

Appendix M: Section 106 Planning Obligations/Community Infrastructure Levy SPD Screening Assessment and Statement of Reasons

On the determination of the need for a Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 and European Directive 2001/42/EC.

No.	Title
Appendix A	Examiner's Report on the Southwark CIL Revised Draft Charging Schedule (RDCS)
Appendix B	Southwark Community Infrastructure Charging Schedule
Appendix C	Regulation 123 List
Appendix D	Southwark CIL Infrastructure Plan (available on the website)
Appendix E	Southwark CIL Updated equalities Analysis (available on the website)
Appendix F	Southwark CIL Consultation Report (available on the website)
Appendix G	Section 106 Planning Obligations and Community Infrastructure Levy
	(CIL) Supplementary Planning Document (SPD)
Appendix H	SPD Consultation Report (available on the website)
Appendix I	SPD Updated Equalities Analysis (available on the website)
Appendix J	SPD Table of Modifications (available on the website)
Appendix K	SPD Draft Adoption Statement (available on the website)
Appendix L	SPD Habitats Regulations Assessment (available on the website)
Appendix M	SPD Sustainability Appraisal Screening Assessment and Statement of
	Reasons (available on the website)

December 2013 and March 2015

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1. Introduction

- 1.1 This Screening Assessment and Statement of Reasons has been prepared to:
 - Determine whether the contents of the Section 106 Planning Obligations/Community Infrastructure Levy SPD (the SPD) requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004 (the 2004 Regulations).
 - State the reasons for the determination (Statement of Reasons), as required by Regulation 9 of the 2004 Regulations.
- 1.2 The purpose of the SPD is to provide updated guidance which reflects the changes resulting from new government legislation and national planning policy and to ensure the SPD reflects current adopted local planning policies. It will also provide clear guidance for developers on the council's approach to securing site specific Section 106 planning obligations.
- 1.3 The legislative background set out below outlines the legislation that requires the need for this screening exercise. Section 4 sets out the process for undertaking a screening assessment of the likely significant environmental effects of the SPD and whether there is a need for a full SEA.
- 1.4 Following public consultation on the SPD with the prescribed statutory bodies, pursuant to Regulation 12 of the Town & Country Planning (Local Development) (England) Regulations 2012 and Regulation 9 of the 2004 Regulations, this Screening Assessment and Statement of Seasons has been updated to reflect the results of consultation.

2. Legislative Background

- 2.1 A Sustainability Appraisal (SA) is a tool that is used to improve the sustainability of planning policy documents. It uses a range of sustainability objectives and indicators to test whether the plans, policies and proposals can deliver sustainable development. An SA can be viewed as a yardstick against which the social, economic and environmental effects of the plan can be tested. Integrated into an SA are the requirements of the Directive 2001/42/EC in relation to the environmental assessment of the effect of certain plans and programmes. However, the sustainability appraisal covers wider social and economic effects of plans, as well as the more environmentally-focused considerations in the Directive.
- 2.2 The Planning and Compulsory Purchase Act 2004 required Local Authorities to produce Sustainability Appraisals (SA) for all local development documents including DPDs (now local plans) and SPDs. However the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2009 has now removed the need for an SA of an SPD. This is because SPDs do not normally introduce new policies or proposals or modify planning documents which have already been subject to Sustainability Appraisal. Paragraph 008 of the National Planning Practice Guidance (NPPG) confirms that SPDs do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the Local Plan.

- 2.3 The council must consider the 2004 Regulations, which incorporate the requirements of the Directive. Regulation 5 of the Directive sets out the types of plans that require an environmental assessment, which includes those that set the framework for future development consent. Regulation 5 (6) provides an exemption and states that an environmental assessment need not be carried out: (a) for a plan or programme which determines the use of a small area at local level; or (b) for minor modification to a plan or programme unless it has been determined that the plan, programme or modification, as the case may be, is likely to have significant environmental effects.
- 2.4 Detailed guidance of the 2004 Regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM 2005)
- 2.5 The council is required to consult with the prescribed statutory organisations (Natural England, English Heritage and the Environment Agency) on this Screening Statement for five weeks. The SEA Screening Statement should provide sufficient information to demonstrate whether the SPD is likely to have significant environmental affects.
- 2.6 Regulation 12 of the Town & Country Planning (Local Development) (England) Regulations 2012 states that the local planning authority must make copies of the SPD available for consultation over a period of at least 4 weeks. Southwark's Statement of Community Involvement (SCI) indicates that a 12 week consultation period is usually appropriate in Southwark.

3. S106 Planning Obligations/CIL SPD

- 3.1 All development potentially has some impact on the environment and/or infrastructure and services. Some of these impacts are of such a nature or level of significance that they require mitigation through planning obligations. As legally binding agreements between the council, developers and land owners, planning obligations secure contributions of land, money or works to offset or mitigate impacts of new development, thereby allowing development to proceed that would otherwise not be acceptable in planning terms. The legislative background for planning obligations is contained in Section 106 of the Town and Country Planning Act 1990, as amended.
- 3.2 The introduction of the Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (as amended) has resulted in significant changes to the way that developments contribute towards the provision of infrastructure that is required to support sustainable growth across the borough. Unlike Section 106 planning obligations, CIL is a standard tariff and is not negotiable. It is levied on most new developments that involve an increase of 100 sqm or more of additional floorspace or that involves the creation of one new residential unit. The amount of CIL to be paid needs to be explained in a formal document called a Charging Schedule.
- 3.3 The SPD sets out guidance on how the council will continue to apply planning obligations following the introduction of CIL. Future use will be in accordance with regulation 122 of the CIL Regulations, a planning obligation may only be entered into where the obligation is:
 - (a) necessary to make the development acceptable in planning terms;

- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.
- 3.4 The council will mitigate cumulative impacts of development on the borough's infrastructure by using CIL receipts to fund a wide range of local and strategic infrastructure that is required as a result of new development such as transport schemes, open spaces, schools and community facilities.
- 3.5 Whilst the SPD sets out the changed legislative and policy context within which Section 106 planning obligations will operate alongside CIL, it does not introduce new policy but instead focuses on implementation and requirements in relation to parent development plans, seeking developer contributions to mitigate the impact of new development. The SPD provides the context for, elaborates on and adds greater detail to the parent policies in order to ensure satisfactory infrastructure and offset the relevant adverse impacts on the environment, local economic conditions, education, health, social, recreational and community facilities that may arise from development.
- 3.6 The SPD sets out the use of planning obligations and CIL in Southwark based on the principles established across a range of planning policies and guidance in the following planning documents:
 - London Plan (2011)
 - Core Strategy (2011)
 - Canada Water Area Action Plan (2012)
 - Aylesbury Area Action Plan (2009)
 - Peckham and Nunhead Area Action Plan (2014)
 - CIL Charging Schedule (2015)
- 3.7 In addition, the SPD is related to guidance in the Residential Design Standards SPD (2011), Affordable Housing SPD (2008), Sustainable Transport SPD (2010) and the Sustainable Design and Construction SPD (2009).
- 3.8 The SPD provides applicants with greater certainty on which site specific planning obligations will be sought and provide a consistent methodology for calculating obligations. These include (among others);
 - Affordable housing provision
 - Archaeology: works and payments towards the council's archaeology service
 - Carbon offset: community energy fund
 - Children's play space
 - Employment and Enterprise
 - Outdoor amenity space
 - Public Realm measures
 - Student Housing: university schemes
 - Transport measures: Site specific
 - Wheelchair accessible housing: Offset fund
- 3.9 It also provides an overview of:
 - The legislative context,
 - Planning Policy context,
 - Approach to infrastructure delivery
 - Negotiating planning obligations

- Procedure and monitoring
- 3.10 The preparation of the SPD has involved the local community in line with the requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2012 and in line with the council's adopted Statement of Community Involvement (SCI).

4. Criteria for Assessing the Effects of Supplementary Planning Documents

Strategic Environmental Assessment

4.1 The first stage in the SEA process is for the council to determine whether or not a plan is likely to have a significant effect on the environment. The 2004 Regulations advise that this is determined by a screening process, which should use a specified set of criteria for determining the significance of effects. The criteria are taken from schedule 1 (9 (2)(a) and 10 (4)(a) of the 2004 Regulations and are identified in appendix 1 of this statement.

Sustainability Appraisal

- 4.2 ODPM's (2005) guidance suggests that where the authority has made a determination that the plan is unlikely to have any significant environmental effects (and is therefore exempt from the SEA directive) it must consider whether there are likely to be any significant economic or social effects. If these have been formally assessed in the context of the higher-level policies in local plans, it is unlikely that significant social and economic effects arise from the SPD.
- 4.3 The London Plan and the Core Strategy contain the overarching parent policies and both documents have been the subject of sustainability appraisals. The Aylesbury AAP, Canada Water AAP and the Peckham and Nunhead AAP policies were appraised during their preparation and the appraisal results were reported in Sustainability Appraisal Reports.
- 4.4 The SAs for these development plans assessed the parent policies against a range of social, economic and environmental 'sustainability objectives' using a range of indicators to consider the contribution that each policy makes towards the achievement of each sustainability objective.
- 4.5 The SPD, once adopted, will neither change policy set out in the above mentioned development plans, nor add any new policies.
- 4.6 The application of the SPD guidance will not give rise to additional social and economic effects already identified through the SAs of the London Plan, Core Strategy, Canada Water AAP, Aylesbury AAP and Peckham and Nunhead AAP. These SAs have identified positive, uncertain and negative impacts of the policies and where these impacts can be mitigated through other guidance or policies.

5. Screening assessment

5.1 The SPD does not determine the use of land or constitute a minor modification to a plan. Based on the assessment in Appendix 1, it is demonstrated that the SPD does not give rise to significant environmental effects. It is unlikely there will be any significant environmental effects arising from the SPD that were not covered in the

Sustainability Appraisals of the parent development plans. Therefore it is not necessary to carry out a full SA/SEA on this document.

- 5.2 A Sustainability Appraisal has not been prepared because the SPD does not introduce new policies, determine the use of land or constitute a minor modification to a plan. It simply provides guidance on policies contained in the London Plan, Core Strategy, Canada Water AAP, Aylesbury AAP and Peckham and Nunhead AAP and supplements the guidance contained in Supplementary Planning Documents that relate to planning obligations, sustainable development, infrastructure and other facilities to be provided through planning obligations. These policies have been sufficiently appraised in the SAs of these parent development plans (Appendix 2). The council considers that the SPD will not result in any additional significant effects to those already identified through the higher level sustainability appraisals. It provide smore detailed guidance to developers to ensure that the potential positive effects identified in the SAs of the parent development plans are realised.
- 5.3 Following the consultation on this Screening Assessment with the statutory environmental bodies, all confirmed that the Section 106 Planning Obligations/Community Infrastructure Levy SPD does not require an SEA to be undertaken.
- 5.4 The consultation period was between 16 September and 21 October 2013 for five weeks. The following responses were received.

Consultee **Environment Agency** Thank you for requesting a screening opinion on whether or not the Draft Section 106 Planning Obligations/ Community Infrastructure Levy Supplementary Planning Document will have significant environmental effects requiring full Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment of plans and Programmes Regulations 2004 and European Directive 2001/402EC. The screening assessment has been made taking account of the criteria set in Schedule 1 of the Environment Assessment of Plans and Programmes Regulation 2004. Based on the findings of the SEA Screening Statement, it is clear that the Draft Section 106 Planning Obligations/ Community Infrastructure Levy Supplementary Planning Document is unlikely to have a significant effect on the environment. We are in agreement with the council SEA screening conclusion that Draft Section 106 Planning Obligations/ Community Infrastructure Levy Supplementary Planning Document would not have significant effects on the environment. The Supplementary Planning Document will not introduce new policy but instead focuses on implementation requirements in relation to parent developments plans seeking developers' contributions to mitigate the impact of new developments. We agree that the London Plan, the Core Strategy and London Borough of Southwark's area action plans including Aylesbury, Canada water,

and the draft Peckham and Nunhead contain overarching policies and these plans have been subjected to sustainability appraisal. Therefore, the Environment Agency considers that a Strategic Environment Assessment is not required for the Supplementary Planning Document. Natural England Strategic Environmental Assessment Having checked the documentation provided, the methodology appears to be in line with what would be expected for such assessment and the reasons given for not requiring a full SEA appear sound. The fact that the Supplementary Planning Document (SPD) doesn't change or make policy would back up the fact that additional SEA and Sustainability Appraisal (SA) is not required. As stated in section 3.8 however, it would be necessary to ensure the draft Peckham and Nunhead Area Action Plan (AAP) is first adopted prior to the subsequent adoption of this SPD. Provided this is the case and any possible issues are worked out with relation to the draft AAP before its adoption then Natural England would not have any further comment to make with relation to the Draft S106 Planning Obligations and Community Infrastructure Levy SPD. **English Heritage** Thank you for the opportunity to comment on the London Borough of Southwark's Draft Screening Statement for Section 106 Planning Obligations/Community Infrastructure Levy SPD, which has been sent to English Heritage as one of the three consultation bodies set out in Stage 4 of the SEA Screening Procedure (for compliance with the SEA Directive and the 2004 Regulations). As the Government's adviser on the historic environment, English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of local planning. English Heritage has reviewed the Draft Screening Statement and is content with the London Borough of Southwark's assessment, as set out in Draft Statement, that the SPD does not trigger a need for a SEA to be prepared as part of the SPD's plan making process because the SPD supplements Local Plan

5.5 The council undertook public consultation on the SPD for a period of 12 weeks, including a 6 week period of formal consultation between 14 January 2014 and 25 February 2014. The document was advertised in the press and available on the web and in local libraries. The council notified around 3,000 consultees, including the statutory consultation bodies, and the document was publicised through community councils. Officers were also available to attend meetings of community groups and other organisations where requested.

environmental effects.

policies which have already been subject to SEA, and

because it is unlikely to have significant

5.6 In all, the council received 17 representations on the SPD from individuals, developers and organisations. A verbatim set of comments and the council's response is set out in the SPD Consultation Report. None of the representations considered that there was a need to undertake an SEA of the SPD.

Appendix 1: Criteria from schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

Characteristics of the SPD Table 1

1.	Criterion	Is there an effect?	Is there a significant environmental effect?	Justification
a)	the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,	No	No	While the SPD will not allocate resources, it will promote sustainable development by providing a framework for obtaining contributions and provisions from developers through planning obligations to fund projects and other positive activities. It sits at the lowest tier of the development plan hierarchy. The SPD provides more detail to the policies and principles established in upper tier plans which have been subject to SA incorporating SEA.
b)	the degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	No	No	Not applicable. The SPD sits at the lowest tier of the development plan hierarchy and therefore does not influence other plans or programmes. Conversely, it is influenced by and in general conformity with upper tier documents at local, regional and national level.
c)	the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	Yes	No	The SPD provides more detail to the policies and environmental principles established in the higher level plans. The SPD clarifies and adds detail to the process of securing obligations and financial contributions to mitigate the effects arising from development, including environmental effects. Overall, it

				therefore contributes positively to the integration of environmental considerations.
d)	environmental problems relevant to the plan or programme	No	No	The SPD will not introduce or exacerbate any environmental problems. Together with the Core Strategy and other adopted plans this SPD provides a context and framework within which applicants must work when preparing planning applications. The SPD will help to address environmental problems such as CO2 emissions by ensuring developer participation in or contributions towards positive schemes such as carbon off-setting and decentralised energy networks, as set out in the Core Strategy.
e)	the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	No	No	Together with the upper tier plans the SPD provides a context and framework within which applicants will need to take into consideration when preparing planning applications. The SPD supplements adopted planning policy and is not relevant to the implementation of Community legislation on the environment.

Characteristics of the effects and of the area likely to be affected

2.	Criterion	Is there an effect?	Is there a significant environmental effect?	Justification	
a)	the probability, duration, frequency and reversibility of the effects,	No	No	Together with the upper tier development plans the SPD provides a context and framework within which applicants will need to take into consideration when preparing planning applications. The overall impact of the SPD will be positive by maximising the positive environmental effects of development and by ensuring developer participation in or contributions towards efforts which minimise, avoid or off-set negative environmental impacts such as CO2 emissions	
b)	the cumulative nature of the effects	No	No	Together with the upper tier development plans the SPD provides a context and framework within which applicants will need to take into consideration when preparing planning applications. The SPD supplements adopted planning policy and there are no direct or cumulative effects arising from the SPD.	
c)	the trans-boundary nature of the effects,	Yes	No	Together with the upper tier plans the SPD provides a context and framework within which applicants will need to take into consideration when preparing planning applications. The effects of the SPD are mostly limited to areas in the vicinity of new development. However, the positive effects of developer contributions towards off-site provisions negotiated through planning obligations, such as towards carbon off-	

				setting or affordable housing, may be felt more widely across the borough.
d)	the risks to human health or the environment (e.g. due to accidents),	No	No	Together with the upper tier plans the SPD provides a context and framework within which applicants will need to take into consideration when preparing planning applications. The SPD supplements adopted planning policy and there are no risks to human health or the environment arising from the SPD.
e)	the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),	Yes	No	Together with the upper tier plans the SPD provides a context and framework within which applicants will need to take into consideration when preparing planning applications. The SPD will be relevant to proposed development borough-wide. Despite the comprehensive spatial extent of the SPD, the document supplements adopted planning policy and will itself not have a significant effect.
f)	the value and vulnerability of the area likely to be affected due to: i) special natural characteristics or cultural heritage ii) exceeded environmental quality standards or limit values iii) intensive land-use,	No	No	There are a range of special natural characteristics in the borough including Sites of Special Scientific Interest, and heritage assets, including areas of archaeological significance and listed buildings of various ratings. These are protected, conserved and enhanced by adopted plan policies which also set out prescribed standards to be met for environmental quality and intensity of land use. The SPD is unlikely to have an impact on these areas.
g)	the effects on areas or landscapes which have a recognised national, Community or international protection status	No	No	There are a range of areas or landscapes which have a recognised national, community or international protection status in the borough. These are protected, conserved

	and enhanced by adopted plan policies. The SPD is unlikely to have an impact on these
	areas.

Appendix 2: Sustainability Appraisal Review

Table 1 identifies the parent development plans of the SPD through which the social, economic and environmental effects of the planning obligation issues identified in the SPD have already been considered and appraised. Further to this, it identifies where positive, uncertain and negative impacts have been identified in the parent plan SA and where applicable mitigated by other means. This takes into account the appraisal of the development plans as a whole, including the consideration of other relevant policies to which the SPD will be relevant.

In general, it is considered that the SPD will contribute to achieving the principles of sustainable development and is aligned with the SA objectives established in the parent development plans.

SPD areas	SA of P	arent De	velopme	nt Plan	Comments	Mitigation
	London Plan	Core Strategy	Area Action Plan (A, CW, PN) *	SPDs (SDC, RDS, AH, ST)**		
Site Specific Transport measures	✓	✓	√	✓	The SPD will seek to secure contributions for transport measures for site specific initiatives and complimentary measures to promote improved access to a new development. The results of the parent development plan SAs have shown that the overall impact of these measures will be positive and will promote sustainable transport and minimise the need to travel by car. Improvements to the highway network, pedestrian and cycle routes and public transport should encourage other modes of transport to the car, leading to an improvement to the environment.	Many new developments will have transport impacts that will not be mitigated by the programmes of work and projects that have been identified in the Transport Plan. Accordingly, it will be necessary to consider these impacts at the planning application stage and determine the appropriate contribution required from the applicant. Planning obligations will be sought to improve the highway network, upgrade pedestrian and cycle facilities and fund public transport improvements, where necessary.
Public Realm	√	✓	✓		All developments that have a significant impact on the public realm shall be expected to contribute towards good urban design. The SPD will seek planning obligation contributions to mitigate the impact of new development on the public realm. Improvements will be made in the vicinity of a development. The streetscape, public spaces and design policies in the parent development plans overall scored positively in the SAs against the sustainability objectives. The policies aim to create an attractive environment by	The public realm is an important aspect of any development, and ensures that a building or set of buildings is integrated into the existing built fabric and street scene.

					linking spaces together and creating a defined town centre area. An improved public realm will help attract more inward investment to the area as well as providing an improved landscape and townscape.	
Affordable Housing	•	•	✓	√	The SPD will require a planning obligation to secure the highest level of affordable housing from a development subject to viability considerations. The benchmark is the minimum affordable housing requirement set out in the Core Strategy. Securing the provision of and contributions towards affordable housing was assessed in the parent development plan SAs and had an overall positive outcome. A continuous supply of affordable housing is needed to meet the needs of the borough. This would assist in improving social cohesion and help towards achieving positive equality outcomes throughout the borough.	The impact of providing a range of homes for people on different incomes on infrastructure will depend on the quantity and location of new housing. This will be determined by the individual schemes that are delivered and these will be subject to a sustainability assessment and other supporting studies which will need to demonstrate how the infrastructure demands of new development will be met. An infrastructure plan was prepared in support of the Core Strategy to identify existing capacity, future needs, costs, funding and timescales. This has been updated in the Infrastructure Plan which supports the CIL Charging Schedule.
Employment and Enterprise			✓		The SPD will seek to secure a contribution to assist in the placement of unemployed jobseekers from the local area into jobs within the construction phase of a development and jobs in the final development. It also will seek to secure a contribution for the loss of business floorspace in protected locations in the borough. The SAs of the parent development plans have shown that the policies to create more business floorspace and create more jobs has a positive impact by increasing employment opportunities which will help to improve people's quality of life, have a positive effect on the health and skills of the population, raise education levels and reduce social inequalities and promote social inclusion, equality, diversity	The council also proposes to use CIL receipts to deliver infrastructure which enhances employment training and skill acquisition.

					and community cohesion. Reducing deprivation is an essential part of developing socially sustainable communities, especially in growing and intensifying communities. Sourcing local labour, and reducing the need to travel is a fundamental part of creating of sustainable communities.	
Archaeology	√	V	√		The SPD will secure planning obligations to support the council's effective monitoring of archaeological matters which will ensure that this valuable resource is properly managed and preserved. The SAs of the parent development plan policies showed that requiring high standards of design for buildings and public spaces will ensure new development has a positive impact on the historic environment and cultural assets in the borough including the preservation or enhancement of archaeological priority zones and scheduled monuments.	Further information is provided in the Conservation Area Appraisals, Design and Access SPD and AAPs.
Wheelchair accessible units				✓	London Plan Policy 3.8 requires ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. The Saved Southwark Plan policy 4.3 also requires a minimum of 10% provision for all new major residential development. The SA for the London Plan and the Residential Design Standards SPD showed a positive impact for the provision of 10% wheelchair housing. It will promote equality by ensuring homes are accessible to people throughout their lifetimes. It will also help to improve the health of those less mobile by ensuring dwellings are fully accessible. The SPD will set out that in exceptional circumstances where development schemes demonstrate that it is not viable or feasible	The council will work with existing Southwark residents who have a disability and their current home is in need of adaption, to provide the off site provision. This will enable more disabled people to staying in their homes and provide accessible units to those who can not move to brand new units.

			to meet the wheel chair accessible unit policy requirement, planning obligations can be secured to mitigate the impact of the development.	
Carbon reduction			The parent development plan SA appraisals included some negative impacts due to the fact that the promotion of growth in the borough will lead to a significant amount of new development and result in increased energy use and CO2 emissions, resulting in increased contributions to climate change. However the development in the area is justified as it will help to regenerate the area and have positive impacts in relation to other sustainability objectives such as reducing poverty, improving education and skills and improving the health of the population. The SAs of the parent development plans' policies generally showed a positive impact for policies which aim to maximise energy efficiency and reduce energy use through design. The SPD will secure environmental sustainability, in terms of carbon reduction, through the use of a planning obligation where mitigation measures cannot be provided as part of a development. This will include contributions into a carbon off-set fund, taking the form of payments per residual tonne of CO ₂ to meet the emissions target, which will then be invested in agreed local CO ₂ reduction projects.	New development will be required to reduce carbon emissions though implementing the energy hierarchy. Development will need to be designed according to sustainable design and construction techniques. Further guidance on mitigation measures is provided in the Sustainable Design and Construction and Sustainability Assessment SPDs. The Sustainable Design and Construction SPD states that where planning policy energy targets cannot be met, any short-fall should be provided offsite or through a cash in lieu contribution to the borough.

^{*} AAAP (Aylesbury AAP); CWAAP (Canada Water AAP); PNAAP (Peckham and Nunhead AAP) ** SDC SPD (Sustainable Design and Construction SPD, 2008); RDS SPD (Residential Design and Construction SPD, 2008); AH SPD (Affordable Housing SPD, 2008); ST SPD (Sustainable Transport SPD, 2008)