

Environment, Community Safety and Engagement Scrutiny Commission

Wednesday 16 July 2025

7.00 pm

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

Membership

Councillor Esme Hicks (Chair)
Councillor Graham Neale (Vice-Chair)
Councillor Maggie Browning
Councillor Sabina Emmanuel
Councillor Hamish McCallum
Councillor David Parton
Councillor Leo Pollak

Reserves

Councillor Rachel Bentley
Councillor Sunil Chopra
Councillor Esme Dobson
Councillor Youcef Hassaine
Councillor Adam Hood
Councillor Darren Merrill
Councillor Reginald Popoola

INFORMATION FOR MEMBERS OF THE PUBLIC

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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

Althea Loderick

Chief Executive

Date: 8 July 2025



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Wednesday 16 July 2025

7.00 pm

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

Order of Business

Item No.	Title	Page No.
1.	APOLOGIES	
	To receive any apologies for absence.	
1.	NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT	
	In special circumstances, an item of business may be added to an agenda within five clear working days of the meeting.	
3.	DISCLOSURE OF INTERESTS AND DISPENSATIONS	
	Members to declare any interests and dispensations in respect of any item of business to be considered at this meeting.	
4.	CUSTOMER EXPERIENCE PLAN	1 - 12
	A cover report, Customer Experience Plan (CEP) and associated Action Plan are enclosed. The CEP will be going to Cabinet in September 2025.	
5.	STREETS FOR PEOPLE - ZONING CONSULTATION	
6.	PLAYGROUNDS	
7.	BIODIVERSITY SCRUTINY REVIEW - CABINET RESPONSE	13 - 51
	The cabinet response to the Biodiversity Scrutiny Review, completed by the Environment Scrutiny Commission last year, is enclosed.	

8. WORK PROGRAMME

Date: 8 July 2025

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.”

Meeting Name:	Environment, Community Safety & Engagement Committee
Date:	16 July 2025
Report title:	Customer Experience Plan 2025 – 2030
Ward(s) or groups affected:	All
Classification:	Open
From:	Dominic Cain, Director of Customer and Exchequer Services

RECOMMENDATIONS

1. That the Environment, Community Safety & Engagement committee note the details of the Customer Experience Plan 2025-2030.

BACKGROUND INFORMATION

2. The previous Customer Access Strategy (2020–2024) focused on digital channel shift and concluded in December 2024, prompting a review of current customer experiences to inform future direction.
3. Insights from this review led to the co-designed Customer Experience Plan (CEP), shaped by feedback from residents, businesses, and staff on their interactions with council services.
4. While universal services (e.g. council tax, waste collection) are generally well-received, non-universal services often require repeated contact, with concerns around responsiveness—especially for high-stakes issues like housing.
5. The CEP is action-oriented, with clear deliverables and success criteria, aiming to improve service integration, digital access, face-to-face support, and mutual understanding of service expectations.

KEY ISSUES FOR CONSIDERATION

6. The Customer Experience Plan has been developed to deliver on improved customer experience for those interacting with the council and its services. Specifically, where non-universal services are being accessed.
7. The Customer Experience Plan establishes specific actions and deliverables to address the increased appetite for more face-to-face offerings, as well as improved accessibility to services for those vulnerable residents.

8. The Customer Experience plan further outlines plans to implement new technologies to improve the experience of engaging with frontline services for the resident, with specific exploration of AI solutions. New technologies will look to be implemented for back-office processes to improve efficiency and help link services across the council.
9. The Customer Experience plan further outlines plans to implement new technologies to improve the experience of engaging with frontline services for the resident, with specific exploration of AI solutions. New technologies will look to be implemented for back-office processes to improve efficiency and help link services across the council.
10. The Customer Experience Plan will achieve its aims utilising a complementary council-wide action plan, delivering improvements across the next 5 years.
11. The progress on the delivery of the action plan will be monitored by the already established Customer Experience Plan Project Board, chaired by the Director of Customer & Exchequer Services.
12. The Customer Experience Plan and CEP Action Plan will be going to Cabinet in September 2025.

Legal / Financial Implications

13. There are no specific legal / financial implications arising from this report.

Consultation

14. Consultation has been undertaken with Strategy & Policy Board, Corporate Management Team, PolCab, and Environment, Community Safety & Engagement committee members.

Audit Trail

Lead Officer	Dominic Cain, Director of Customer & Exchequer Services	
Report Author	Dominic Cain, Director of Customer & Exchequer Services	
Version	Final	
Dated	07/07/06/2025	
Key Decision	No	
Consultation with other Officers / Directorates / Cabinet Member		
Officer Title	Comments Sought	Comments Included
Strategic Director Finance	No	No
CMT/Chief Exec (?)	No	No
Cabinet Member	No	No
Date final report sent to Scrutiny Team		07/07/2025

Foreword

COUNCILLOR STEPHANIE CRYAN

CABINET MEMBER FOR EQUALITIES, DEMOCRACY & FINANCE

This Customer Experience Plan sets out what we will do to improve the experience of residents or businesses who contact the Council to request any service, by any channel.

We have already made significant strides in improving users experience of our services. Residents rate their experience of using our in-sourced libraries and leisure centres very highly. It was gratifying to hear residents describe recent improvements to their experience of reporting a housing repair. This gives us confidence for the future. We can take further confidence from the implementation of a new, modern telephony system for our customer contact centre, and the launch of an improved Southwark Council website for easier access to services. Additionally, we successfully transitioned SMART telecare devices from analogue to digital ahead of schedule, ensuring our most vulnerable residents continue to get the support they need.

These are all things we can be proud of, but the results of recent independent research carried out on our behalf, including a survey of more than 6,000 residents and businesses highlighted some key reminders for us. It reminds us of just how strongly residents' overall perception of the Council can be influenced by a single experience of requesting a service or speaking with a member of staff. This research also reminds us that residents perceive us as one Council but find that their experience of our services is sometimes more fragmented. Finally, and perhaps most importantly, it reminds us that despite all the progress of recent years, we can still do much better.

Residents told us that their top priorities when requesting a service are clarity on what will happen next and when. They want to know if there is a change or delay without having to contact us again to find out. Younger people want to be able to do more to log and track their request online. Older people prefer the phone but don't want to be passed around from person to person. People with more complex requests want more access to face to face services. Everyone expects to be treated with courtesy and respect, while those contacting us at a time of crisis expect kindness and empathy.

By delivering the Customer Experience Plan, we aim to provide a consistently high-quality experience for all. Whichever Council service you contact, whether you do so online, in person or by phone, we will set *common standards* so you know what you should expect.

The Customer Experience Plan builds upon strong foundations. Guided by the progress we've made, it is based on feedback from our borough's residents and

businesses who have recently used our services, and the front-line staff who deliver them. The plan aligns with the overarching objectives of Southwark 2030 and the Southwark Digital Strategy. The principles laid out in this plan will apply to all council interactions, whether you are visiting one of our libraries or calling us to report a repair or attending a ceremony.

This Customer Experience Plan has been developed by you, for you. I would like to personally thank all residents and staff who were involved and contributed to the research. Your feedback has been invaluable and will help ensure a better experience in the future.

Our Vision

For residents contacting the Council to request a service, the quality of the experience matters just as much as speed and often matters more. Our vision is to transform our customers' experience of interaction with the council and its services, moving from a performance indicator driven strategy to one with the customer at its heart.

The Customer Experience Plan is a plan for our customers, setting out clearly the measures Southwark Council is taking to improve their customer experience – especially for those journeys that matter most to residents and where they tell us that the need for improvement is greatest. We will make sure that access to all our council services is simple for all customers, enable self-service where possible and offer alternative options for those who need it the most.

The Plan will serve as the 'golden thread' running through the entire Council, fostering a consistent and high-quality approach for all our customers regardless of how they access our services. Closely aligned with Southwark 2030, the Customer Experience Plan will support the three core principles included within the strategy:

- **Reducing Inequality:** The Southwark 2030 strategy states that promoting equality is essential in ensuring that everyone has the opportunities and resources needed to thrive. By creating simple, easy access to our services for all our residents, most notably our most vulnerable residents, we ensure that no one is left behind.
- **Empowering People:** We worked closely with you, our customers, to co-design this Customer Experience Plan to ensure it captures your wants and needs from your council. We will be continuing to engage with our customers throughout the lifespan of this Plan to make sure we get it right.
- **Investing in Prevention:** By engaging with our residents throughout the design process, we encouraged them to consider their expectations and

priorities for the future. This will allow the voices of those who directly interact with the council to be captured in the Customer Experience Plan

Your Views

Southwark Council conducted consultation research with residents and businesses, exploring their needs and priorities based on their experience of engaging with Council services in the previous 12 months.

The research was conducted to understand and gain insight into the experience of those with recent experience of using Council services. More than 6,000 Southwark residents and businesses were engaged through a mixed method approach including an online and telephone survey, in-person workshops, online focus groups, and 1-on-1 conversations, with fieldwork taking place between February and April 2025.

The specific objectives of the research were to:

- Understand resident's experience of contacting and engaging non-universal services they had to request rather than the service itself or the outcome of their request
- Understand recent experiences of engaging with services, both online and offline, through seven customer journeys identified as having potential pain points in customer experience. These journeys were:
 - Signing up to the Housing Register (or housing waiting list)
 - Reporting a repair in a council home
 - Enquiring about a Leaseholder Service Charge Bill
 - Making a homelessness application
 - Reporting Fly Tipping
 - Reporting Noise
 - Applying for Adult Social Care
- Gain actionable insights that can inform Southwark Council's plan, with recommendations that guide strategy and actions.

Learning from the research tells us that though most residents do not often contact the Council, the majority use at least one non-universal Council service every year, with most having a positive experience when doing so. However, the experience can be less positive when things are not dealt with first time or where there is an unexplained delay. For those who live in Council homes, or who are more reliant on Council services, or whose situation is more complex, the experience is too often less positive. We also know that those that do contact the council too often have to contact us multiple times regarding the same issue. Residents don't want to have to make these repeat requests and dealing with such requests is costly for the council.

This plan will focus on putting those things right - aiming to reduce the avoidable contact, with a specific focus on those customer journeys where resident satisfaction with their experience is lowest.

Our Customer Promise

We have developed a series of customer standards to ensure we deliver a service that is in line with what you expect and ensure your experience with our services is consistent.

1. When you contact us to request a service, by any channel, we should let you know what you should expect to happen next and when
2. We will strive to keep up to date on the progress of your request, so you don't have to contact us again
3. Wherever possible, where the Council can't help you with your request (for example where someone else is responsible for providing what you need) we will signpost you to someone who can
4. Whenever you contact us and for whatever reason, you should find us welcoming, courteous and respectful
5. We will be empathetic and understanding of your personal situation – especially when you are contacting us at a moment of crisis
6. We will be clear on how to contact us about an issue and what the Council can and cannot do to help
7. We will make it easier for you to provide feedback after you contact us for any reason or by any channel.
8. Where we fail to live up to our standards we should apologise and put things right quickly

Our Expectations of You

While we endeavour to improve our customer experience delivery, we believe that delivering an excellent customer experience is a shared responsibility. While we are committed to providing clear, timely, and respectful service, we also ask that our customers engage with us in a constructive and courteous manner. This includes treating staff with respect, providing accurate information, and using the appropriate channels to raise queries or concerns.

In line with Southwark Stands Together, we are committed to a culture of dignity, inclusion, and respect. We also enforce a Zero Tolerance Policy for violence, aggression, or discriminatory behaviour towards staff. Any form of abuse—verbal, physical, or written—will not be tolerated.

We encourage customers to take an active role in helping us improve. Sharing feedback—both positive and critical—enables us to learn and adapt. We also ask

that customers allow us reasonable time to respond, especially during periods of high demand. By working together with mutual respect and understanding, we can ensure a more consistent and positive experience for everyone.

How are we going to deliver this?

The Customer Experience Plan will be driven by four key pillars:

- Transforming Customer Experience
- Enhanced Digital Experience
- Responsive Customer Experience
- Supporting our Vulnerable Residents

These pillars, along with our key objectives, will ensure that Southwark will provide excellent customer service, accessible to all.

Pillar 1 - Transforming Customer Experience

We aim to provide a seamless and consistently high-quality service across all areas of the Council. Regardless of which service residents contact —be it housing, waste collection, or libraries—they should receive the same standard of care, professionalism, and responsiveness. The new standards are designed to embed this consistency, ensuring that every interaction reflects our commitment to deliver good customer experience. Third parties delivering services on the Council's behalf will also be expected to meet these standards and will be held accountable if they fall short. While residents recognise the broader challenges the Council faces, their perceptions are often shaped by their direct experiences—whether using a service or speaking with a member of staff. We will continuously identify opportunities for improvement, using customer feedback to inform and enhance our approach. Transparency and accountability will remain central to our ethos, with performance data published openly to build trust and demonstrate our commitment to service excellence.

Objective 1: Launch the council's commitment to improving the customer experience

- We will conduct a series of Customer Journey Reviews into the key service areas explored in the research, looking to deliver improvements in your experience from beginning to end.
- We will review our current training packages, looking to develop a new customer standards-based package for all front-facing staff

Pillar 2 - Enhanced Digital Experience

We aim to enhance our digital services while ensuring digital inclusion for all Southwark residents. Our decisions will be community-focused, keeping residents at the heart of everything we do. Our Customer Experience Plan will align with the Technology & Digital Strategy (2024-26), striving to make Southwark one of the best-

connected and leading digital boroughs in London. In doing so, we will explore the opportunities to improve customer experience throughout Council services by developing and implementing the most modern solutions where they can support both front-facing officers and back-end processes.

Objective 2: Improve your customer experience by embracing new technology

- Working closely with our Technological & Digital Service, we will process map digital engagement and identify opportunities for improvement to enhance the customer experience, prioritising areas where changes will have greatest impact on improving customer experience
- We will review how technology could improve access to services, whilst exploring how technology could improve our internal processes, increase the capacity of our officers and focus our resources on those who need them the most.

Pillar 3 - Responsive Customer Experience

Ensuring this plan enshrines fulfilling promises to residents and ensuring prompt access to services. We will build our customer experience approach through listening and acting on feedback, aiming for a “one council”, seamless service regardless of how customers engage with the council. We aspire to provide consistent experience across all channels and learn from any failings to ensure accountability.

Objective 3: Work with the services identified in our research to improve the customer experience

- We will develop more readily available information about the services in Southwark Council and what they do
- We will produce new Directories of services to enable faster and easier signposting for getting in touch with relevant services
- We will work with services to deliver on a consistent aftercare process, following engagement with services, ensuring your enquiry has been successfully resolved and provide an opportunity to give feedback on your experience

Pillar 4 - Supporting Vulnerable Residents

This plan includes actions for Southwark to make its services accessible to all residents, particularly those who are most vulnerable. The plan will ensure that information and communications are tailored to individual needs, and by further training staff to effectively support individuals with diverse requirements. Where appropriate, staff will be empowered to make reasonable adjustments, with particular focus on creating an environment where customers feel valued, respected, and supported.

Residents have made it clear that they value and benefit from face-to-face contact with the Council, particularly where those interactions are more complex and where they may need more support. There are opportunities to explore the potential for co-location within our Libraries and/or Leisure Centres.

Objective 4: Review and pilot our face-to-face offer across key services

- We will conduct a wider review of accessibility to our services in our neighbourhoods through working with our VCS partners, ensuring those most vulnerable residents have equal access to council services
- We will explore options for delivering a hub-based approach to face-to-face services and the potential for assisted self-service access points, particularly for those in the borough who need them most. We will work with Libraries and other community-based settings to ensure any face-to-face services can be accessible in your neighbourhoods and support the sharing of information on services
- We will look to build on our Cost of Living and Neighbourhood Touchdown events, delivered since 2020, to develop a forward plan for our residents.

Measuring our success

The Customer Experience Plan has been developed so we can measure whether we have been successful in the overarching aim of your customer experience in Southwark Council.

We will be measuring success across the council with a variety of methods, with some clear improvements using feedback from you, the customer.

18 months after the launch of the Customer Experience Plan, we will conduct a similar piece of research as conducted in March 2025, understanding the views of customers engaging in council services and how they have changed. This will then be conducted every subsequent year until 2030.

- **We aim to increase residents' satisfaction with their interactions with the Council by at least one third, by 2030**
- **Two thirds of residents who took part in the research were satisfied with their local area as a place to live. By the conclusion of this plan, we would aim to increase this to at least three quarters.**

By improving customer experience, expect to reduce the number of complaints and enquiries from councillor members, as customers' needs and expectations are more widely met. We will also be measuring our performance to ensure continuous development in key services.

- **We would aim to see a thirty percent reduction in the number complaints and member enquiries.**

- **We will respond to all stage 1 complaints within 10 working days and stage 2 complaints within 15 working days**
- **We will adhere to the statutory standards we much achieve, by responding to Freedom of Information Requests (FOIs) within 20 working days and Subject Access Requests (SARs) within 1 month.**
- **We will strive for resident satisfaction for those visiting our Service Point to be above 95% and 98% of users seen within 10 minutes**

With the planned improvements, we would expect to see satisfaction increase with the central contact centre, whereby most customer engagement by phone begins.

- **We would aim to see a ten percent increase in satisfaction in the contact centre**
- **We will aim to answer at least seventy percent of all your calls within five minutes**
- **We will aim to keep avoidable contacts below twenty-five percent of all contacts**

With our targeted approach to the seven customer journeys, we will consistently review progress on improving these key service areas. We will further look to include other potential pain points as they emerge over the course of the plan.

To ensure we are monitoring the success of the plan we will establish a structure of governance around the success criteria. This will ensure that the services report on progress and are held accountable to achieving success in improving customer experience.

Accompanying the Customer Experience Plan will be a detailed action plan, within which there will be specific tasks focused on reviewing the action plan at regular intervals to ensure the Customer Experience Plan remains live and focused on delivering our key actions.

The Customer Experience Action Plan 2025-2030

This Customer Experience Action Plan outlines Southwark Council's approach for enhancing customer experience for those engaging with the Council and its services. The Council prioritizes improving customer experience across all services, and the implementation of the Action Plan will commence immediately. Over the next 12 months, the commitment will be to:

1. Transform the Customer Experience

By autumn 2025, we will have launched the Customer Experience Plan, collaborating with our Communications Team to highlight the council's commitment to enhancing customer experience.

We will review our current training packages, looking to develop a new customer standards-based package for all front-facing staff.

2. Enhance the Digital Experience

We will be working hard to continue our improvements with our customer contact centre, utilising new technological enhancements to do so.

By March 2026, we will have piloted the use of AI with voice recognition and web chats, also implementing a call-back function to help reduce our call-wait times.

3. Create a Responsive Customer Experience

We will be working closely with the services identified in the research to improve the customer experience.

Using resident and staff feedback, we will be identifying immediate improvements over the next 12 months to ensure the customer experience is smoother, striving for the joined-up approach residents expect from their council.

4. Support our vulnerable residents

Within the next 12 months, we will be reviewing and piloting our face-to-face offer across all services.

We will review our face to face offer across our neighbourhoods and look at options within the borough to provide support to those who need support accessing our services, exploring options such as assisted self-serve.

Meeting Name:	Cabinet
Date:	17 June 2025
Report title:	Cabinet response to 'Biodiversity Scrutiny Review Report Recommendations'
Cabinet Member:	Councillor Portia Mwangangye, Leisure, Parks and Young People
Ward(s) or groups affected:	All
Classification:	Open
Reason for lateness (if applicable):	N/a

FOREWORD - COUNCILLOR PORTIA MWANGANGYE, CABINET MEMBER FOR LEISURE, PARKS AND YOUNG PEOPLE

Southwark Council has long recognised that protecting and enhancing biodiversity is crucial to the wellbeing of the borough, and, as such, has made it a priority. Accessible, biodiverse, open spaces provide healthy environments for all our residents, helping to reduce health inequality, and making access to nature available to all.

In Southwark, we are committed to taking action for biodiversity, raising awareness, and engaging residents with nature at all levels. Our goal is to involve all our communities, especially those with protected characteristics or limited access to nature, in delivering our biodiversity policies and activities.

It is well documented that biodiversity is in crisis, with species and habitats declining both globally and nationally. The Environment Scrutiny Commission (ESC)'s Biodiversity Review acknowledges the central role local authorities have in tackling this crisis.

Southwark has a successful track-record of enhancing the biodiversity value of our public spaces by planting meadows, woodlands and hedgerows, creating ponds and stag-beetle loggeries, reducing pesticide use, and relaxed mowing schedules.

We have continued to protect nature by extending protection to our Sites of Importance for Nature Conservation, creating healthy and thriving natural environments through our tree planting and community gardening programmes, and cleaning our air and combating climate change by making our streets greener and more resilient to extreme weather.

We are proud of Southwark's long legacy for delivering for nature, and for supporting our valued third sector partners who manage nature reserves, provide

environmental education, and deliver outreach and engagement for communities across the borough.

The Environment Scrutiny Commission's 34 recommendations are a welcome opportunity to reflect on and improve our approach towards our biodiversity goals and maintain our position as a leading London borough for biodiversity protection and enhancement.

RECOMMENDATIONS

Recommendations for the Cabinet

1. Approve this report as the Council's response to the 34 recommendations put forward by the Environment Scrutiny Commission's Biodiversity Review, as set out in the Overview and Scrutiny Procedure rule 15.3.
2. To accept 10 recommendations and partially accept 24 recommendations for reasons outlined in this report.

Recommendations for the Leader of the Council

3. N/a

REASONS FOR RECOMMENDATIONS

4. Southwark is committed to protecting biodiversity and increasing access to nature, continuing the council's strong legacy of action for the environment. Biodiversity is in crisis, with species and habitats suffering global and national declines. Protecting and enhancing biodiversity for both nature and people is a statutory requirement, as required of the Biodiversity Duty, and is critical to the health and wellbeing of the borough and our residents.
5. We welcome the Environment Scrutiny Commission (ESC)'s Biodiversity Review as an opportunity to reflect on and improve our approach towards our biodiversity goals and maintain our position as a leading London borough for biodiversity protection and enhancement.
6. Our specific response to each of the ESC's 34 recommendations is outlined in detail below. We have made our recommendations acknowledging that taking actions for nature recovery by the Council is dependent on officer and financial resources, working within the remit of the Council's jurisdiction, existing legislative and policy frameworks, abiding by best professional practices, consideration of competing council priorities, particularly for land, and practical considerations around infrastructure, safety, and accessibility.
7. The commission's recommendations impact various departments across the council. All relevant service areas have contributed to the response set out in this report.
8. Many of the over-arching recommendations consist of several 'Priority Actions' (sub-recommendations). Where Priority Actions are numerous and varied, it has only been possible to Partially Accept rather than fully accept the Recommendation as a whole. The explanatory detail behind this is set out in

the 'Response to Recommendation' column. For example, some of the actions may have already been implemented while some are actively being worked towards fulfilling, either in whole or in part. In addition, some require the council to review or implement policies which may already be in progress, or where responsibility for delivery sits outside the Council - with other authorities, agencies or organisations.

ALTERNATIVE OPTIONS CONSIDERED AND NOT RECOMMENDED

9. None - The council's constitution requires that a response to scrutiny recommendations is made to cabinet.

POST DECISION IMPLEMENTATION

10.	Key Activity	Target completion date
	Publication of Climate and Environment and Householder Supplementary Planning Documents (SPD)	Summer 2025
	Climate Change Action Plan and Strategy - review at cabinet	September 2025
	London Local Nature Recovery Strategy (LNRS) publication	Autumn 2025
	Southwark Biodiversity Partnership Terms of Reference agreed	Autumn 2025
	Conduct borough-wide Ecology Survey and SINC Review	7 January 2026
	Publication of first Biodiversity Duty Report	March 2026
	London Green Infrastructure Framework (LGIF)	Autumn 2025
	Develop Southwark's next biodiversity strategy, to replace the SNAP	2026

BACKGROUND INFORMATION

11. Southwark has a long legacy and strong track record of protecting and enhancing our natural environment. Biodiversity is a central priority for the council, considered across departments and functions, with multiple objectives and commitments within several major policies. Our current Southwark Nature Action Plan 2020 (SNAP) identifies the strategic vision for biodiversity in the borough, building on the success of previous biodiversity strategies dating back almost twenty years. The council welcomes the recommendations arising from the Environment Scrutiny Commission's Biodiversity Review as an opportunity to showcase our historical achievements and ongoing action for biodiversity, as well as demonstrate innovative ideas that can guide nature recovery in Southwark into the future.
12. The Environment Scrutiny Commission (ESC) was constituted in 2019/20, with

reviews taking a lead from the Council Assembly's declaration of a Climate Emergency in March 2019. The ESC's Biodiversity Review comes from evidence heard at a series of Scrutiny meetings, largely from 2023-2024, with a focus on biodiversity and the biodiversity crises, in response to growing public awareness and government prioritisation of this issue.

13. The 34 recommendations of the ESC's Biodiversity Review were approved for consideration by Cabinet on 3 December 2024 (see Background Documents). Overview and Scrutiny Procedure [rule 15.3](#) requires Cabinet to consider and provide a written response to the report within two months, which this report constitutes.

KEY ISSUES FOR CONSIDERATION

COMMISSION'S RECOMMENDATION 1 TO CABINET	
1.	<p>Adopt the Biodiversity COP 15 commitment known as 30x30, which calls for the effective protection and management of 30% of the world's land, fresh waters and oceans by the year 2030, as a strategic local aim. Adopt also, the Kunming-Montreal Global Biodiversity Framework (GBF) which aims to “catalyse, enable and galvanize urgent and transformative action”. This calls for action at an international, national and local level and, as such, will align local ambition and pride to national and global ambition. This is a proven way to increase commitment to pro-environmental behaviour changes¹.</p> <p>Priority Actions:</p> <ul style="list-style-type: none"> • Develop the updated Southwark Nature Action Plan (SNAP) with the Global Biodiversity Framework (GBF) and 30x30 aims. • Build the 30x30 aim into the development of Ecological Networks and the Green Infrastructure Strategy. • Include a commitment to 30x30 and the Global Biodiversity Framework (GBF) in the Climate Strategy and Action Plan. • Update the Thriving Nature theme referred to in the Climate Change Resilience and Adaptation Strategy and Climate Change Strategy, to ensure the Climate Change Action Plan includes sufficient provision for biodiversity, including a delivery plan for Ecological Networks, measurable objectives for habitat protection, habitat creation, and de-paving as default, wherever possible. • Incorporate a commitment for the Council to see all areas of council policy not only through the prism of a Climate Emergency but also through the prism of a Biodiversity Emergency. • Communicate the 30x30 and GBD as a global and local ambition to stakeholders and residents and encourage civil society to adopt the GDF and 30x30 alongside Net Zero by 2030. • Review Southwark SINCS with view to increasing size and number. • Identify other ways to protect habitat by working with communities, landowners, householders and other stakeholders. <p>¹ See section 5: https://www.frontiersin.org/journals/environmental-science/articles/10.3389/fenvs.2023.1103635/full</p>
RESPONSE TO RECOMMENDATION 1	

1.	<p>We agree developing our future biodiversity policies and strategies in line with international frameworks and agreements would boost the profile of biodiversity and help incorporate biodiversity considerations across all council departments and functions.</p> <p>A commitment to 30x30 (protecting 30% of Southwark's land for nature by 2030) would require cross-departmental commitments and collaboration with external landowners. At present, 24% of Southwark is designated as either a Site of Importance for Nature Conservation (SINCs) or an Open Space under the Local Plan. However, not all this land is owned or managed by the council, and not all is delivering for biodiversity. There are additional opportunities to designate land for biodiversity outside of these designations through new development, or on housing, highway, institutional, and private land. A scoping exercise would first be necessary to determine whether meeting 30x30 is realistic in Southwark, given the significant competing demands for land.</p> <p>We are currently undertaking a borough-wide ecological survey and review of Southwark's SINC network with the possibility of increasing their size and number. This will contribute to 30x30 but will not be sufficient to reach the final 30% target alone.</p> <p>Officers continually strive to identify novel ways to protect and enhance land for biodiversity and regularly work across council departments and a wide range of local landowners, community groups and stakeholders to protect and enhance nature.</p> <p>The process to develop the next iteration of the Southwark Nature Action Plan (SNAP), will be led by the Parks & Natural Environment team (PNE), following the publication of the Local Nature Recovery Strategy (LNRS) for London by the Greater London Authority (GLA), expected in late 2025. This recommendation can be considered as part of this process.</p> <p>Planning Policy will investigate the recommendation as part of the review of the Southwark Plan. This will involve undertaking research and commissioning evidence on greening and open space issues as part of the technical evidence to support the Southwark Plan.</p> <p>There is the potential to include this recommendation in the Climate Action Plan should a scoping exercise be completed to determine feasibility.</p>
RECOMMENDATION 1: PARTIALLY ACCEPTED	

COMMISSION'S RECOMMENDATION 2 TO CABINET	
2.	<p>Prioritise development of a Green Infrastructure Strategy to map out a coherent Ecological Network for Southwark, which:</p> <ul style="list-style-type: none"> i. Maps current SINCs and green and blue spaces ii. Identifies opportunities to increase the size of current SINCs. iii. Joins up or enhances connections between wildlife SINCs, either through physical corridors, or through 'stepping stones'.

- iv. **Aids the creation of new wildlife SINCS**
- v. **Reduces the pressures on wildlife by improving the wider environment, including through buffer-zones around wildlife SINCS (amended from Lawton, 2010)**

Priority Actions:

- Account must be taken of the full range of semi-natural habitats needed by wildlife. Gaps must be identified (e.g. ponds, absent in many areas of Southwark) and plans developed to address these gaps.
- Consider designing nature-friendly crossings of major barriers to nature, such as Jamaica Road at Southwark Park/King's Stairs and Old Kent Road. Consideration should be given to reducing traffic, noise and artificial light, and to increasing vegetation at key locations, including overhead "canopy bridges".
- Several of Southwark's existing major wildlife corridors end just short of Peckham's Rye Lane area. Consider designating Peckham as a Missing Link / Biodiversity Connectivity Zone and implementing special measures to encourage the development of wildlife affordances in this area.
- The Ecological Network, and Green Infrastructure Strategy, should be co-designed and monitored in conjunction with the Southwark Biodiversity Partnership (the Southwark Nature Action Plan (SNAP) reference group), and other local groups/stakeholders, recognizing and building on existing greening efforts by community groups and landowners.
- The Green Infrastructure Strategy should be led by the council's Planning department, as part of a cross departmental initiative that recognises the interrelationships between Planning, Climate Change, Parks, Housing, Flood Management, Highways, Air Quality and other departments, while maintaining a co-design approach with the Southwark Biodiversity Partnership.
- Link the development of Southwark's Green Infrastructure Strategy and local Ecological Network with the development of the citywide LGIF and LNRS, working with the GLA as an active and informed partner.
- The Green Infrastructure Strategy should:
 - I. identify geographically specific opportunities for cross-borough collaboration, ensure existing green infrastructure is optimised and existing barriers to wildlife movement are reduced, and consider green infrastructure in an integrated way as part of a wider network connecting to neighbouring boroughs.
 - II. recognize a buffer zone around SINC boundaries, with attention to reducing artificial lighting, noise, height limits for tall buildings (overshadowing) and traffic and increasing habitat for wildlife through de-paving, and installation of green roofs.
 - III. Look to use development and redevelopment opportunities to provide new green spaces and extend and link existing greenspaces and parks.
 - IV. Integrate Food Growing.

RESPONSE TO RECOMMENDATION 2

2. Taking account of ecological connectivity is a priority in several council policies, including the Southwark Plan and Climate Change Action Plan. Officers aims to support projects that are in strategic locations for habitat networks, for example, the North Bermondsey Wildlife Corridor, the North

Camberwell Wildlife Corridor, the Low Line project, and Buglife's B-Lines project.

We are working towards reviewing our SINC's and other habitat opportunities across the borough through our borough-wide ecological survey taking place this year, with the possibility of increasing their size and number. Our work as a supporting authority to the GLA to develop the London Local Nature Recovery Strategy (LNRS) will also contribute towards this recommendation, through identifying opportunity areas for biodiversity recovery, and incentivising the delivery of Biodiversity Net Gain (BNG) in new developments within areas of strategic significance for biodiversity.

The next iteration of the Southwark Nature Action Plan (SNAP) – our primary biodiversity strategy – must take the LNRS into account, as per the strengthened Biodiversity Duty required of local authorities. Following the LNRS, our next biodiversity strategy will be required to have a strong spatial component, and ecological connectivity will be a significant consideration.

Artificial canopy bridges are not an appropriate conservation intervention in Southwark, which lacks arboreal mammals of conservation concern that would benefit from this type of measure. Tree canopies can naturally form bridges over a road depending on tree species and age, road size, and safety.

'Streets for Nature' is one of the central pillars for the Streets for People programme and a key focus of this work is on the interface between the natural world and the built environment. This includes the mapping of these sites and their relation to the transport network.

Through the provision of enhanced connectivity by walking and cycling especially, the programme aims to improve access to these sites and public enjoyment of them. As a result, this would increase the value placed on them and therefore increase demand for the number and depth of such sites.

An Open Space Needs Assessment along with the Green Infrastructure Strategy, SINC review and LNRS will identify opportunities to increase and enhance connectivity for biodiversity.

A Green Infrastructure Strategy for Southwark will draw on a range of sources. This will include the open space and greening elements of the Climate and Environment Supplementary Planning Document (SPD), a new Open Space Needs Assessment and a SINC Review, currently in progress. The GLA are also in the process of developing a London-wide Nature Recovery Strategy which will inform the borough-specific work.

The Green Infrastructure Process Guide for Local Planning Authorities (September 2024) and Natural England Green Infrastructure Framework will be followed, as well as London Plan policy guidance.

RECOMMENDATION 2: PARTIALLY ACCEPTED

COMMISSION'S RECOMMENDATION 3 TO CABINET

3.	Improve the engagement, governance and oversight of the SNAP by putting forward a Terms of Reference document, for the Southwark Biodiversity Partnership to consider and adopt, as it sees fit. Ensure, as far as possible, that the Southwark Biodiversity Partnership has a clear remit to report on delivery of the SNAP through the agreed Terms of Reference, including providing the SNAP annual report to Cabinet as part of a wider report on Biodiversity performance.
RESPONSE TO RECOMMENDATION 3	
3.	<p>The Southwark Biodiversity Partnership (SBP) is composed of multiple organisations who would need to collectively agree on any Terms of Reference, or whether they want to contribute to an annual report. This is not a Council decision, although we can support in these functions.</p> <p>The SBP has moved towards greater independence since 2024 and is now chaired by an independent voluntary chair. A revised Terms of Reference is currently in draft. Oversight of the current SNAP (as the primary biodiversity strategy for Southwark), and engagement with future biodiversity strategies is included as a draft objective of the group, although final wording is still to be agreed by the partner organisations.</p>
RECOMMENDATION 3: PARTIALLY ACCEPTED	

COMMISSION'S RECOMMENDATION 4 TO CABINET	
4.	<p>Explore methods of delivering biodiversity improvements through the Planning process, beyond the minimum 10% Biodiversity Net Gain (BNG) specified in the Environment Act 2021 when undertaking the 2027 review of the Southwark Plan and through Special Planning Documents (SPD). This should be combined with more ambitious Urban Greening Factor (UGF) targets. Improvements to both, taken together, are most likely to deliver better outcomes for biodiversity.</p> <p>Priority Actions:</p> <ul style="list-style-type: none"> • Having adopted the London Plan guidance on UGF of 0.3 for predominantly commercial and 0.4 for predominantly residential developments, the council must ensure that, in accordance with the guidance, these targets are treated as the minimum benchmark rather than the maximum required. • Ensure the UGF is adopted into the current SPD on Climate and Environment, currently being consulted upon. • Monitor BNG and UGF for compliance, with a view to achieving at least the required 10% BNG on-site as well as the UGF floor targets. • Ensure continued monitoring and spot auditing of BNG delivery throughout the 30-year period. • Explore the following in the review of the Southwark Plan: <ul style="list-style-type: none"> ○ Increasing the BNG to above the present 10% improvement on baseline. ○ Applying a minimum 0.4 UGF to all major commercial as well as residential projects. ○ Applying UGF targets to smaller projects as well as major sites.

	<ul style="list-style-type: none"> Adopting higher targets for BNG and UGF at strategic locations, as defined by the Green Infrastructure Strategy/ Ecological Network, such as SINC buffer zones or in areas with poor existing wildlife connections.
RESPONSE TO RECOMMENDATION 4	
4.	<p>The GLA sets out the Urban Green Factor (UGF) in Policy G5 Urban Greening of the London Plan and Urban Greening Factor London Plan Guidance. Further detail is set out in London Plan guidance. All local authorities will need to align with this guidance. The UGF guidance is set out in the Climate and Environment SPD, which aligns with current London Plan guidance and provides additional detail. Applicants are expected to meet these standards set out in the London Plan policy. The planning policy team are monitoring compliance with BNG and UGF requirements.</p> <p>The Southwark Plan Review will examine evidence and best practice from around the country in relation to the impacts of increasing the Biodiversity Net Gain (BNG) and UGF requirements. All London Boroughs are currently using the 0.4 and 0.3 targets as set by the London Plan planning practice guidance. Westminster is exploring the development of a locally specific UGF based on the Wild West End (WWE) Matrix. This will be investigated further as part of the Southwark Plan review.</p> <p>The national urban greening factor guidance has also been updated. The Green Infrastructure Process Guide for Local Planning Authorities, dated September 2024, is considered best practice. This guidance will inform our evidence for policy development for greening in the Southwark Plan review.</p> <p>It should be noted that it can be challenging to meet the current UGF scores set out in London Plan guidance, particularly for non-residential development. For example, achieving greening on roof space can conflict with other Southwark Plan policies, e.g. the delivery of solar panels on the roof of buildings to reduce carbon emissions. Some smaller sites are also not always able to meet UGF maximum site coverage due to amenity considerations.</p> <p>BNG systems are setup to allow the ongoing monitoring of BNG. A fee for the 30-year monitoring BNG categorised as 'significant' is set out in the S106 and CIL SPD, which is going to Cabinet in July.</p> <p>The additional evidence required for a new BNG target will be assessed as part of the review of the Southwark Plan. An increase in mandatory BNG above 10% is also not encouraged by Planning Practice Guidance for Biodiversity (2024). Paragraph 6 sets out that: <i>'Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.'</i></p>
RECOMMENDATION 4: PARTIALLY ACCEPTED	

COMMISSION'S RECOMMENDATION 5 TO CABINET

5. **Wherever possible new major residential developments should be conditioned to include grey water recycling and rainwater harvesting, including providing for storage of rainwater in water butts or similar to support community gardening and food growing.**

RESPONSE TO RECOMMENDATION 5

5. The Climate and Environment SPD has been updated to encourage the inclusion of food growing spaces to support community gardening and for the provision of access to water for this purpose.

Food growing is supported in the Local Plan but there are currently no formal planning requirements to deliver or designate sites for food growing. It is therefore difficult to mandate rainwater storage for food growing. The installation of a water butts is an issue which is outside of the planning process, as planning permission is not required for their installation. However, this is encouraged in the Climate and Environment SPD.

Policy P68 Reducing Flood Risk of the Southwark Plan sets out the drainage hierarchy to ensure new development is minimising the risk of surface and fluvial flooding. This includes grey water attenuation.

RECOMMENDATION 5: PARTIALLY ACCEPTED

COMMISSION'S RECOMMENDATION 6 TO CABINET

6. **Explore how domestic planning applications could be conditioned or, at least, applicants could be encouraged to include wildlife friendly features such as green roofs, flow-through planters, rain gardens, swift bricks, insect houses (for example in cases of loft conversions) and water butts, and to minimise impermeable hard surfacing**

Priority Actions:

- The council should develop and make available on its website a mini-guide for homeowners and developers applying for planning permission for minor developments or home improvements, with information on the benefits of these nature-friendly features.
- The council's climate change team should engage with Thames Water to explore how more residents can be encouraged to install water butts at their homes, for example, by Thames Water managing the subsidised delivery of water butts to residents. (This could be modelled on the existing composting scheme, where residents can buy compost bins at a subsidised rate and community groups, places of worship and schools are able to claim 2 free bins each.)
- Update the New Homes Design Guide to take account of the recommendation on the right
- Update the Householder SPD to take account of the recommendations outlined on the left

RESPONSE TO RECOMMENDATION 6	
6.	<p>Mandatory BNG is not legally required for householder applications. The Householder SPD has been amended to include a section on biodiversity enhancements which are appropriate for residents. Swift brick specifications are also included in the Climate and Environment SPD. Bird boxes are encouraged in the Householder SPD.</p> <p>Swift bricks are encouraged on householder applications where relevant. These are imposed via planning condition.</p> <p>The Householder Development SPD sets out guidance for crossovers and approach to front gardens including permeable surfaces and greening applications.</p> <p>This recommendation is an example of a possible new action that can be considered as part of the Climate Action Plan review to determine the role of the Climate Change Team and priority level.</p>
RECOMMENDATION 6: PARTIALLY ACCEPTED	

COMMISSION'S RECOMMENDATION 7 TO CABINET	
7.	<p>Update the draft Climate and Environment Supplementary Planning Document (SPD) and Householder SPD to incorporate the review recommendations.</p> <p>Where this is not possible bring forward a Biodiversity (SPD) and update versions of the Southwark Plan</p> <p>Priority Actions:</p> <ul style="list-style-type: none"> Consider this report in part as a response to the consultation on the Climate and Environment SPD and Householder SPD
RESPONSE TO RECOMMENDATION 7	
7.	<p>Planning policy:</p> <p>The Climate and Environment SPD includes a section on Biodiversity, open space and greening. This includes a specific section on how to meet biodiversity requirements onsite and the mandatory BNG requirements.</p> <p>The Householder Development SPD has been revised to include a section on biodiversity and how it can be encouraged onsite. Most householder applications are exempt from mandatory Biodiversity Net Gain under national policy. Householders are encouraged to implement measures to improve biodiversity outside of the mandatory biodiversity net gain requirements.</p>
RECOMMENDATION 7: PARTIALLY ACCEPTED	

COMMISSION'S RECOMMENDATION 8 TO CABINET	
8.	<p>Adopt the full dark sky recommendations from All-Party Parliamentary Group (APPG) Dark Skies Policy Plan (appgdarksdies.co.uk) including</p>

	<p>standards on the setting, brightness, colour temperature and density of lighting.</p> <p>Priority actions:</p> <ul style="list-style-type: none"> • Encourage adoption in the new London Plan.
RESPONSE TO RECOMMENDATION 8	
8.	<p>The London Plan Policy D8 Public Realm sets out that - Lighting, including for advertisements, should be carefully considered and well-designed to minimise intrusive lighting infrastructure and reduce light pollution.</p> <p>The GLA's Streetscape Guidance (2022) provides advice on how to avoid light pollution in the design of London's streets and spaces.</p> <p>The London Plan is currently being reviewed for update; the Council could make a representation on this to encourage darker skies.</p> <p>The Southwark Plan will align with GLA guidance for new development. The scope of the review will depend on the detail of the APPG Dark Skies recommendations.</p> <p>It is noted that existing planning policy is contributing to reducing light pollution in the borough.</p> <p>Where relevant, a wildlife friendly lighting design is imposed via condition on a case-by-case basis to mitigate the impact of light on wildlife.</p>
RECOMMENDATION 8: PARTIALLY ACCEPTED	

COMMISSION'S RECOMMENDATION 9 TO CABINET	
9.	<p>Conduct an ecological audit of our parks, estates, verges, schools, sports fields, and pockets of land in order to increase habitat for wildlife and adopt wildlife friendly practices.</p> <p>Conduct this in conjunction with the development of Ecological Networks.</p>
RESPONSE TO RECOMMENDATION 9	
9.	<p>The council are currently undertaking a borough-wide habitat survey and SINC review. This will both audit our existing wildlife sites but also identify and assess new sites for designation. However, conducting ecological surveys and detailed habitat mapping is resource heavy, so this project is limited to SINC's, Open Spaces, and some strategic novel spaces identified by the consultant through a gap analysis as having high potential for wildlife. We are taking a strategic approach to identify areas of land with the greatest opportunity for nature recovery or need for protection. This approach already considers whether sites are strategically located to improve ecological networks.</p> <p>The development of the London LNRS by the GLA, with input from LB Southwark as a supporting authority, identified through both internal and</p>

	<p>public consultation a series of Areas that Could Become of Importance for Biodiversity (ACBs). ACB sites are outside of existing wildlife sites and identify novel opportunity areas for nature recovery. The final version of this strategy, including the map of ACB areas is due for publication in autumn 2025.</p> <p>Undesignated land faces several competing demands, particularly from housing need. Ultimately, formal designation of new spaces /changing land use within the Local Plan is a Planning Policy decision.</p> <p>The council has already adopted a range of wildlife friendly practises across our parks and open spaces, including the elimination of scheduled pesticide use, the relaxation of mowing regimes, and the retention of deadwood on-site.</p> <p>The council's Ecology officers provide regular support across Council teams, community partners and private landowners on how they can adopt further wildlife friendly practises in project design, delivery, and ongoing maintenance.</p>
RECOMMENDATION 9: PARTIALLY ACCEPTED	

COMMISSION'S RECOMMENDATION 10 TO CABINET	
10	<p>Undertake a mapping exercise with ward councillors and community stakeholders (as recommended by Southwark Land Commission) to identify further land that is currently or can potentially be enhanced for biodiversity. Consider how undesignated open space, such as land currently used for parked vehicles, estate lands, schools, sports field borders, and rooftops, could be transformed and/or managed as places for nature as well as people.</p>
RESPONSE TO RECOMMENDATION 10	
10	<p>Mapping exercises to identify land that is can potentially be enhanced for biodiversity is currently underway through our Borough-wide ecology survey and SINC Review, the development of the LNRS, and the Streets for People programme as outlined elsewhere in this report. The SINC Review and LNRS development involved public or community stakeholder consultation elements to identify sites with potential for biodiversity. We welcome suggestions from residents or ward councillors for pieces of land identified as possible opportunities for nature.</p> <p>We are committed to continue our work with the GLA and the community to identify land of current value for biodiversity or could potentially be enhanced for nature recovery.</p>
RECOMMENDATION 10: ACCEPTED	

COMMISSION'S RECOMMENDATION 11 TO CABINET
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1	When allocating funding for Council projects – i.e. Cleaner Greener Safer (CGS), Devolved Highways Budget (DHB) and others, ensure that the budget covers the costs of the appropriate number of council officers, including experienced project managers and others who are trained in biodiversity improvements (see recommendation 22).
RESPONSE TO RECOMMENDATION 11	
1	<p>The cost of Cleaner Greener Safer (CGS) officers is covered in the overall CGS capital allocation and is top sliced before funding is allocated to individual projects so our costs are covered before we start. Any other council officers we use for help and advice are covered by their own budgets.</p> <p>CGS officers work closely with the council's Ecology and Tree services for expertise and advice on biodiversity related improvements.</p>
RECOMMENDATION 11: ACCEPTED	

COMMISSION'S RECOMMENDATION 12 TO CABINET	
1	<p>Depaving has the potential to be a powerful tool against the biodiversity and climate crises and in support of the Climate Change Mitigation and Adaptation Strategy, particularly with regard to flood risk management. In recognition of this, the Commission recommends the following:</p> <ol style="list-style-type: none"> Adopt de-paved as default, wherever possible, in all new Streetscape or housing schemes. Increase our greenspace by de-paving the many unused areas of existing hardstanding to make room for 'pocket parks', new street trees, hedgerows, rain gardens, food growing spaces and other forms of new planting. <p>Priority Actions:</p> <ul style="list-style-type: none"> Integrate de-paved as default with the BNG and UGF approach Employ an internal design review process to ensure that any new streetscape or housing projects incorporate: <ul style="list-style-type: none"> green wildlife habitat SuDS and other permeable spaces to facilitate water attenuation to the maximum extent possible. All projects to redesign our Streetscape and other public realm must be treated as opportunities to improve the borough's biodiversity and flood risk management, rather than purely as functional and/or traffic engineering solutions. Proposals should be flagged as a matter of course with the Southwark Biodiversity Partnership, to ensure that they benefit at the design phase from a wide range of input from landscape architects, horticulturalists, ecologists, urban food growers and community leaders As part of this, ensure that the Streetscape design, Climate Action Plan, SNAP, Streets for People strategy, Local Flood Risk Management Strategy, Southwark Plan and the Tree Management Policy 2020 are updated to provide a coherent approach to adopting de-paving as the default, wherever possible. Ensure that teams engaged in design and execution of the above, as well as the teams handling the design and execution of Cleaner Greener Safer projects across the borough, are updated and working in accordance with the ambition to de-pave.

- Highways department should routinely consider applications from utility companies involving excavation of public space in the light of possible green infrastructure projects. Where possible, any scheduled infrastructure projects which involve digging or de-paving to access underground utilities should be coordinated with permanent improvements to improve permeability, increase public green space and improve bio. Where possible, de-paving should be designed to be integrated with stormwater management at area drains, to “slow the flow.”
- The council should explore all possible sources of funding for the various depaving initiatives described, including DEFRA, Thames Water, GLA, insurance companies and environmental NGOs like the London Wildlife Trust.
- Establish a strategic approach to de-paving linked to the Ecological Networks and Green Infrastructure Strategy recommended above.
- Aim for 30% minimum planting for streetscape schemes.
- Encourage and enable interested local residents to adopt de-paved sites and contribute to management and maintenance. Work closely with local community to sensibly design de-paved areas in keeping with local needs, and form maintenance agreements for planted areas.
- Make a program of technical guidance and support available to any residents wishing to de-pave their own private land.
- Where the budget is limited, deliver green spaces with high biodiversity value, and acceptable aesthetic value, by providing an initial seeding of wildflowers, encouraging tolerance of volunteer plants, delivering annual mowing, and ongoing litter picking.
- The Council must mandate (or strongly advise where powers are limited) the use of permeable materials for ground cover wherever possible. Non-permeable materials should be accepted only if there is a technical justification given for permeable materials not being suitable.

RESPONSE TO RECOMMENDATION 12

1 The Streets for People (SfP) programme is identifying the usage and network value of roads, identifying where the possibility exists to de-pave and return streets to a more natural function. The programme is also delivering pocket parks, trees and other planting solutions, often as part of sustainable urban drainage (SuDS) schemes, across the network and as a component of all schemes delivered.

Through SfP's coordination with other council departments, e.g. Parks and Natural Environment and 'Cleaner, Greener, Safer' (CGS) the hope is to create additional community demand for such changes.

In line with the Natural England Green Infrastructure Framework, the Southwark Green Infrastructure Framework will include detail on green connections and green spaces, many of which serve a dual purpose as SuDS.

The Climate and Environment SPD details best practice advice for the delivery of green space and SuDS. Biodiversity Net Gain (BNG) concerns habitat creation as part of new developments. Depaving is considered by as part of an overall scheme's biodiversity approach on a previously developed site.

The Natural England Green Infrastructure Framework and the Green Infrastructure Process Guide for Local Planning Authorities will be followed.

These evidence base documents will be used to inform the development of policy around greening in the review of the Southwark Plan.

Ecology and Tree officers regularly support Highways schemes to ensure maximum delivery for biodiversity, such as providing advice on plant and tree species selection and maintenance schedules, within the constraints of street schemes including accessibility, safety, cost, maintenance and infrastructure (e.g. underground services).

The council are already working on resident-led depaving projects, such as the Moreton Gate Nature Garden, and strive to support future depaving projects, wherever possible.

The Southwark Biodiversity Fund administered by the Climate Change Team aligns our community engagement, habitation creation and de-paving ambitions, and is also supported through climate adaptation projects delivered in coordination with Highways and Flood teams.

RECOMMENDATION 12: PARTIALLY ACCEPTED

COMMISSION'S RECOMMENDATION 13 TO CABINET

- 1 The Council should adopt a default position that recognises installation of Vehicle Footway Crossovers (VFCs) and associated hard standings as an environmental and social ill which stands at odds with council policies including the Climate Emergency Action Plan, the Climate Emergency Resilience and Adaptation Plan, the Streets for People strategy and the Equal Pavements Pledge (as the repetitive undulation of pavements due to installation of VFCs can be an obstacle to disabled pedestrians and wheelchair users). For these reasons, the council should actively discourage and take steps to reduce the rate and extent of this loss of front gardens and installation of new VFCs wherever possible, publicise its reasons for doing so and ensure that legal obligations relating to hard standings are enforced.**

Priority Actions:

- Highways and Planning work together to bring forward a new policy on VFCs, including greater enforcement, and that this incorporates the below points:
 - a. There should be a presumption against the installation of VFCs where there is a Controlled Parking Zone (CPZ) in place and/or high parking stress.
 - b. The minimum depth of front garden required for a property to be granted a VFC should be immediately increased to 6m, to ensure that it is large enough to accommodate a modern vehicle without obstruction to the public footway.
 - c. Council tenancy agreements should specifically prohibit tenants from paving over front gardens and there should be a presumption against

the granting of a VFC. This could be reviewed in exceptional individual circumstances.

- d. In an effort to inform the public and discourage further loss of front gardens, details of the adverse environmental impacts of loss of planting and permeability from front gardens should be posted on the council's website under the section where residents apply for a VFC and sent to residents in response to their application. (This could be done by setting up a dedicated email address for applications with an automatic response.) Residents should be asked to confirm that they read and understood the information provided before confirming that they wish to go ahead with their application.
- e. In the event that an application for a VFCs is granted, applicants should be routinely provided with guidance on minimising the adverse environmental impact of the associated front garden conversion, including advice on paving the minimum area required and maximising permeability and planting based on best practice as described by organisations such as the RHS and National Park City Foundation. Applicants should also be informed of their legal obligations in respect of the Town and Country Planning (General Permitted Development) (Amendment) (No. 2) (England) Order 2008 which requires front garden hard surfacing of more than five square metres in area "to either be made of porous material or, if an impermeable surface, to direct runoff to a soakaway area or rainwater storage within the property's boundary"
- f. Increase the application fee and installation charge for VFCs. The increased charge for installation of the VFC will include all existing costs associated with planning, maintenance and implementation, as well as the cost of 2 mandatory checks – 6 months and 1 year after installation – to determine that any associated hard standing conforms as a minimum with the Town and Country Planning (General Permitted Development) (Amendment) (No. 2) (England) Order 2008. The upfront charge should also include a deposit sufficient to cover the costs of remedial action should this be necessary to render any installed hard standings compliant.
- g. The council should enforce against vehicles crossing the public footway where a VFC has been refused.
- h. The council should speed up the process for delivering disabled bays outside homes of disabled residents to respond to the need for adjacent parking.
- i. Explore becoming an early adopter of Pavement Channels to facilitate home charging of EVs parked on the kerbside and join a pilot if there is an opportunity to do so or if the government provides the appropriate assurances and planning guidance.
- j. Do everything possible in current and future legislation to prevent further loss of planting and permeability in front gardens and encourage depaving

RESPONSE TO RECOMMENDATION 13

1	<p>It is unlikely that a change to our Planning Policy will be approved to effectively prohibit vehicle accesses to private properties as legal advice declares this to be unlawful.</p> <p>Further legal advice was sought to determine if the council can amend its design standard to refuse a vehicle access if the private property is less than 6m deep. Following the advice and discussion with planning and the agreement by the Cabinet Member for Clean Air, Streets and Waste it is proposed to increase the minimum design standard to 6m. Highways and Planning are also looking at the possibility of introducing an Article 4 Planning Condition on all VFC.</p> <p>This final decision on the approach will be incorporated into the Householder Development SPD.</p>
RECOMMENDATION 13: PARTIALLY ACCEPTED	

COMMISSION'S RECOMMENDATION 14 TO CABINET	
1	<p>Make Southwark a pesticide free borough, to protect biodiversity and to protect our residents from the inherent harms of pesticides. Take a staged approach to eliminating pesticide use from our streets and estates, following on from the elimination of pesticide use from our parks several years ago.</p> <p>Priority Actions:</p> <ol style="list-style-type: none"> I. Draw upon the Pesticide Action Network's (PAN) Toolkit for Local Authorities to smooth this transition and, in particular, to understand the alternatives to pesticide use, the relative costs and the challenges. II. Consider replicating Lambeth Council's Community Weeding Scheme. III. To best understand and manage the challenges involved in this change of practice, including obtaining value for money and stakeholder buy in the Cabinet Member and officers should actively engage with counterparts in Lambeth and other councils that have already undertaken this change and gone pesticide free IV. Publicise to residents and landowners the reasons that Southwark is taking this approach, explaining the harms associated with the spraying of pesticides, and use this position to discourage residents and landowners from private use of pesticides.
RESPONSE TO RECOMMENDATION 14	
1	<p>Pesticide reduction is an objective in the Climate Action Plan; however, a council-wide pesticide reduction strategy has not yet been formally adopted.</p> <p>Pesticide use has been eliminated from our parks and open spaces, except for targeted use against invasive species, such as Japanese knotweed and giant hogweed, where an effective viable alternative for control is not available. Any proposed weed control methods in parks and open spaces are assessed by ecology officers for their environmental impact.</p> <p>The Waste and Cleaning service is responsible for providing weed management on the Council's public streets and housing estates, on behalf of</p>

<p>Highway and Housing services.</p> <p>The use of herbicide for control of vegetation growth for Housing and Highway services has been stopped for all 'green' assets, such as grass verges and communal green space (except for invasive species, such as Japanese knotweed and giant hogweed); and reduced from 2-3 times per year to 1 per year for all 'grey' assets, such as surfaced footways and hard standing. The Cleaning Service has undertaken trials of herbicide-free methods of control and found them to be mostly ineffective but also much more costly. There is evidence that local authorities that have previously gone herbicide-free have subsequently reverted to the use of glyphosate, with the reasons most likely being higher cost and lack of effectiveness.</p> <p>Until the integrated weed management planning work has been completed, it will not be feasible to determine whether, or not, the aim to eliminate the use of herbicide from the seasonal management of vegetation on Highway and Housing 'grey' assets can be fully achieved.</p>
RECOMMENDATION 14: PARTIALLY ACCEPTED

COMMISSION'S RECOMMENDATION 15 TO CABINET	
1	<p>Proactively encourage and enable the installation (including retrofitting) of well-designed, wildlife-friendly green roof systems on buildings and structures. Projects vary, but on average green roof systems have many of the ecological benefits of de-paving, at approximately half the cost per m2, sometimes less.</p> <p>Priority actions:</p> <ul style="list-style-type: none"> • Recognise the significant biodiversity benefits of well-designed green roofs can deliver, and particularly encourage their use through Planning in priority locations identified through the Green Infrastructure Strategy. • Promote the use of green roofs for agroecological urban farming.
RESPONSE TO RECOMMENDATION 15	
1	<p>Biodiverse green roofs are regularly secured by planning condition whenever appropriate. The details of the green roof must be approved as part of the condition. This includes the depth of substrate, species proposed and size of the roof.</p> <p>Green roofs are encouraged through the Urban Green Factor and biodiversity net gain. This is set out in Policy 59 Green Infrastructure and Policy P60 Biodiversity of the Southwark Plan. Best practice details are set out within the Climate and Environment SPD. Significant BNG is secured by s106 with non-significant elements secured by condition.</p> <p>Using green roofs for urban farming or food growing is possible on larger roofs where the site is accessible and has appropriate weight bearing load capacity is verified. This would often be a relationship between a commercial landowner and a social enterprise or growing enterprise. Officers are aware of roof garden projects in other parts of London which are funded by private businesses who own the building or funded by Business Improvement Districts. The scale to grow commercially on a rooftop and cost of setting up</p>

and running a project to make a profit does not currently exist in London. The Community Gardening team can hold information such as case studies and signpost/ link opportunities of land that they are made aware of, to experienced growers/ social enterprises/ commercial growing enterprises.

RECOMMENDATION 15: PARTIALLY ACCEPTED

COMMISSION'S RECOMMENDATION 16 TO CABINET

1 New trees should be considered as part of a larger habitat design and more priority given to their contribution to local ecology and the wider Ecological Network. Where possible, trees should be co-located with other trees and planting, in larger pits or schemes, and in conjunction with SuDs wherever possible.

Priority Actions

- Amend the existing criteria for choosing trees to include the following:
 - a. benefit to the wider ecology, with a preference for trees that feed pollinators, other invertebrates, and birds, and which takes account of the advantages of native trees to the ecosystem
 - b. placement within the wider Ecological Network, including wildlife corridors and proximity to SINC's (to be set out in the forthcoming Ecological Network/ Green Infrastructure Strategy and London LNRS)
- Planting should be in as large tree pits as possible within the constraints of the site, preferably with at least two trees to support a mosaic habitat designed to sustain the whole life cycle of insects. Where as possible, trees should be integrated with in SuDS.
- Encourage and support community trees groups such as Herne Hill Tree Watch and Trees for Bermondsey.

RESPONSE TO RECOMMENDATION 16

1 Where new and replacement tree planting takes place consideration is always given to providing larger tree pits, soil cells and integrating SuDS schemes. This is however influenced by existing immovable onsite constraints such as utilities, footway widths or buildings.

The existing criteria for tree selection is based on the suitability of the tree or trees for a given location based on the existing nursery stock type, eventual height, and spread and environmental tolerances such the ability to tolerate drought stress, paved areas, pollution and waterlogging, in addition to ecosystem services and disservices.

In addition to this we ensure that our planting programmes are diverse following the 10-20-30 rule (Santamour 1990) which prescribes that tree populations should not contain 10% of more than one species, 20% of more than one genus and 30% of more than one family to ensure future resilience.

All tree species both native and non-native support and are important for biodiversity

However, whilst native species such as Oak and willow support invertebrates in greater numbers than non-native trees, such species will not always be suitable for planting within urban areas due to water demand, spatial constraints and their ability tolerate harsh urban conditions.

Current climate change modelling by the Botanic Gardens Conservation International (BGCI) indicates several UK native species will not be viable due to climate change (Change Alliance of Botanic Gardens, 2025). Furthermore, promoting the concept of planting mostly native trees will lead to a lack of species diversity and put Southwark's urban forest against greater risk of mortality due to pests and pathogens.

It is therefore important that we avoid a one size fits all approach to tree species selection to ensure that the boroughs tree stock is resilient to climate change, in addition to pests and pathogens.

Further guidance documents and nationally recognised best practice on the subject of planting and species selection can be found here:

<https://cat.bgci.org/>
<https://www.forestresearch.gov.uk/publications/urban-tree-manual/>
<https://www.tdag.org.uk/tree-species-selection-for-green-infrastructure.html>
<https://www.tdag.org.uk/first-steps-in-urban-tree-canopy-cover.html>
<https://www.forestresearch.gov.uk/research/quantification-and-valuation-of-benefits-provided-by-urban-trees/selecting-urban-trees-for-ecosystem-service-provision/>
[londonurbanforestplan_final.pdf](#)
[London Urban Forest Resilience Project Report](#)

We work with, encourage, and support groups such as Herne Hill Tree Watch, Trees for Bermondsey, and numerous community groups to plant trees, hedging and orchards.

RECOMMENDATION 16: PARTIALLY ACCEPTED

COMMISSION'S RECOMMENDATION 17 TO CABINET

1 Mandate biodiverse-friendly planting and maintenance in all new schemes including pocket parks, larger park planting schemes and SuDS.

All new contracts approved through Trees, Housing, Parks, Planning or Highways should be chosen to explicitly enhance and maintain biodiversity

Priority Actions

- All planting must be managed to ensure:
 - That herbaceous planting is with wildlife-friendly species, with due consideration given to all phases of invertebrate lifecycles, and majority UK native,
 - that Trees are selected according to the amended biodiversity focused criteria (above)
 - resilience in case of drought and excess rainfall and the extremes of UK temperatures.
- Council officers including those managing Cleaning Greener Safer and Devolved Highway Budget projects should be made aware of these criteria.
- Where contractors/sub-contractors are responsible for the choice of plant

	<p>species, these criteria should be specified in contracts.</p> <ul style="list-style-type: none"> This is a useful resource https://www.lbp.org.uk/downloads/Publications/Management/making-contracts-work-for-wildlife.pdf
RESPONSE TO RECOMMENDATION 17	
1	<p>Ecology and Tree officers regularly support Highways, Housing and Project teams during the design and implementation of new planting schemes to ensure they consider biodiversity along with maintenance and environmental factors.</p> <p>It is not possible to limit tree selection to a majority UK native species as this would limit tree selection to that of 21 species many of which are not suitable for planting in urban areas and are not drought tolerant or resilient to climate change.</p> <p>Please refer to our response to recommendation 16 that provides a further justification on this subject.</p> <p>Contractors are not responsible for the selection of tree species; they are carefully selected by the council's team of qualified arboricultural officers.</p>
RECOMMENDATION 17: PARTIALLY ACCEPTED	

COMMISSION'S RECOMMENDATION 18 TO CABINET	
1	<p>Improve the active management of SINC's.</p> <p>Priority Actions:</p> <ul style="list-style-type: none"> Ensure the SINC and management plan for each habitat type is in place and well-communicated to all relevant staff. Explicitly include sections for biodiversity-appropriate first response to Anti-Social Behaviour (such as community policing, community engagement in activities such as litter picking, CCTV, fencing off sensitive habitat).
RESPONSE TO RECOMMENDATION 18	
1	<p>81% of Southwark's SINC's, and 96% of those managed by the Council, are currently in positive active management for nature, as per the Department for Environment Food and Rural Affairs (Defra)'s Single Data List (SDL) 160 statistic.</p> <p>Officers regularly write, update, or commission habitat management plans, which include provisions around anti-social behaviour (ASB) when relevant. ASB concerns must be coordinated with community safety and cleaning teams.</p> <p>Officers regularly provide maintenance advice to other teams or residents on how to manage ecological assets.</p> <p>Improving our equipment to aid with proper ecological management is something we can explore, following on from the purchase of two cut-and-collect mowers using a ReWild London grant to aid with meadow management.</p>

Ecological management will be a consideration in the development of any future grounds maintenance contracts.

The borough ecology survey and SINC Review currently underway will involve reviewing existing SINC sites, mapping their habitats and providing recommendations on their future management.

RECOMMENDATION 18: ACCEPTED

COMMISSION'S RECOMMENDATION 19 TO CABINET

- 1 **Conduct systematic and periodic ecological audits of our parks, estates, verges pockets of land and SINCS, using targeted trial applications of AI-based bioacoustic monitoring devices. Use the information collected to develop more targeted biodiversity protection and support practices and policies.**

RESPONSE TO RECOMMENDATION 19

- 1 The council continuously strives to improve our biodiversity monitoring, to ensure there is proper evidence to support decision making around ecology. Wherever possible we support residents and organisations to monitor nature across the borough. Officers have recently been allocated council funding to build recording capacity and skills amongst residents through training and activities. This builds on our network of citizen scientists and third-sector partners who conduct regular biodiversity monitoring of birds, bats, plants, fungi, butterflies, and more, often supported by specialist organisations such as Butterfly Conservation, London Bat Group, and the South London Botanical Institute.

The council collaborates or facilitates, where appropriate, academics conducting biodiversity research in Southwark, including, recently from University College London, the Royal Botanic Gardens Kew, and the Institute of Zoology.

Conducting regular surveys, carrying out scientific analyses, or adopting new sensor technology (e.g. AI-based bioacoustic monitors) carries significant resource costs, and often requires specialist facilities and expertise. Any new monitoring technology would need to be subject to a cost-benefit analysis to ensure that information produced is useful for advancing the Council's policies for biodiversity.

The council is committed to developing this area of work but needs to address the issue of finding additional resource to do it.

RECOMMENDATION 19: PARTIALLY ACCEPTED

COMMISSION'S RECOMMENDATION 20 TO CABINET

- 2 **Increase blue habitat, especially in areas where there are gaps by:**
 - i. **expanding the areas of marginal habitat around the borough's**

	<p>rivers and ponds.</p> <p>ii. increasing the number of ponds and wetlands, including temporary ponds.</p> <p>Priority Actions:</p> <ul style="list-style-type: none"> • Explore whether and how existing underground rivers could be used in some areas of the borough to achieve this ambition. • Create River Basin Management Plans for the catchments of the Rivers Peck and Neckinger, including Earl's Sluice.
RESPONSE TO RECOMMENDATION 20	
2	<p>We strive to expand wetland habitat and building ponds wherever possible. However, any new freshwater habitats must consider long term sustainability, for example ensuring ponds aren't reliant on mains water connections, and management plans are in place. We are project partners on Froglife's 'London Blue Chain' project, which are supporting several new pond builds or restorations in Southwark. We are working on a management plan for Burgess Park's lake to guide the expansion and management of the marginal reedbeds, supporting the addition of floating planters in Greenland Dock, and the management of Albion Channel's freshwater habitats. New measures are being implemented in Peckham Rye Park and Southwark Park to improve water quality and the condition of the riparian zone.</p> <p>However, the creation of River Basin Management Plans is the responsibility of the Environment Agency as per the Water Framework Directive. The above ground sections of the Neckinger and Earl's Sluice are now limited to outlets into the Thames, and their formal management is the responsibility of the Port of London Authority, Environment Agency, and Thames Water.</p> <p>This is detailed within the Natural England Green Infrastructure Planning and Design Guide.</p> <p>These documents will inform the evidence base documents that will be used to inform the development of policy around water bodies and water habitat in the review of the Southwark Plan.</p> <p>A 170m bridge across Canada Water was opened in November 2024, bringing residents closer to the restored area of wetland.</p>
RECOMMENDATION 20: PARTIALLY ACCEPTED	

COMMISSION'S RECOMMENDATION 21 TO CABINET	
2	<p>Southwark should pursue the Water Framework Directive "Good Ecological Status" for all remaining above ground waterways, such as the Peck.</p>
RESPONSE TO RECOMMENDATION 21	
2	<p>None of the above or below ground waterways in Southwark (excluding the Thames) – Peck, Effra, Neckinger, Earl's Sluice – are currently assessed by Environment Agency as per the Water Framework Directive, and do not have River Basin Management Plans, which are the responsibility of the</p>

	<p>Environment Agency (EA) to produce and review.</p> <p>Officers supported recent flood alleviation works in Peckham Rye Park and Common which expand the potential of the, largely underground, River Peck to deliver for biodiversity. Further improvements to the surrounding riparian habitat of the above-ground sections of the Peck are planned.</p>
RECOMMENDATION 21: PARTIALLY ACCEPTED	

COMMISSION'S RECOMMENDATION 22 TO CABINET	
2	<p>Provide, recognise, and protect routes for use by wildlife only, as well as for use for active travel, with reference to the work Southwark Nature Action Volunteers (SNAV) have done on wildlife corridors for nature and people, as part of the broader piece of work on Ecological Networks.</p>
RESPONSE TO RECOMMENDATION 22	
2	<p>Taking account of ecological connectivity is a priority for several council policies, including the Southwark Plan and Climate Change Action Plan. The council will endeavour to support projects that are in strategic locations for habitat networks.</p> <p>Many green corridors both for wildlife and active travel are already protected within the SINC system, for example, Surrey Canal Walk, Sydenham Hill Railway Cuttings, Deal Porters Walk, and Nunhead Railway Embankments.</p> <p>We are working towards reviewing our SINCS and other habitat opportunities across the borough through our current borough-wide ecological survey. Our work with the GLA to develop the London Local Nature Recovery Strategy (LNRS) will also contribute towards this recommendation, through identifying opportunity areas for biodiversity recovery, including green corridors.</p> <p>Through the 'Streets for Nature' component, Streets for People builds connections between the green infrastructure and the built environment.</p> <p>Enhancing connectivity by walking and cycling aims to improve access to these sites and public enjoyment of them. As a result, creating additional demand for existing sites and the value added through them for biodiversity and the natural amenity.</p> <p>Sites and routes for wildlife only will be dealt with by the London Plan Local Nature Recovery Strategy, Green Infrastructure framework, updated SNAP and SINC review.</p> <p>These evidence base documents will be used to inform the development of policy around greening and wildlife habitat in the review of the Southwark Plan.</p>
RECOMMENDATION 22: PARTIALLY ACCEPTED	

COMMISSION'S RECOMMENDATION 23 TO CABINET

- 2 **Southwark should work with the GLA to adopt clearer definitions and requirements for nature-friendly "green" corridors, for example including guidelines for minimum widths, sizes, spacing, target species, and types of soil and planting.**

Priority Actions:

- Consultation must first take place with Planning and Ecology Officers and the Southwark Biodiversity Partnership.

RESPONSE TO RECOMMENDATION 23

- 2 Defining ideal requirements for ecological connectivity is something that can be considered within our next biodiversity strategy (next iteration of the SNAP), following the LNRS produced by the GLA. The Southwark Biodiversity Partnership will be a key consultee on this strategy.

However, the complexities of the urban environment in terms of land use and ownership, infrastructure and services mean adopting explicit minimum requirements for nature corridors could restrict our ability to deliver projects for nature recovery. We strive to support innovative projects that promote ecological connectivity through the urban environment where the creation of linear green spaces is not possible. For example, the creation of 'stepping stone' wildlife corridors, such as the North Bermondsey Wildlife Corridor and the Camberwell Wildlife Corridor.

The Planning Policy team are actively engaging with the GLA at consultation events on the planning policy open scoping sessions, Green Infrastructure Framework and the Local Nature Recovery Strategy (LNRS). The planning policy team will continue to respond to relevant consultations to gain clarity on definitions, guidelines and requirements for green corridors.

Green corridors will be highlighted as areas for biodiversity potential in the LNRS. Further work will be commenced on identifying and managing green corridors in the borough through the Green Infrastructure framework, updated SNAP and SINC review.

These evidence base documents will be used to inform the development of policy around greening in the review of the Southwark Plan.

RECOMMENDATION 23: PARTIALLY ACCEPTED

COMMISSION'S RECOMMENDATION 24 TO CABINET

- 2 **Encourage, enable and support community and volunteer management of nature, wherever there is interest. As well as reducing costs, this will increase social benefit, educate and enhance the sustainability of wildlife friendly habitat.**

Priority actions:

- Encourage, define and develop Public-Common Partnerships, as suggested in the Southwark Land Commission Report, where local

	community organisations share responsibility for land management with Southwark as the landowner
RESPONSE TO RECOMMENDATION 24	
2	<p>We strongly encourage community stewardship of green spaces, and support third sector partners wherever possible to facilitate this.</p> <p>For example, leases or management agreements are in place from large sites such as Sydenham Hill Woods to small sites such as Bellenden Road Nature Reserve, or areas within parks, such as in Shuttleworth Park.</p> <p>We strive to identify and build new partnerships to support positive environmental management of our green spaces, while ensuring that third sector partners and community organisations are supported to maintain sites sustainably for the long term.</p>
RECOMMENDATION 24: ACCEPTED	

COMMISSION'S RECOMMENDATION 25 TO CABINET	
2	<p>Develop a training programme on biodiversity and wildlife friendly management of green and blue space, targeted at officers and contractors across all relevant roles and grades, suited to their job roles.</p> <p>This should be an integral part of the staff training already required to ensure that all areas of council policy are seen through the prism of the Climate Emergency and extended to include the Biodiversity Emergency.</p> <p>Priority Actions:</p> <ul style="list-style-type: none"> • Ensure that all teams, including Planning, Climate Change, Sustainable Growth, Parks, Housing, Flood Management, Highways, Air Quality and other departments are aware of our ambitions to address the Biodiversity Emergency • Ecology officers to support / collaborate in developing cross council positive biodiversity training. • The training ought to be developed for: <ol style="list-style-type: none"> 1. Managers and leaders 2. Staff managing delivery of projects under the Cleaner Greener Safer and Devolved Highways Budget funding streams, 3. Operational staff including: <ul style="list-style-type: none"> ○ Grounds maintenance team ○ Cleaning team ○ Supervisory staff • The training must ensure proper management and that wildlife friendly practices are embedded into operations. • Training should be repeated at regular intervals for existing staff and embedded in any induction training for new staff. • Contractors and sub-contractors should be obliged to adopt the same commitments to biodiversity across their areas of responsibility, including in respect of training their staff.

RESPONSE TO RECOMMENDATION 25

2 The Climate Change Team is currently developing a staff climate training programme and intranet hub, and biodiversity will be included as part of this programme.

Ecology officers could, provided additional capacity and resource is made available, support with the development of this training.

Within parks, greater provision for ecological training for grounds maintenance staff can be considered as part of any future grounds maintenance contracts. Regular on-the-job training is provided to grounds maintenance staff and contractors by Ecology, Tree, and Parks Operations officers on how to maintain biodiversity assets to a high standard.

The complex interface of green/blue infrastructure and the built environment is a key component of the work that Highways services delivers, recognising the public demand for these features and access to them.

Ensuring additional training and support is available to take full advantage of the opportunities available will be undertaken to make sure the different priorities for public space can be balanced.

The council is committed to developing this area of work but needs to address the issue of finding additional resource to do it.

RECOMMENDATION 25: ACCEPTED**COMMISSION'S RECOMMENDATION 26 TO CABINET**

2 **Proactively promote Southwark's ambition to address the biodiversity emergency and explain steps that the council is taking and plans to take to achieve that end. This will include information explaining decisions taken in response to the recommendations contained in this document, such going pesticide free and other changes in management of green and blue spaces across the borough.**

Develop a programme to engage residents in the appreciation of and connection to nature.

Priority Actions

Use social media and publications such as Southwark Life to explain highlight our ambitions and paths to achieving them. These should include recommendations as to how residents, schools, places of worship and other stakeholders can help to protect and improve biodiversity in their own gardens and local green spaces.

Facilitate an exhibition in the Tooley Street Atrium of Insectinside.me and encourage links to Southwark schools.

Consider developing livestream wildlife webcams to increase resident involvement in and awareness of Southwark's wildlife.

RESPONSE TO RECOMMENDATION 26

2 We strive to promote our legacy of action for biodiversity, our current projects for nature recovery, and ambitions for the future with the public, as well as support residents to get involved with nature recovery through comms.

The Community Gardening team sends out a quarterly e-newsletter and runs a Southwark Community Gardening Instagram account highlighting projects and relevant educational and biodiversity topics from Southwark and wider.

The Climate Change Team supports this through a dedicated comms support and through an annual climate report.

We are working with the council's comms team to develop a biodiversity comms plan across multiple communication platforms and styles to reach a broad audience, including social media, print media such as Southwark Life, the council website's ecology pages and in-person activities. This could involve novel methods such as an exhibition in the Tooley Street Atrium or the use of wildlife livestreams, in collaboration with external third-sector or community organisations and residents.

While the council is committed to developing this area of work, this will be subject to finding the necessary resource and agreement against other comms priorities within the council.

RECOMMENDATION 26: ACCEPTED**COMMISSION'S RECOMMENDATION 27 TO CABINET**

2 **Actively promote wildlife gardening to residents.**

Priority actions

- Promote water butts to households including as recommended above.
- Deliver this in partnership with the Centre for Wildlife Gardening and other members of Southwark Biodiversity Partnership.

RESPONSE TO RECOMMENDATION 27

2 Community Gardening officers share this through their interaction with individual groups signposting to offers and guidance from other organisations. Also, through their communications channels and the two Southwark Community Gardening networking events they organise each year. Officers regularly link estate community gardens to conservation organisations, such as Froglife and Butterfly Conservation, for collaborations where funding, expertise and training can be delivered by these organisations on site particularly at estate community gardens.

We maintain guidance on ecologically friendly activities on the Council's website:

https://www.southwark.gov.uk/sites/default/files/2024-10/guidance_on_creating_habitat_and_biodiversity_features_for_parks_and_open_spaces.pdf

As per our response to recommendation 27, we are working with the comms

and web team to promote to residents how they can get involved with nature recovery in Southwark, through the development of a dedicated biodiversity comms plan. However, this is subject to the council finding the necessary resource, and agreement against other comms priorities.

RECOMMENDATION 27: ACCEPTED

COMMISSION'S RECOMMENDATION 28 TO CABINET

- 2 **Develop ambitious cross borough Ecological Networks and particularly consider the ecological and social potential of daylighting more of Southwark's Rivers (e.g. the River Peck in Peckham Rye Park and River Effra in the south of the borough) and increasing marginal habitat.**

RESPONSE TO RECOMMENDATION 28

- 2 Officers regularly network with officers from other Boroughs, through the London Borough Biodiversity Forum and London Tree Officers Association.

The production of the London Local Nature Recovery Strategy by the GLA, on which Southwark is a consultee, is defining a pan-London ecological network and promoting cross-borough approaches to biodiversity enhancement.

We are not currently considering 'daylighting' any further sections of Southwark's culverted rivers. There are major logistical and environmental challenges with bringing underground segments of rivers aboveground in areas that have been built up, in cases for centuries, and integrated with the sewer system. Responsibility for culverted waterways is divided between the council, Environment Agency and Thames Water.

Further improvements are planned to the surrounding riparian habitat of the above-ground sections of the Peck and nearby areas of the Effra in Peckham Rye Park and Belair Park, respectively.

RECOMMENDATION 28: PARTIALLY ACCEPTED

COMMISSION'S RECOMMENDATION 29 TO CABINET

- 2 **Make Southwark a "Right to Grow" borough, taking a motion to Southwark Council Assembly adopting 'The Right to Grow'.**

Priority actions

- A 'The Right to Grow' motion along the lines below would be appropriate:
- This Council notes:
 - that the cost-of-living crisis and the continued efforts to recover from the pandemic bring a new focus on ensuring that residents have access to enough fresh food for day to day living.
 - The increasing need to put the health and well-being of residents at the heart of our corporate strategies.
 - The powerful evidence which demonstrates the link between people's

	<p>health and wellbeing and the availability of fresh locally produced food.</p> <ul style="list-style-type: none"> ○ That the cost-of-living crisis is creating real hunger, reinforcing the need for healthy fresh food at an affordable price. ○ That communities coming together to grow food can radically reduce costs to NHS and social care budgets by reducing loneliness and providing healthy food. ○ That there is plenty of under used publicly owned land which could be used for community food growing while also improving the public realm. <ul style="list-style-type: none"> • This Council agrees (or to the extent that the below concern executive functions, recommends to the executive) to adopt a Right to Grow on council owned land which is suitable for cultivation. • As a result, this Council will: <ul style="list-style-type: none"> ○ Identify and produce a map of all council owned land suitable for community cultivation. ○ Make this land available for cultivation by a simple licence to community organisations at no cost. ○ Consider community food growing on sites awaiting development for other uses on a fixed term basis. ○ Write to Southwark's MPs and ask them to support the Incredible Edible campaign and national right to grow. • In addition, the Council will work with partners through the Land for Good delivery process and encourage anchor institutions and civil society to join the council in the above endeavour.
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RESPONSE TO RECOMMENDATION 29

2 This recommendation has now been passed at Council Assembly and by Cabinet.

Officers support this recommendation but note that further resources are needed to deliver more.

This would build on the work the Community Gardening service has delivered since 2020 with the launch of the Allotment Expansion Guarantee (AEG). 23 new gardens with 256 growing plots have been set up on Southwark housing estates to date, more in progress.

The Community Gardening team support residents and groups to set up new growing spaces on housing land. They have developed a clear process from checks for site suitability, support for group development, agreements that groups manage and maintain the spaces, consultation, agreements with the landowner, collaboration with other council teams, training and the groups becoming part of a Southwark growing network which is mapped.

The Community Gardening service collaborate with other teams including Properties, Parks and the Ecology service to support stewardship of available (non-housing) land from groups or organisations carrying out food growing activities.

The current capacity of the team would not be able to comprehensively map all prospective land suitable for growing. Possibly this could be resourced as a desktop exercise or ad hoc opportunities identified at different times. The

priority remains on supporting resident led projects to ensure sustainability and need, so being led by where people are who want to run these projects.

RECOMMENDATION 29: ACCEPTED

COMMISSION'S RECOMMENDATION 30 TO CABINET

3 Map food growing plots

Priority actions:

- Undertake this mapping as part of a larger piece of engagement work with community stakeholders to release more land for community good (see recommendation 10).
- If there is insufficient capacity within the council to carry out this task, mapping will need to be commissioned externally.
- Include as a minimum a public facing element that helps residents to discover ownership of land that could be used to grow food and also invites local landowners to submit potential food growing plots for community use under license, preferably for a minimum period of 5 years (although consideration could be given to shorter terms in some circumstances).

RESPONSE TO RECOMMENDATION 30

3 The Community Gardening service maps existing gardens rather than potential gardens. Currently they assist enquiries from residents about particular pieces of land – to help identify the landowner. Occasionally they are made aware of existing community gardens or nature gardens which become available as a group no longer has capacity to look after it.

Following our response to recommendation 29, the council is committed to developing this area of work but needs to address the issue of finding additional resource to do it.

RECOMMENDATION 30: PARTIALLY ACCEPTED

COMMISSION'S RECOMMENDATION 31 TO CABINET

3 **Update the SNAP to include a community garden plan, which includes the right for residents to have a garden, orchard, or food growing plots on their estate. Include details on how Southwark can support urban agriculture to increase biodiversity.**

RESPONSE TO RECOMMENDATION 31

3 Work is underway to review and then update the SNAP with a new biodiversity action plan, following the publication of the London Local Nature Recovery Strategy (LNRS), which will guide the structure of the Council's biodiversity strategies. Close working between ecology officers and the community gardening team means that community food growing and gardening, as a link to access to nature and a form of habitat creation, is likely to have a larger

profile.

However, a community gardening policy might benefit from being a standalone document, rather than form part of the SNAP. Biodiversity Action Plans are focused on habitats, species, and access to nature, following the 'UK Biodiversity Framework'. This could result in biodiversity overshadowing the other benefits of community gardens, such as for health and wellbeing, or aspects of community gardening governance and management, unrelated to nature recovery, overshadowing biodiversity actions.

The council is committed to considering the idea of a Community Gardening strategy/plan, independently to the biodiversity strategy, subject to addressing additional resource needs, as discussed in the response to recommendation 32.

RECOMMENDATION 31: PARTIALLY ACCEPTED

COMMISSION'S RECOMMENDATION 32 TO CABINET

3 Develop a Community Gardening / urban food growing policy and include links to creating local markets and the planning system.

Priority actions

- Create a cross service working group to bring this forward consisting of Community Gardening Coordinators, Planning Policy, Regeneration, Public Health, Climate Change and Ecology teams.
- As part of this:
 - Create new urban farming and community food growing zones alongside new developments (roof tops, schools and new parks and green land). Old Kent Road would be a good test site for an integrated and inclusive food growing system.
 - Include a Food Growing Policy in the next update of the Southwark Plan (and /or Environment & Climate SPD) that requires developers to include spaces for urban agriculture, allotments and community gardening.
 - Support local market initiatives, such as cooperative grocery stores, farmers' markets and other community hubs, in collaboration with food growing projects in the area and initiatives such as the Walworth Neighbourhood Food Model.
 - Undertake to support Agroecology through all urban agriculture initiatives

RESPONSE TO RECOMMENDATION 32

3 The Community Gardening team have developed an action plan for supporting community gardening/ food growing which is updated annually. There is significant potential for a cross-team working group to develop this, with the Community Gardening service able to advise and provide best practise/case-study examples.

While, the council is committed to developing this area of work, this is subject to finding required additional resource needs and addressing capacity requirements.

	The Climate and Environment SPD has been revised to include a section on food growing spaces within development. Best practice on this will also be reviewed as part of the Southwark Plan review.
RECOMMENDATION 32: ACCEPTED	

COMMISSION'S RECOMMENDATION 33 TO CABINET	
3	Undertake to support Agroecology through food procurement.
RESPONSE TO RECOMMENDATION 33	
3	<p>The Southwark Sustainable Food Strategy (2023-2026) outlines the vision for a sustainable food system in Southwark. This strategy includes the key aim to promote and provide planet-healthy diets https://www.southwarkfoodactionalliance.co.uk/wp-content/uploads/2023/09/Good-Food-Southwark-Sustainable-Food-Strategy-2023-26.pdf</p> <p>The Southwark School Food Transformation Programme supports sustainable food procurement, with goals to reduce meat consumption and increase plant-based food consumption in schools, support more local food producers and food businesses, reduce school food waste and source more higher welfare food by using suppliers who have a Food for Life Bronze catering accreditation, which also considers sustainability.</p> <p>Local food is defined as food that is grown, raised, or produced within a 30-mile radius from the borough's boundaries. For essential products that cannot be sourced within this radius, such as fresh fish, the definition is extended to include producers within a 100-mile radius. Local food businesses are suppliers located in Southwark and/or within a 30-mile radius from the borough's boundaries.</p> <p>While the council is committed to exploring further avenues of sustainable food procurement including for example through agro-ecology, this is subject to finding required additional resource needs and addressing capacity requirements.</p>
RECOMMENDATION 33: PARTIALLY ACCEPTED	

COMMISSION'S RECOMMENDATION 34 TO CABINET	
3	Work with the Capital Growth network to monitor and measure how food growing projects in Southwark are improving biodiversity and helping to tackle the ecological emergency.
RESPONSE TO RECOMMENDATION 34	
3	Officers are already working with Capital Growth to develop new methods to measure and improve biodiversity on food growing sites.

RECOMMENDATION 34: ACCEPTED

Policy framework implications

14. The protection and enhancement of biodiversity is a corporate responsibility that cuts across all council departments and functions, as required of the Biodiversity Duty on local authorities, and strengthened by the Environment Act, 2021. Meeting the recommendations accepted or partially accepted by this report will contribute towards our requirements of the Duty. However, action taken to conserve and enhance biodiversity itself contributes to a range of council, regional and national policies and targets.
15. Meeting the recommendations accepted or partially accepted by this report directly contributes to the Southwark 2030 commitment to a “Healthy Environment”, the Climate Change Strategy (2021) and Action Plan (updated annually) commitments to a “Thriving Natural Environment”, and the Climate Resilience and Adaptation Strategy (2024), the Streets for People 2023-2030 ‘Streets for Nature’ theme, and the Southwark Plan 2019-2036 (2022) policies: P57 Open Space, P58 Open water space, P59 Green Infrastructure, P60 Biodiversity and P61 Trees. Action taken for biodiversity additionally contributes to other key council plans and strategies, including the Cultural strategy (2017), Local Flood Risk Management Strategy (2024), Air Quality Strategy and Action Plan (2017), Tree Management Policy (2020), Southwark Land Commission (2023) and Southwark Food Security Action Plan (2019),
16. Action for biodiversity contributes to the London Environment Strategy., the London Plan “Green Infrastructure and Natural Environment” and “Sustainable Infrastructure” policies, and the relevant priorities for Southwark within the upcoming London Local Nature Recovery Strategy (LNRS), currently under production by the GLA.

Community, equalities (including socio-economic) and health impact statement:

17. Accepting the recommendations as per this report will have a positive impact on communities in Southwark. Actions for the conservation and promotion of biodiversity promote community cohesion by connecting people with nature, providing volunteering opportunities, and fostering positive interactions between people from different communities. Much of the wildlife assets of Southwark are in parks and public spaces, free to all users, and accessible year-round.
18. Volunteering is vital in the action taken for biodiversity protection and enhancement in the borough. Southwark has developed or supports a huge range of regular volunteering opportunities and will continue to promote volunteering in our open spaces. This includes opportunities with schools, people with disabilities, and underrepresented groups.
19. Accepting the recommendations as per this report will have no detrimental impact to any group or protected characteristic as outlined in the Equalities Act 2010 or the Public Sector Equality duty (PSED) and align with a just transition for our residents in tackling the climate emergency.

20. Many activities to conserve and enhance biodiversity provide novel opportunities for participation with physical activity for members of the public, increasing representation in outdoor activities and promoting resident health and wellbeing. Access to nature is well documented as beneficial to both mental and physical health.
21. Biodiversity directly benefits the health of residents through improving air quality, reducing urban temperatures, reducing noise and calming traffic, managing flood risks, and providing amenity value, recreation space and cultural services.

Climate change implications

22. Conserving and enhancing biodiversity can reduce emissions and mitigate against the impacts of climate change. For example, trees both sequester carbon and provide shade.
23. Accepting the recommendations as per this report will directly contribute to the Council's Climate Change Strategy and Action Plan, which commits to a 'Thriving Natural Environment' and an adapted, resilient borough. These commitments include improving biodiversity, introducing new green corridors, making our streets a green place to walk, play and relax and increasing tree canopy cover across the borough. The Action Plan for the strategy includes 14 SMART actions for the 'Thriving Natural Environment' priority area.
24. A £1m allocation for capital projects for green space enhancements and biodiversity improvements was agreed in 2022 in response to Climate Change Citizen Jury recommendations, which will contribute to both climate change and biodiversity objectives.
25. The council's Climate Resilience and Adaptation Strategy, adopted at cabinet in February 2024, defines the council's approach to responding to the harmful effects of a changing climate. Actions resulting from the delivery of the strategy will offer opportunities for biodiversity improvements through new green infrastructure and sustainable urban drainage to tackle flooding and overheating.

Financial and resource implications

26. The costs connected with meeting the recommendations accepted within this report will be contained within existing revenue and capital budgets relating to existing biodiversity actions and management within the council.
27. Should the implementation of any activities or recommendations outlined in this report require additional funds in future these will be subject to further decision reports setting out the cost and funding mechanisms.

Legal implications

28. There are specific legal implications arising from this report.

Consultation

29. Should the implementation of any activities or recommendations outlined in this report require consultation in future these will be subject to further decision making.
30. Consultation on biodiversity-related projects in the public realm is regularly and extensively carried out with internal departments, external groups, residents, organisations and other users of public spaces

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Head of Procurement

31. There are no material procurement implications associated, notwithstanding the content of recommendation 33 (partially accepted). The report is otherwise consistent with the council's Fairer Future Procurement Framework as relevant to the subject matter.

Assistant Chief Executive, Governance and Assurance (SB140525)

32. This report seeks Cabinet's approval of the council's response to the 34 recommendations put forward by the Environment Scrutiny Commission's Biodiversity Review, including acceptance of ten recommendations and partial acceptance of 24 recommendations.
33. There are no significant legal implications arising from the recommendations in this report and the proposal to approve the Commission's recommendations is consistent with the council's statutory duty to protect and enhance biodiversity for both nature and the residents of the borough.
34. When considering this report, Cabinet must take account of the Public Sector Equality Duty imposed by section 149 of the Equality Act 2010 which requires the council to have due regard to the needs of those individuals and groups having a protected characteristic under the Act. As noted in the community, equalities and health impact statements the recommendations of this report will have a positive impact on communities and no adverse effects on those with a protected characteristic are anticipated.
35. This report is being considered by Cabinet in line with the requirement contained in paragraph 15.3 of the Overview and Scrutiny Procedure Rules contained within the council Constitution.

Strategic Director, Resources (FC25/001)

36. This report is requesting the Cabinet to approve this report as the Council's response to the 34 recommendations put forward by the Environment Scrutiny Commission's Biodiversity Review, as set out in the Overview and Scrutiny Procedure rule 15.3 and to accept 10 recommendations and partially accept 24 recommendations, for reasons outlined in this report.
37. The strategic director of resources notes that costs connected with meeting the recommendations accepted within this report will be contained within

existing revenue and capital budgets relating to existing biodiversity actions and management within the council and notes that if the implementation of any activities or recommendations outlined in this report require additional funds in future these will be subject to further decision reports setting out the cost and funding mechanisms, as mentioned in the financial and resource implications.

38. Staffing or any costs connected with these recommendations will be contained in the existing departmental revenue budgets.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Cabinet Report: "Report of the Environment Scrutiny Commission: Biodiversity scrutiny review"	Cabinet Office 160 Tooley Street London SE1 2QH	Julie Timbrell 020 7525 0514
Environment Scrutiny Commission agenda and papers 2022/23/24	Scrutiny Team 160 Tooley Street London SE1 2QH	Julie Timbrell 020 7525 0514

APPENDICES

No.	Title
Appendix 1	Biodiversity scrutiny review report (ESC, Nov. 2024)
Appendix 2	Biodiversity scrutiny review report recommendations (ESC, Nov. 2024)

AUDIT TRAIL

Cabinet Member	Councillor Portia Mwangangye, Leisure, Parks and Young People		
Lead Officer	Tara Quinn, Head of Parks and Natural Environment		
Report Author	Liam Nash, Ecology Officer		
Version	Final		
Dated	5 June 2025		
Key Decision?	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments Sought	Comments Included	
Assistant Chief Executive, Governance and Assurance	Yes	Yes	
Strategic Director, Resources	Yes	Yes	
Head of Procurement	Yes	Yes	
Cabinet Member	Yes	Yes	
Date final report sent to Constitutional Team		5 June 2025	

Environment, Community Safety and Engagement Scrutiny Commission

MUNICIPAL YEAR 2025-26

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