

# Planning and Environment Review Report

**Environment Scrutiny Commission**

**July 2021**

**APPENDIX A**

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## Executive Summary

The report summarises the commission's investigation into Southwark's built environment to improve the quality of its environmental policies in development as well as its performance against current planning policy objectives with respect regard to the environment. We observed that in order to positively impact on Southwark's built environment and address the Climate Emergency, that the council reduce embodied carbon over time as well as improving the environmental impact of schemes over the whole lifecycle of a building. We found the need for this to be done through ambitious action being taken by the council to reduce carbon, pollutants, safeguarding scarce resources and improving biodiversity in the context of planning.

# Summary of Recommendations

## Recommendation One

Ensure the NSP and associated planning documents accord with the Climate Strategy by December 2021, by having polices in place that:

- Meet Net Zero carbon by 2030
- Devise targets on embodied carbon in construction to meet net zero targets in developments
- Increase the number and quality of trees in the borough
- Support provision for food growing spaces and distribution
- Increase green space and green corridors across the borough
- Priorities air quality improvement actions that also have a carbon reduction benefit
- Support active travel (walking, cycling and public transport) and reduce reliance on private travel by motor vehicle

## Recommendation Two

A completion certificate ought to be required with Building Control issuing this, coordinated with Planning, and this ought to ensure that the environmental standards set out in the planning application are met.

## Recommendation Three

Encourage all developments to contribute to the development of Decentralised Energy (DE) networks, including by connecting to them where there is one in proximity to the development, alongside mandatory requirements for significant developments.

## Recommendation Four

Establish a policy and agreed process for allocating the Carbon Offset Fund to projects at pace, and in line with the Carbon Emergency, and by December 2021 at the latest.

## Recommendation Five

Planning adopt the Energy Hierarchy (retain, refurbish, reuse/ reclaim, remanufacture, recycle) in the New Southwark Plan for both development and our own council house building programme.

## Recommendation Six

That greater scope is given in NSP site descriptions to the re-use of existing buildings and that support is given to retention, refurbishing and repurposing of

**existing buildings and increasing the density of development on the site without a default to demolition of all existing buildings.**

### **Recommendation Seven**

**Develop the public realm to enable active travel and support the local economy including cycle routes, walking routes and pedestrianisation, through amendments to planning policies.**

### **Recommendation Eight**

**Use a matrix to promote a mix of amenity provision in local neighborhoods, and judge the capacity of schemes to contribute to a strong local economy, and increases to social and natural capital.**

## Introduction

This review was conducted in a shorter than normal administrative year by the Environment Scrutiny Commission. The review picks up from work of last year's Commission, which looked at the Climate Emergency more broadly and identified planning as a key lever in meeting the council's aim of reaching net zero by 2030.

At a macro level, Planning sets the policy framework for the borough, affecting broadly on our transport, energy, natural and built environment; all key to reducing carbon over time, and preserving our ecological integrity. At a micro level, the planning service and building control functions govern and enforce the amount of carbon a new building can emit and work to ensure it is built to high environmental standards.

## Review Aims

The review seeks to principally influence Southwark's planning service in order to improve the quality of Southwark's environmental policies in development; performance against current planning policy objectives; and delivery of the planning service.

The overriding aim of the review is to positively impact on Southwark's built environment and address the Climate Emergency, with specific reference to reducing carbon, pollutants, safeguarding scarce resources and improving biodiversity.

## Evidence received

- i. Planning Officers
- ii. Ann Griffin, a member of Southwark's Design Review Panel, Director of Architects Collaborative and Mina Hasman , Skidmore, Owings & Merrill, who is group lead for the Cross-Industry Action Group, who instigated the Climate Framework. Mina is also on the board of UK Green Building Council.
- iii. Southwark Planning Network, with Paula Orr and Richard Lee.



# Themes

## Align Planning Policy with Climate Emergency Strategy

Southwark Planning Network commended the ambition of the draft Climate Emergency strategy but raised concerns that the Council has not yet brought forward alterations to the proposed New Southwark Plan (NSP) that address significant changes required by the draft Climate Emergency Strategy to meet net zero by 2030. These are:

- Enforcing targets on embodied carbon from construction to meet net zero
- Increasing the number and quality of trees in the borough
- Provision for food growing spaces and distribution
- Increasing green space and green corridors across the borough
- Prioritizing air quality improvement actions that also have a carbon reduction benefit.
- Near zero car parking in new developments.

The architects the commission took evidence from also supported the ambition of the council's Climate Emergency work and stressed the importance of finding ways of integrating documents and approaches to meeting the Climate Emergency. Ann Griffin, Director of Architects Collaborative, highlighted how a range of inconsistent and misaligned regulatory functions and policies, which are working to different standards, make it more difficult to set coherent environmental standards.

They also highlighted the importance of reducing embodied carbon over time, and that as efficiency improves this will become more important. They emphasised the importance of requiring developers to tackle the carbon created in construction and through life cycle of the building, not just carbon emitted once the building is complete.

Officers outlined how the New Southwark Plan (NSP) was developed as the council was growing in awareness of the Climate Emergency, which was then declared in 2019. Once the NSP is agreed then the plan is to do a review to catch up to the Climate Emergency strategy. For example, the NSP contains an energy policy that is aimed at zero carbon by 2050. Officers are intending to update this Energy policy with one that will deliver zero carbon by 2030.

The NSP is presently going through an examination in public. The examination in public commenced with the publication of the plan early 2020. Following feedback from inspectors, an updated version was consulted on in the autumn 2020, with hearings in public happening now, spring 2021.

Planning officers also intend to develop several supplemental environmental policies once the NSP is approved.

## Recommendation One

**Ensure the NSP and associated planning documents accord with the Climate Strategy by December 2021, by having policies in place that:**

- **Meet net zero carbon by 2030**
- **Devise targets on embodied carbon in construction to meet net zero targets in developments**
- **Increase the number and quality of trees in the borough**
- **Support provision for food growing spaces and distribution**
- **Increase green space and green corridors across the borough**
- **Priorities air quality improvement actions that also have a carbon reduction benefit**
- **Support active travel (walking, cycling and public transport) and reduce reliance on private travel by motor vehicle**

## Achieving Net Zero in Development

The architects who gave evidence, Ann Griffin and Mina Hasman, recommended that Planning work with Building control to ensure that high pre construction carbon conditions on paper achieve net zero in practice, as these are not always realised in the final building.

In their presentation, they recommended three integrated steps:

- **Planning: consent to high pre construction carbon conditions on paper that achieve net zero.**
- **Utilise Building Control to ensure planning standards are met on site. This is innovative and practical, ensuring that buildings actually meet the carbon standards set down on paper. Ann Griffin warned that there is too much value engineering and exploitation of loopholes that mean standards are not achieved. A completion certificate ought to be required with Building Control issuing this, coordinated with Planning.**
- **External stakeholders and community are engaged. The progress here with declaring a Climate Emergency was noted and the architects gave the example of Low Traffic Neighbourhoods, which came in part from community organisation, as an example of an approach with engagement from multiple stakeholders.**

They emphasised the importance of the above three recommendation being fully aligned. A completion certificate would build on the existing work of Building Control, who currently have a role assuring standards, but work to lower ones.

The recommendation builds on this role, which would be clearly defined to developers, and enables checking that the carbon standards set down in Planning have been met. Other boroughs are considering a similar step, and have been doing so for the last several years but this has not yet been implemented. Completion certificates were part of the Future Homes policy framework proposed by the early Coalition government several years ago, but were not realised at that time.

Planning officers reported to the Commission that there is already coordination between Building Control and Planning, who are in the same management team and liaise regularly regarding a completion process, which happens at the point of allocation of street name.

## **Recommendation Two**

**A completion certificate ought to be required with Building Control issuing this, coordinated with Planning, and this ought to ensure that the environmental standards set out in the planning application are met.**

## **Saving More Carbon on Site**

Planning Officers told the Commission that they are looking for more carbon to be met on site. However, they also viewed the Carbon Offset Fund as an opportunity to retrofit older houses, which are leaking the most energy.

It is certainly true that insulation and retrofitting of all council owned properties, particularly prioritising homes with most risk of fuel poverty, is an important step in meeting net zero, nevertheless the Commission are keen to see more ambition here. Members suggested that meeting the Passivhaus standard for our own new council homes ought to be achieved and that the council ought to move towards zero carbon, without offsetting, for private development.

Officers pointed out the particular difficulties of high-rise schemes, which are above eight floors high, as these are much more of a challenge to reach zero carbon than lower level housing. It is recognised by leading structural engineers, such as Arup, that high rise are a technical challenge. One of the methods they propose for achieving this is to connect developments to district energy systems with micro grid schemes<sup>1</sup>.

Southwark Planning Network recommended that more use is made of Decentralised Energy networks, and that these are also a way of ensuring low-carbon and low-cost energy and can contribute to reducing fuel poverty.

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<sup>1</sup> <https://www.arup.com/perspectives/how-can-we-make-zero-carbon-high-rise-a-reality>

They reported that the NSP proposes to extend the Decentralised Energy network based on SELCHP from Bermondsey to cover additional Council properties in Old Kent Road and Peckham.

Officers reported that NSP policy P69 Energy requires all significant development to contribute to the development of Decentralised Energy networks, including by connecting to them where there is one in proximity to the development. The Commission would like to see this expanded so that all developments are encouraged to contribute to the development of Decentralised Energy (DE) networks.

### **Recommendation Three**

**Encourage all developments to contribute to the development of Decentralised Energy (DE) networks, including by connecting to them where there is one in proximity to the development, alongside mandatory requirements for significant developments.**

### **Carbon Offset Fund**

Carbon offset payments have been revised in line with the London Plan from £60 per tonne to £95 per tonne, which is welcome.

The council has received £1,933,249 in Carbon Offset funds since 2016; however, this has not yet been allocated to schemes that will save carbon. In addition, according to a GLA report, Southwark has, a further £4,868,915 carbon offsets in the pipeline; which are secured by legal agreement, but not collected<sup>2</sup>.

Work has been undertaken to develop a policy and method for allocating these funds; however, this has not been completed. A policy is due to be included in the Climate Emergency strategy. Delays in allocating funds mean more carbon is emitted, that could be saved, if the allocation process was expedited.

### **Recommendation Four**

**Establish a policy and agreed process for allocating the Carbon Offset Fund to projects at pace, and in line with the Carbon Emergency, and by December 2021 at the latest.**

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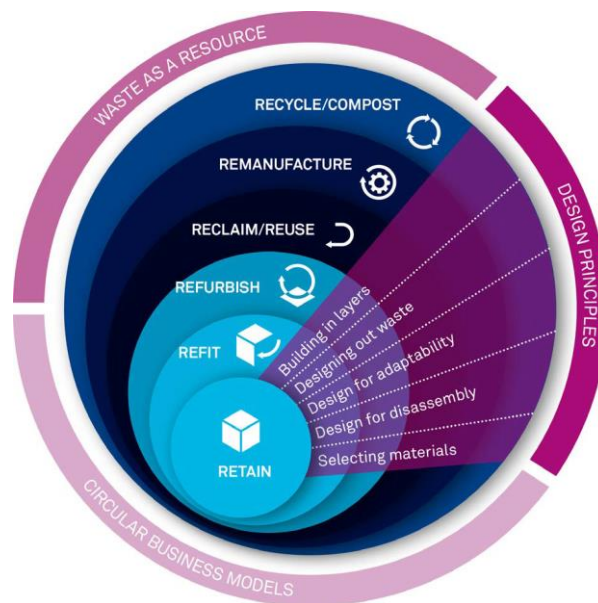
<sup>2</sup> Page 11

[https://www.london.gov.uk/sites/default/files/2020\\_carbon\\_offset\\_survey\\_monitoring\\_report.pdf](https://www.london.gov.uk/sites/default/files/2020_carbon_offset_survey_monitoring_report.pdf)

**Energy Hierarchy and the Circular Economy** The Southwark Planning Network commented that presently the NSP suggests an energy hierarchy for new development: energy efficient design and construction; low carbon energy supply; on site renewable energy generation and storage.” (p147). However, repurposing existing buildings is not mentioned in the NSP – when in their view it should be first in the energy hierarchy. They said that there appeared to be a willingness on the part of the Council to discuss with interested groups an approach to encourage developers to consider refurbishment of buildings before demolition. Southwark Planning Network recommend Southwark require developers to consider options for reusing or repurposing existing buildings before applying for permission for demolition and new build.

Southwark Planning Network also raised concerns that the council has one of the largest demolition programmes in London. This may be in part because Southwark has one of the largest council house building programmes in the country and uses development to drive increases to transport provision such as the Bakerloo Line.

London’s Circular Economy route map, produced by the London Waste and Recycling Board (LWRB), notes that one of the challenges facing London is to provide access to the housing, business premises and infrastructure that the capital’s residents and workers require – but in an efficient and sustainable way. In building terms, this hierarchy best meets this: retain, refurbish, reuse/ reclaim, remanufacture, recycle.



*Above: Building Revolutions: applying the circular economy to the built environment, David Cheshire (AECOM), RIBA, 2016 Ref: Building Revolutions’ (2016), David Cheshire, RIBA Publishing*

Planning Officers reported that they are working towards adopting the principles of the Circular Economy as laid out in the GLA document<sup>3</sup>, which draws upon the work of LWRB.

The challenge is how the council can continue to deliver more homes, including more council and social housing, and enhance the transport infrastructure, while reducing the emissions associated with building. Adopting an Energy Hierarchy is one way of embedding these principles in policy.

### **Recommendation Five**

**Planning adopt the Energy Hierarchy (retain, refurbish, reuse/ reclaim, remanufacture, recycle) in the New Southwark Plan for both development and our own council house building programme.**

### **Recommendation Six**

**That greater scope is given in NSP site descriptions to the re-use of existing buildings and that support is given to retention, refurbishing and repurposing of existing buildings and increasing the density of development on the site without a default to demolition of all existing buildings.**

### **The 15-Minute City**

The '15-minute city' proposes a city in which all the essential services and products that people need can be accessed by a walk or bike ride of no more than 15 minutes.

Changes to the way people are working due to the pandemic potentially support more localization. The 15-minute city can also support Covid-19 economic recovery, and the local economy.

Low Traffic Neighborhoods, which are being piloted by Southwark in 12 areas, are often complimentary to the 15-minute city concept. Additional measures to support the 15-minute city in Southwark planning policies would be traffic-free zones and pedestrianized areas as part of the public realm surrounding major developments. These are not mentioned in the NSP policies.

Commission members noted that developments reaching planning committee often prioritize shop fronts for cafes, because of the greater revenue generated, however a mix of amenity is needed.

Southwark Planning Network proposed using different benchmarks to assess buildings and proposed alternative metrics, not just commercial, for example increases to social and natural capital.

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<sup>3</sup> <https://www.london.gov.uk/what-we-do/regeneration/advice-and-guidance/about-good-growth-design/design-circular-economy>.

### **Recommendation Seven**

**Develop the public realm to enable active travel and support the local economy including cycle routes, walking routes and pedestrianisation, through amendments to planning policies.**

### **Recommendation Eight**

**Use a matrix to promote a mix of amenity provision in local neighborhoods, and judge the capacity of schemes to contribute to a strong local economy, and increases to social and natural capital.**