

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

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

Urban Greening Factor

Policy Context

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

London Plan Requirements

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

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

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

Southwark Plan (2022) Requirements

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

Current Approach

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

11.

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

Table 1 - Applications that have submitted UGF scores

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

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

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

Next steps

Adopting a Local UGF Score

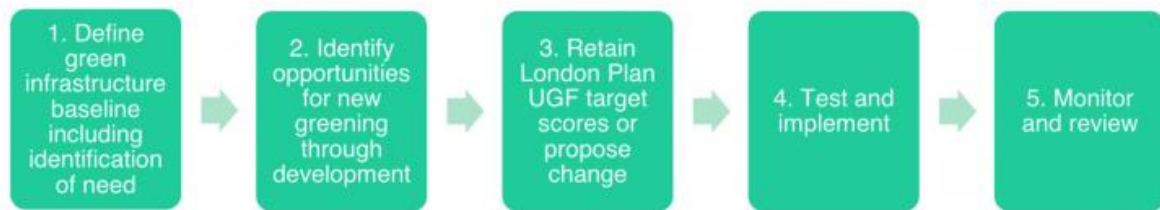


Figure 1 - London Plan (2021) Guidance on Urban Greening Factor

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

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

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

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

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

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

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

Providing Guidance to Planners and Developers on UGF

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

Early Review of Southwark Plan

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

State and another Examination in Public.

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

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

APPENDICES

Appendices	Title
N/A	N/A

BACKGROUND DOCUMENTS

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

AUDIT TRAIL

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