy. He spoke about the associated costs and incentives. Presently public authorities and social housing providers tend to be the main clients. The Scottish School Trust incentivises Passivhaus. With every iteration of Passivhaus schools the construction costs have reduced, depending on size, with improvements in learning and the supply chain. The first generation of schools tends to be 15% higher to construct, the second generation 10-12% higher and the third generation are expected to have an 8 - 4% uplift in costs.

Developers flagged up there is a general uplift in material costs of between 10-20%.

Lend Lease and other developers said there is tentative evidence of the private sector demanding Passivhaus buildings with rising awareness of the ecological emergency and energy price hikes, and if the market starts to demand Passivhaus this would significantly increase supply. A Passivhaus building will be worth more on the social housing green book, allowing more lending.

Sharing good practice in construction was discussed with several developers indicating that they already work in partnership and there was a readiness by some to open their books up to share costs and expertise in delivering low carbon.

A member commented that the planning committee has got better at challenging developers on affordable housing, so that developers now know if they meet or even exceed targets for affordable housing then permission is much more likely to be given, and this is in part because of constituents keeping raising the housing crisis with

councillors . He suggested that if members feel similarly emboldened to challenge laggard developers, none of whom are here today, then the planning committee may see a similar increase in performance on environmental standards.

Members discussed the sources of government funding available to retrofit social housing and council engagement. The GLA is running several programmes to support the retrofit of Social Housing, including the Retrofit Accelerator for the whole of the UK, funded by The Department for Business, Energy and Industrial Strategy (BEIS), delivered by Turner and Townsend, to enable council and housing providers to access the Social Housing Decarbonisation Fund. There is a related Innovation Fund, which is open to London Boroughs, however Southwark has not yet applied to be part of this.

Officer capacity to engage and the cost benefit analysis for applying for funds was discussed as an issue during the roundtable. The GLA representative, Catherine Barber, Assistant Director, Environment and Energy, made the case that participation in programmes can pave the way for the government funds that can potentially offer millions of pounds to the council and social housing retrofitting programmes.

Officers said that the council has successfully bid for Mayor of London and national funds for District Heat Networks.

There was a discussion on funding and if complexity and the changing nature of funding streams can be overwhelming, bitty, and difficult to monitor.

The G320 representative for small housing Registered Providers told the commission that they are only just getting to grips with the climate and ecological emergency and the concept of retrofitting. The scale of the financial challenge, funding gap, knowledge gap, and overcoming the bureaucratic hurdles to access funding are considerable. A typical scheme is 10 houses. Heritage requirements in conservations areas can be an obstacle.

They were advised that The Mayor of London's Social Housing Retrofit Accelerator, funded by BEIS, and is well placed to help as this programme will offer technical advice and support to social housing providers to help them bid in to government's Social Housing Decarbonisation Fund. Many small providers are often not aware of this.

Peabody, a much larger housing provider, is further on in the journey with several retrofit projects in place. They have employed a funding broker to help access funding, given the complexity.

A significant challenge for Peabody has been to engage tenants with retrofit as around 40% have refused, partly because of the disruption. They are now embarking on a co-creation approach with tenants as they want all tenants to benefit and to ideally even ask Peabody to go further.

ACAN advised there are resources available to help engage tenants in the journey including research by the Carbon Coop. They emphasised the importance of reducing demand and a 'Fabric First' approach. Air source pumps are not a silver bullet. They recommended engaging a liaison person as people need hand holding. Plymouth is a place where retrofit went well [more information here: <https://energy-cities.eu/plymouth-citizen-led-approaches-to-municipal-retrofit/>] Retrofit can deliver significant social value and engaging tenants in the outcome is important.

Jon Bootland, from the Passivhaus Trust said there are bi-annual open days for tenants to visit Passivhaus retrofit projects, so tenants can experience the comfort that can be achieved.

Architects involved in delivering retrofit, the Passivhaus Trust and the New Homes team all flagged up the importance of factoring in education, as using a retrofit or new build highly insulated house is different to a traditional home.

The cabinet member asked if it was possible to retrofit Tower Blocks and Jon Bootland, from Passivhaus Trust said it absolutely can be done and many buildings can reach Passivhaus EnerPHit standards, which is slightly relaxed standard, particularly blocks, whether horizontal or vertical.

There are other building types, such as Victorian residential street properties, and other older buildings, that because of the architecture and heritage cannot be completely retrofitted, although it is possible to make significant energy savings. He said that he did not think that Passivhaus ought to apply to all heritage buildings.

The commission heard from Fabrix, who have a specialism in retrofit of heritage buildings and repurposing offices. They pointed out that the embodied carbon of a building is huge, and even though a retrofit of an existing building may result in a lower EPC than a new build, a good retrofit can significantly reduce energy and extend the life of a building, and embodied carbon, by 40- 50 years, alongside preserving the cultural value. Around 70% of a building's lifetime carbon is contained in the fabric of the building.

The chair and commission members thanked the roundtable participants.

7. PLANNING AND ENVIRONMENT SCRUTINY REVIEW - CABINET RESPONSE

This was noted.

8. ENERGY REVIEW: SCOPE

This was noted.

9. WORK PROGRAMME

This was noted.

Environment Scrutiny

Briefing for 15 March meeting

DRAFT

Environment Scrutiny, Air Quality

The Environment Scrutiny Commission would like Cllr Catherine Rose and officers to discuss and provide a briefing on outstanding Air Quality recommendations. At their meeting on 15 March, 7pm.

The commission would like an update on the cabinet's recent undertaking to OSC that the relevant Cabinet Member will work with officers to fully assess the feasibility of including vehicle size in resident parking charging.

Background

In April 2021, the Environment Commission agreed their report 'Air quality scrutiny review report - part two' which was subsequently presented to cabinet on 14 September 2021 with a further update provided to cabinet on 7 December 2022.

The 'Air quality scrutiny review report - part two' focused on three areas; the effective implementation of Low Traffic Neighbourhoods (LTN), additional council and TfL measures to reduce and mitigate transport emissions in Southwark and making recommendations to the council and relevant partners in order to reduce other sources of air pollution not covered in depth by the previous scrutiny review on Air Quality in 2019/20.

The Environment Commission have requested a further update on recommendation 8 as well as emerging environmental based parking policies for the upcoming meeting on 15 March 2022.

Air quality scrutiny review report – recommendation

Recommendation 8 is comprised of six points detailed below supported by an officer response.

- 1. Develop an operational plan with partners to implement the Movement Plan, focusing on structural changes, informed by the ambitions of the Movement Plan and its associated deprivation data.**

On 1 February 2022 Cabinet considered the Movement Plan, its monitoring report and future review. The monitoring report identifies the progress that has been made, recognises the challenges and changing context as well as possible reasons to explain the data that has been observed. The report highlights the work undertaken to develop the Movement Plan Equity Framework and details how this has been used in the past two years, as well as ongoing work.

The report also set out the context for the Movement Plan including the COVID -19 pandemic, Southwark Conversation into the impact of the pandemic, the councils Southwark Stands Together commitment, lessons from the women's and girls safety listening exercise, Climate emergency declaration, Air Quality Strategy 2022 update and lessons learnt from streetspace schemes and how the council brings forward and delivered traffic schemes and lastly the continuing funding challenges.

The Movement Plan review and the resulting revised document will be consulted on in the summer of 2022. This revised Movement Plan will be brought to cabinet to agree its consultation which will include how we will engage with partners.

- 2. Viability testing of the target to reduce traffic by 90% by 2030.**

The council currently has a target (as contained in within the Streetspace Plan) of a 50% reduction of pre-pandemic levels. As part of the review of the Movement Plan targets will be reviewed considering applicability (all traffic, local traffic), deliverability, and ability to monitor and ensure delivering of the ambition, coordination with other work areas. This will particularly include the Air Quality Strategy which is being reviewed on a similar timescales.

- 3. End the current diesel contract for Southwark fleet vehicles and switch to EV as soon as possible. Swap EV for sustainable transport / freight. Revisit our procurement strategy to ensure subcontractors have EV or a sustainable fleet. Set a cut-off date for compliance so that subcontractors have time to make the switch.)**

The Councils current commercial fleet consists of c.330 vehicles. For the majority of these vehicles there is both an internal combustion engine and an electric alternative.

The electric vehicle alternative for the cars and light commercials is no longer considered innovative technology. The electric vehicle options for the heavier and specialist vehicles is not as well advanced. There are some vehicle categories where no appropriate electric alternative currently exists e.g. gulley sucker. There are other vehicle categories where the electric vehicle alternative does exist but is very much in its infancy e.g. compact sweepers.

Fleet Services are currently working to develop a Fleet Replacement Strategy. This work will include the development of a robust vehicle selection process and criteria to establish the needed commercial fleet.

As part of the preparation we have commissioned a detailed analysis of fleet possibilities and option appraisals including but not limited to; fuel source, cost, finance options for replacement, possible programme, and indicative options for delivery models.

Whilst it is certainly feasible to acquire electric vehicles for many of the fleet replacement requirements, detailed consideration needs to be given to the required charging infrastructure, its location and the expected associated costs. The scale of the requirement and the task of installing charging infrastructure on such a large scale should not be under-estimated.

4. Southwark adopts a maximum charge for bike hubs/hangers that ensures that is cheaper than car parking by space.

The provision of cycle hangars has continued at pace throughout the last two years with the number of hangars effectively doubling to over 500 by end of March 2022. This is in response to the growing waiting list for hangar spaces which currently stands at nearly 9,000. The accelerated provision of hangars will continue into 2022/23 and beyond, with the future procurement mechanism currently being reviewed.

There are no plans to increase the current hangar space charge to users (currently £40 per annum) or reduce the current level of council subsidy (currently £20 per annum). However, this may be required to be reviewed dependent on the costs to the council of future cycle hangar provision, maintenance and management.

5. An update on charging for parking in the borough including the development and implementation of the emissions based charging policy and if this will include reductions in car parking provision. The commission recommended that this policy looks at the parameters of vehicle size, fuel, and multiple vehicles per house.

An emissions based charging structure is in place through the implementation of the following pricing structure on both permits and pay and display:

- Permits – electric vehicles (£31.25), petrol vehicles and ULEZ compliant diesel (£130), Non- ULEZ diesel vehicles (£250)
- Pay by phone – 25% surcharge for non-ULEZ diesel vehicles

The current charging policy contributes to the delivery of objectives within the Movement Plan including managing kerb space and reducing traffic in the borough.

In terms of parking permit pricing criteria the council are limited by the vehicle information which is sold by the DVLA for our use. Officers have looked at the commercially available DVLA information regarding vehicles size and weight and these are not available for use, the current simple streamlined approach adopted concentrates on fuel and emissions because that is the information the DVLA provides commercially. There are other potentially more effective means of managing kerb space in relation to varying permit pricing which will be given consideration in the short to medium term

6. A borough-wide greenery programme to use native hedges to screen to against air pollution, ecological planting and also improve the environment and place making. Examples include allotments and wildlife sanctuaries. (Marked to be considered in the cabinet response to the first report) In addition, the commission would like to see a focus on more ecologically friendly maintenance of housing estates, including less mowing of grassy banks and verges. Green waste also ought to be converted to compost, see Earth Cycle.[1]

Southwark Council has undertaken new hedge and tree planting, relaxed mowing in Parks, Housing estates and road side verges and are working on an estate by estate basis to improve ecology and introduce more wildlife friendly management. The Ecology Service has worked with the community gardeners as part of the great estates programme to achieve this.

We have planted over 1,200 m of native hedge since 2021. Most in parks and some on housing estates such as Elmington. That is about 6,000 hedge plants.

Idverde composts parks green waste at the depots in our major parks.

The Southwark Nature Action Plan identifies numerous urban greening actions in the Habitat Action Plans.

This work is continuous and providing we can secure resources we can do much more.

This work is supported by the emerging Air Quality Action Plan includes a number of actions in line with this ambition as follows;

- Ensuring adequate, appropriate and well located green space and infrastructure is included in new and existing developments.
- Embed air quality in designs of estates

Further requests

An update on charging for parking in the borough including the development and implementation of the emissions based charging policy and if this will include reductions in car parking provision. The commission recommended that this policy looks at the parameters of vehicle size, fuel, and multiple vehicles per house.

Agenda Item 6

Item No.	Classification Open	Date: 15 th March 2022	Meeting Name: Environmental Scrutiny Committee
Report title:		Urban Greening Factor and Early Review of the Southwark Plan (2022)	
Ward(s) or groups affected:		All	
From:		Planning and Growth Division	

1. The Environmental Scrutiny Commission prepared eight recommendations in their 'Planning and Environment Review Report (July 2021)'. Officers prepared a response in December 2021 to this report including our plans to address their recommendations.
2. The Chair of the Environment Scrutiny Commission has requested further information on the Council's plan to progress the implementation of a local Urban Greening Factor (recommendation 8) through planning policy, and an update on the Early Review of the Southwark Plan in relation to energy and sustainability policies to meet the Climate Emergency.
3. In response, this report will cover the following areas:
 - An update on steps to prepare a local Urban Greening Factor for Southwark; and
 - An update on the Early Review of the Southwark Plan in terms of energy and sustainability policies

Urban Greening Factor

Policy Context

4. The Urban Greening Factor (UGF) is a regional planning tool that is used to evaluate the quality and quantity of urban greening on development sites that can produce positive impacts to biodiversity by introducing new habitat. It enables major developments to calculate and demonstrate how urban greening has been included as a fundamental element of site and building design by assigning a factor score to different surface cover types.
5. UGF is calculated by categorising different types of greening that can be incorporated into development by surface cover types, which broadly indicate their relative quality. The UGF assigns a factor score to each surface cover type, which are weighted based on their potential for rainwater infiltration. Scores range from 1 for semi natural vegetation through to 0 for impermeable sealed surfaces. The total score is calculated by adding up the different scores for the different surface cover types within a development.

London Plan Requirements

6. London Plan Policy G5 'Urban Greening', adopted in March 2021, requires local UGF target scores to be set out in Local Plans. Where Local Plans do not currently have local UGF scores, the London Plan UGF scores of 0.4 for predominately residential and 0.3 for predominately-commercial developments is applied to major development. UGF

target scores should be considered the minimum benchmark not the maximum required. The council currently applies the London Plan policy G5 in decision making.

7. The Mayor of London's 2021 [Urban Greening for Biodiversity Net Gain](#) design guide provides detailed guidance to applicants on how the requirements set out in policy can be achieved through good design. Guidance for councils on preparing local UGF targets is provided in the [draft London Plan Guidance Document on UGF](#) that will be used to inform our next steps.
8. The council provided a response to the GLA's consultation on its draft UGF guidance in December 2021. Our response in support of its principles and further suggestions can be accessed [here](#).

Southwark Plan (2022) Requirements

9. The Southwark Plan (2022) includes several policies, which establish our commitment to securing urban greening through new development. These policies include:
 - 9.1. *SP6 Climate Emergency* - improving our natural environment through the use of urban greening to reduce flood risk and improve air quality
 - 9.2. *P59 Green Infrastructure* - major development must provide green infrastructure with arrangements in place for long-term stewardship and maintenance funding.

Current Approach

10. Our current approach is to implement the adopted London Plan policy G5 as it is part of our adopted development plan. A review of recently submitted and approved major schemes suggests that most applicants are meeting the policy objective of 0.3 (commercial) or 0.4 (residential) requirement for UGF.

11.

Application Number	Ward	Scheme Type	UGF Score	Decision
20/AP/2953	North Walworth	Commercial	0.43	Awaiting Decision
19/AP/7610	Old Kent Road	Commercial	0.3	Approved
21/AP/1358	St Giles	Mixed Use/Residential	0.35	Approved
20/AP/0969	Borough & Bankside	Residential	0.409	Approved
20/AP/0944	London Bridge and West Bermondsey	Commercial	0.3	Approved

Table 1 - Applications that have submitted UGF scores

12. Whilst many schemes have provided an UGF score, some schemes have not provided one. This is usually in the case of brownfield sites, which have very low existing habitats. One such example is a scheme on 651-657 Old Kent Road (19/AP/1710). The scheme was approved, having taken into account that the existing site is a brownfield site with limited scattered scrub and perennial vegetation, which currently does not benefit from any urban greening. The proposals include the delivery of a new public park, new public realm and roof terraces, as well as a Healthy Streets commitment which will include new street trees and a Sustainable Drainage System which incorporates green and blue roofs, rainwater harvesting and filter drains will result in significant urban greening of this site. Therefore, the urban greening of the site would be significantly enhanced because of these proposals.

13. Where schemes propose full site coverage to deliver other policy objectives (e.g. replacement or uplift of ground floor workspace), opportunities for improved urban greening may be limited and lower scores are achieved.

14. It is therefore important that Southwark Council outline a clear approach to urban greening factor that takes into account wide variety of considerations, as outlined in the steps below.

Next steps

Adopting a Local UGF Score



Figure 1 - London Plan (2021) Guidance on Urban Greening Factor

15. Policy G5 of the London Plan requires target scores to be set out in Local Plans, and the draft UGF guidance document outlines how targets should be calculated by Boroughs. The London Plan currently recommends a 0.4 UGF score as standard approach across London. The council currently applies the London Plan policy G5 in decision making.
16. We can adopt local Urban Greening Factor scores through the Early Review of the Southwark Plan (2022). However, we will only bring in local scores if there is something additional or specific local circumstances in Southwark. We will ascertain whether this is the case as proceed through the statutory plan writing process and the following steps:

Step 1: *Define a green infrastructure baseline* – mapping of existing green assets and infrastructure in the borough to prepare as a baseline figure from which to calculate a target UGF. This will require the provision of robust evidence-based research on green infrastructure in the borough.

Step 2: *Decide whether to apply a blanket or variable UGF target across the borough* – depending on the outcome of the green infrastructure baseline, consideration will be given as to whether to introduce different targets for various areas, use classes and development types based on green infrastructure baseline and opportunity areas for greening.

Step 3: *Decide a course of action for schemes that do not meet the UGF target* – the key consideration is whether schemes will be able to remedy the shortfall. Some potential options for remedy include financial contributions or offsite contributions. It may also be important to consider how any imposed remedy factors into the viability of a scheme.

Step 4: *Consider how UGF will sit amongst other environmental policies such as biodiversity net gain and carbon offset* – in particular, focus will be targeted towards the effect of these policies on the viability of schemes.

Step 5: *Undertake Regulation 18 consultation on proposed policies* – once a decision has been made as to whether to adopt the London Plan UGF target or to adopt our own target, the proposal will undergo a 12-week public consultation.

The indicative timetable for this process is set out in the Early Review below.

Providing Guidance to Planners and Developers on UGF

17. Once we have outlined our approach to UGF, we will issue clear guidance to supplement the Mayor's [Urban Greening for Biodiversity Design Guide](#) and to provide Southwark-specific guidance to developers, landowners and planners where necessary on how best to approach integrating UGF requirements through the design of new development. UGF requirements should be considered from the outset of the design process to ensure site specific constraints can be considered and opportunities be fully realised, including the potential to link on-site greening into the wider green infrastructure network.

Early Review of Southwark Plan

18. The National Planning Policy Framework (NPPF) now requires policies in local plans to be reviewed at least every five years. By focusing on updating key planning policies as opposed to a full plan review, policies may be adopted and implemented more quickly through an Early Review allowing the council to respond to new or emerging national policy such as new national planning guidance on how to implement the latest Carbon Budget Order through the planning system; any new London climate change policies, guidance and initiatives developed by the Mayor of London; and will ensure new and revised policies are underpinned by relevant and up-to-date evidence base.
19. Southwark's planning policies in the adopted Southwark Plan (2022) have been prepared to attain the highest possible onsite carbon reductions, and as such focus on the largest carbon emitters associated with residential buildings: heating, cooling and power. All development, including residential, should approach achieving carbon reductions using the energy hierarchy framework outlined in the London Plan (2021):
- Be lean: energy efficient design and construction, including building fabric and materials, orientation, aspect and passive cooling
 - Be clean: Further carbon savings should then be sought using a low carbon energy supply such as decentralised energy networks.
 - Be green: once savings have been maximised at the previous two stages, the use of renewable energy generation such as photovoltaic panels should be incorporated.
20. It is imperative the Council effectively implements its new policies to secure carbon emission reductions in line with new policy targets. For example, we will work with applicants and developers to successfully implement the new energy policy (P70) to reduce on-site emissions through each stage of the energy hierarchy and utilise sustainable design.
21. The New Southwark Plan was prepared against the statutory and legal net zero 2050 target. To meet the council's 2030 net zero target, a review of planning policy will now take place to develop innovative new policy.
22. The council's Local Development Scheme (LDS), which sets out the timetable for the preparation of the next plans and guidance that the council will prepare, is currently being updated and will be available soon. However, the Early Review will commence this year and stakeholders will be fully involved in the process.
23. The LDS will also include estimated timescales for the Early Review and its required statutory public consultations and eventual route to formal submission to the Secretary of

State and another Examination in Public.

24. Environmental policies that will be explored in the LDS which support the Climate Emergency objectives may include:
- A local Urban Greening Factor/s for the borough
 - Biodiversity Net Gain
 - Sustainability Standards
 - Air Quality
 - Transport
25. We recognise that our energy policies need to go further and tackle carbon emissions from other forms of new development. The Early Review will consider new or revised emission targets for minor development and small sites, major commercial development, and other typologies of development that require planning permission. The Early Review will look to address the 'performance gap' between consented and completed schemes, embodied carbon, whole life cycle carbon, circular economy principles, fabric first performance and a review of the energy hierarchy to promote low and zero carbon heat sources, in a fair and pragmatic way. Monitoring and viability testing will play an integral role in this, so it needs to be straightforward, robust and implementable.
26. The LDS will clearly set out milestones for guidance to support the implementation of the Southwark Plan, including a Climate Emergency and Environment Supplementary Planning Document (SPD) that will assist applicants and developers to successfully implement new policy to reduce onsite emissions through each stage of the energy hierarchy and utilise sustainable design. Preparing SPD guidance is a quicker process than adopting policy and will support improved on-site carbon emission performance.
27. We also need to be responsive to changes in national legislation and London Plan policies and guidance. National legislation around climate change and new development is changing. Prior to the adoption of the national Future Homes Standard in 2025, Interim changes to Part L of the Building Regulations (conservation of fuel and power) and Part F (ventilation) for non-domestic buildings and dwellings; and overheating in new residential buildings will come into effect in June 2022. The interim Part L Building Regulations will require better energy performance of new buildings, including on small sites. We await further detail of the national Future Homes Standard in 2025 but our policy commitments are necessary to deliver the reduction in carbon emissions that are needed more quickly. The Mayor is currently reviewing the London Plan policies that refer to Building Regulations to understand the implications of this update and we will do this as part of the Early Review.
28. Following the publication of the Greater London Authority's (GLA) 'Pathways to Net Zero Carbon by 2030' evidence base report, we are working with the GLA on how the preferred 'Accelerated Green' pathway aligns with our own ambitions and will review the implications for planning policy through the Early Review. To achieve the 2030 target, greater co-ordination and input will be needed at a national level, as well as technology advances and investment in cleaner, greener energy and heat sources. Significant behavioural change will be required to meet our 2030 target. The approach that Planning will take to contribute to this change will be through how we design, build, use, retain and replace buildings so that impacts on those who are most vulnerable is limited. The Early Review will be sensitive to this, and by taking an incremental approach, first to 2050 and then to 2030, is considered most appropriate.
29. Furthermore, we will review options for a new local carbon offset price and methodology to incentivise the reduction of on-site carbon emissions, reduce the need for offsetting,

while increasing the offsetting potential of the council's Green Buildings Fund (Carbon Offset Fund). This will be consulted upon alongside the Early Review in compliance with national guidance. The options we are considering will be informed by the latest guidance from LETI and wider evidence from sector. The viability of options will be considered.

APPENDICES

Appendices	Title
N/A	N/A

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
N/A	N/A	N/A

AUDIT TRAIL

Cabinet Member	Councillor Helen Dennis, Cabinet Member for the Climate Emergency and Sustainable Development	
Lead Officer	Juliet Seymour, Head of Policy, Building Control and the Historic Environment	
Report Author	Tom Buttrick, Team Leader, Planning Policy and Monitoring Innovation	
Version	Final	
Dated	4 March 2022	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Director of Law and Governance	No	No
Strategic Director of Finance and Governance	No	No
Cabinet Member	Yes	No
Date final report sent to Constitutional Team	4 March 2022	

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