

Representation	Officer Response
<p data-bbox="185 316 533 344">SP6: Cleaner, Greener, Safer</p> <p data-bbox="185 355 338 422">Individual NSPPSV13.1</p> <p data-bbox="185 464 1111 563">As your consultation form does not seem to be compatible with this computer, I am emailing you with the following comments which I would like to make in respect of the New Southwark Plan.</p> <p data-bbox="185 571 1077 638">I do not consider that Policy SP6 Cleaner Greener Safer and Policy 56 Open Space have been positively prepared.</p> <p data-bbox="185 679 1066 855">They do not properly address the very important issue that it is crucial for more green open space to be created in this Borough and that this space should be properly looked after. The recent decision to hold a loud music festival in May in Peckham Rye park is a good example of how not to look after a green space properly.</p> <p data-bbox="185 896 1111 1072">As more and more people move into this Borough, many of whom will increasing be living in tower blocks, more green space must be created for them so that children can connect with nature and so that there will be somewhere where people can breathe fresh air. Planting more trees will also assist with global warming.</p> <p data-bbox="185 1114 831 1142">I hope you will be able to take my views into account.</p>	<p data-bbox="1137 464 2063 890">Green Open Spaces are protected as described in P56. Southwark Open Space Strategy (2013) provides evidence that Southwark has a clear strategy for maintaining and improving green infrastructure and open space. These evidence-based documents will be further updated to reflect recent regeneration initiatives in the borough. Furthermore, P56 recognises the protection of Metropolitan Open Land (MOL) and Borough Open Land (BOL), which are identified in these policy documents. Trees are included in P59 and the council also includes a play strategy (2016) which suggests that children of a variety of ages should be catered for in the provision of open space. The existing policies therefore support the views of this comment. P13 and P11 also specifically mention Playspace, which is further emphasizes in the LBS Playing Pitch Strategy (2016) Evidence base document.</p>
<p data-bbox="185 1153 674 1220">Organisation: Bankside Residents Forum NSPPSV19.25</p> <p data-bbox="185 1262 1059 1329">The NSP policy Strategic Priority 6 is unsound because it is not consistent with the Policy 56 Open Space.</p> <p data-bbox="185 1370 1111 1434">SP6 stated objective is to protect and improve open space. This strategic goal should be clearly stated at the in the first sentence and consistently applied</p>	<p data-bbox="1137 1262 2007 1434">P56 states an objective to protect and improve open space which is addressed specifically in SP6 Point 4. To make this document align more clearly with Mayor of London Policy G4 Local Green and Open Space the change has been made to include the protection of open spaces in the introductory sentence of SP6.</p>

<p>through the detailed cleaner, greener, safer policies. The wording of the Strategic Policy and subsequent policies needs to be strengthened to ensure that the plan is effective.</p> <p>Proposed change The wording of the Strategic Policy should reinforce the importance of greenspace for people and nature, and might be something like, “We will lead the way in [inserted text: providing space for people to reconnect with nature], making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste.”</p>	
<p>Individual NSPPSV31.11</p> <p>Inconsistent with Mayor of London’s New London Plan</p> <p>Mayor of London’s Policy G4 Local green and open space states: A Local green and open spaces should be protected. B The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space. Suggested rewording for SP6: 4 <i>Increasing</i>, protecting and improving our network of open spaces, trees and biodiverse habitats and green corridors ...</p>	<p>P56 proposes to protect and improve open space in line with Mayor of London Policy G4 Local Green and Open Space. The protection of local green and open space is included under Point 4 in SP6. The accessibility of green and open spaces is defined under MOL and BOL, therefore does not need to be repeated in the policy. “Increasing” the protection of our environment is addressed in Point 1 of SP6.</p>
<p>Individual NSPPSV32.1</p> <p>The definition offered of Open Space on page 20 appears not to recognise the value to nature conservation and biodiversity of SINC’s of local importance, and therefore affords them less protection than hitherto has always been the case.</p>	<p>Southwark’s Open Space Strategy (2013) sets out the importance of protecting open space from inappropriate development, which can be designated based on its value as parks, allotments, sports grounds, green chains, SINC’s and cemeteries. Large spaces of importance are recognised as</p>

Southwark Council has always designated local SINC as BOL. In this the council has recognised their function for local nature conservation but also for education, in areas of the borough deficient in supply of such sites. i.e., in the absence of SINC of Borough importance, Local SINC perform the same function. Most of these sites are also managed and maintained by local management committees who co-ordinate groups of volunteers.

See GLA Advice Note. Process of selecting and confirming SINC in Greater London, esp Appendix A1.2.10

MOL for its overall value to London, and smaller spaces recognised through BOL as having borough-wide or more local importance.

The definition of Open Space as provided in the NSP proposed submission version is included on Page 80-81 of the New Southwark Plan and the Glossary (Appendix 6). This recognises the “acceptable uses for MOL” in point “vii. Nature conservation”. Secondly, BOL is defined under point “iii. [as] Land that contains features or landscapes of historic recreational or nature conservation value at borough level”. Both of these definitions satisfy the comment made as SINC are recognised in BOL and MOL designation. This supports the alignment of Mayor of London Policy G4 Local Green and Open Space at protecting designated BOL and MOL (in P56: Open Space) and SINC (in P59: Biodiversity).

The process of designating local SINC as BOL in Southwark will continue through the adoption of the New Southwark Plan, as referenced more specifically in the Southwark Open Space Strategy (2013) and in the definition of MOL and BOL of the plan. This supports the alignment between the emerging New Southwark Plan and the Mayor of London’s London Environment Strategy Appendix 5: Sites of Importance for Nature Conservation (SINC) Selection and in particular point A1.2.10 as mentioned in the comment.

Organisation: Friends of Burgess Park
NSPPSV62.1

The NSP policy SP6 is unsound because it is not consistent with the Policy 56 Open Space.

SP6 stated objective is to protect and improve open space. This strategic goal should be clearly stated at the in the first sentence and consistently applied through the detailed cleaner, greener, safer policies. The wording of the Strategic Policy and subsequent policies needs to be strengthened to ensure

P56 states an objective to protect and improve open space which is addressed specifically in SP6 Point 4. To make this document align more clearly with Mayor of London Policy G4 Local Green and Open Space the change has been made to include the protection of open spaces in the introductory sentence of SP6.

<p>that the plan is effective.</p> <p>Proposed change The wording of the Strategic Policy should reinforce the importance of greenspace for people and nature, and might be something like, “We will lead the way in [inserted text: providing space for people to reconnect with nature], making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste.”</p>	
<p>Organisation: Friends of Nursery Row Park NSPPSV63.1</p> <p>We strongly support the proposals to designate new Sites of Importance for Nature Conservation in North Southwark and across the Borough, and believe that SP6 is crucial and justified policy to promote the ongoing improvement and protection from development of open spaces, trees, and green corridors and habitats.</p> <p>In particular we support:</p> <ul style="list-style-type: none"> • a new SINC of Borough Importance at Nursery Row Park. • SINCs at Victory Community Park and Elba Place Nature Garden, Faraday Gardens, Salisbury Row Park, Surrey Square Park and Pasley Park <p>We believe that the very comprehensive approach taken in developing the evidence base (in Appendices A and B to EB37), including a Borough-wide biodiversity survey of local parks, provides a systematic and logical approach to site identification and ensures that all decisions are evidence-based and up to date.</p> <p>We also believe that the proposed boundary amendments to Nursery Row Park, to include all of the green space that had previously been removed from the park, is justified and essential to the future safety and biodiversity of the park (Appendices 3 and 4 to EB37).</p>	<p>Support noted.</p>

<p>Organisation: Friends of Pasley Park NSPPSV64.1</p> <p>"We strongly support the proposals to designate new Sites of Importance for Nature Conservation in North Southwark and across the Borough, and believe that SP6 is crucial and justified policy to promote the ongoing improvement and protection from development of open spaces, trees, and green corridors and habitats.</p> <p>In particular we support:</p> <ul style="list-style-type: none"> • A SINC at Pasley Park • A new SINC of Borough Importance at Nursery Row Park. • SINCs at Victory Community Park and Elba Place Nature Garden, Faraday Gardens, Salisbury Row Park, Surrey Square Park <p>We believe that the very comprehensive approach taken in developing the evidence base, including a Boroughwide biodiversity survey of local parks, provides a systematic and logical approach to site identification and ensures that all decisions are evidence-based and up to date."</p>	<p>Support noted.</p>
<p>Individual NSPPSV100.2</p> <p>SP6 Cleaner, greener, safer Not positively prepared</p> <p>The NSP policy SP6 is unsound because it is not consistent with the Policy 56 Open Space.</p> <p>SP6 stated objective is to protect and improve open space. This strategic goal should be clearly stated at the in the first sentence and consistently applied through the detailed cleaner, greener, safer policies. The wording of the Strategic Policy and subsequent policies needs to be strengthened to ensure</p>	<p>P56 states an objective to protect and improve open space which is addressed specifically in SP6 Point 4. To make this document align more clearly with Mayor of London Policy G4 Local Green and Open Space the change has been made to include the protection of open spaces in the introductory sentence of SP6.</p>

that the plan is effective.

Proposed change

The wording of the Strategic Policy should reinforce the importance of green space for people and nature, and might be something like, “We will lead the way in providing space for people to reconnect with nature], making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste.”

Individual
NSPPSV136.2

The NSP policy SP6 is unsound because it is not consistent with the Policy 56 Open Space.

One of the objectives of this strategic policy is to protect and improve open space. However, SP6 fails to recognise the need to extend the network of open and green spaces to meet the pressure of the increasing population.

There is evidence of increased conflict of interests between different uses and users of the borough’s green space: in the past few months there have been conflicts over the extent of dog walking to be allowed in cemeteries (Metropolitan Open Land) and the use of Peckham Rye Park for a music festival. In Wandsworth, we are seeing the local authority consider by-laws to prohibit informal ball games and tree climbing in parks because these are seen as nuisances.

The NSP should include positive measures to increase the availability of and access to green and open space, especially in areas where provision is already low.

Proposed change

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way in [inserted text: providing space for people to reconnect with nature], making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste.”

Organisation: Port of London Authority
NSPPSV143.1

For information, The PLA is the Statutory Harbour Authority for the Tidal Thames between Teddington and the Thames Estuary. Its statutory functions include responsibility for conservancy, dredging, maintaining the public navigation and controlling vessel movement’s and its consent is required for the carrying out of all works and dredging in the river and the provision of moorings. The PLA’s functions also include for promotion of the use of the river as an important strategic transport corridor to London.

It is noted that the document includes both strategic and development management policies, as well as area visions and site specific allocations.

Implementation, Strategic and Development Management Policies

1. Policy SP6: Cleaner, Greener, Safer

The PLA consider that there must be a reference to the River Thames and other waterways under point 4 of the policy in regards to protecting and improving the network of open spaces in the borough.

Including waterways and reference to the River Thames in the description of SP6 have been added to the amended version of the document.

Individual
NSPPSV148.2

The Plan does not contain within it Monitoring targets, Open Space designations, Sites Important for Nature Conservation and other lists of designations though these were included in the Southwark Plan 2007.

Monitoring targets, open space designations and SINC sites are found in the relevant evidence-base document such as the Southwark Open Space Strategy (2013), Southwark Open Space Strategy Evidence Report (2013),

<p>It seems these are in separate documents, which has led to a lack of representations on these important issues. It is important that these are tabled for examination hearings, with participants given the opportunity to make written statements even if they could find nothing to comment on in the Plan.</p>	<p>Southwark Sites of Interest for Nature Conservation Review (2016), which is directly link to the policy intent. These documents provide a more detailed account of these conditions and have complete soundness in delivering or implementing the policies in the New Southwark Plan. Participants are able to comment on these documents upon the individual consultation of the evidence-base documents as they are reviewed, as well as how they are relevant to the New Southwark Plan.</p>
<p>Organisation: Southwark Cyclists NSPPSV164.5</p> <p>SP6 Cleaner, greener, safer Not consistent</p> <p>The draft NLP and MTS highlight the importance of reducing motor traffic, in order to reduce congestion, air pollution (such as particulates from tyre and brake wear) and improve conditions for active travel.</p> <p>To make the policy sound add the following ' 3 Reducing motor traffic'</p>	<p>Representation noted. It is important that the NSP is read as a whole, a number of policies in this document address the management of the health impacts from transport. The Strategic Policy SP5 Healthy, Active Lives recognises the health impacts from transport through promoting a safer cycling network and the concept of active design, walking and green and open spaces. P46 states that development must improve accessibility to public transport by creating and improving walking and cycling connections. P48 Walking states that development must enhance the borough's walking networks by providing footways, routes and public realm that enable access through development site and adjoining areas. P50 Cycling ensures the delivery of the Southwark Spine cycle route and the wider cycling route network.</p>
<p>Organisation: Southwark Friends of the Earth NSPPSV165.1</p> <p>Dear Sir or Madam,</p> <p>27th February 2018.</p> <p>Re:- Submission on behalf of the above Organisation: The New Southwark Plan Submitted</p>	<p>P62: Energy sets out the minimum standards for all major developments, reducing the carbon dioxide emissions in line with the minimum requirements of the London Plan which includes 100% on 2013 Building Regulations Part L standards for residential development; and a minimum of 40% on 2013 Building Regulations Part L up to 2019, and zero carbon (100%)</p>

Version 201

" February 2018.

Please accept and acknowledge our response.

New Southwark Plan - Sections on Climate Change.

SP6 Cleaner. Greener. Safer:-

- We are very concerned about how you will make new and existing buildings energy efficient as too many of them are now constructed far too close for comfort, creating overshadowing and an invasion of privacy to which residents are entitled. The overshadowing will cause people to keep their lights on instead of designing for as much light as possible in each household to reduce consumption of energy.

- To make Southwark a borough where walking is one of the best ways to travel, the maintenance of all walking areas are of a far higher standard than at present because drivers roll over corners and park on pavements breaking the tactile paving, creating trip hazards.

To prevent excess water and creating lakes at crossings, especially where there tactile paving areas, the drains MUST be put where the water collects and kept clear to prevent a build up of debris, e.g. Rubbish and leaves.

- Dangerous- cracking up and narrowing pavements further making them walk in the road

- Too close to buildings as to cause subsidence through penetration of drainage systems

- We support in principle but we cannot emphasise enough the importance of trees to help prevent flood risk, improve air quality

- We most strongly recommend the Council to listen to all the local communities and be much clearer about what the local communities want and need to improve their local environment, no-one knows better than the local communities.

from 1 January 2019 onward, for non-residential development. This follows governmental guidance which is to procure ambitious targets to minimise Greenhouse gas emissions (Policy S12 of the New London Plan). For development that do not meet these minimum requirements, the council has a carbon offset scheme in place where mitigation of the shortfall against carbon emissions reduction requirements are secured off-site through financial contributions.

The protection and improvement of walking networks is supported in P48: Walking, which ensures walking networks are maintained to the highest possible standards.

Sustainable urban drainage is supported in P69: Reducing flooding risk, where point 1.2 identifies the requirement for “water sensitive urban design and Sustainable Urban Drainage Systems”.

P60: identifies the importance of trees, which has “an important role in enhancing air quality, reducing surface water flood risk, helping people find their way around and are important historical features” as described in the Reasons.

IP6: Statement of Community involvement ensures that all planning applications and draft policy and guidance documents are consulted upon with the local community in accordance with a Statement of Community Involvement.

Individual NSPPSV176.5

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Proposed change

The wording of the Strategic Policy should reinforce the importance of greenspace for people and nature, and might be something like, “We will lead the way in [inserted text: providing space for people to reconnect with nature], making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste.”

P56 states an objective to protect and improve open space which is addressed specifically in SP6 Point 4. To make this document align more clearly with Mayor of London Policy G4 Local Green and Open Space the change has been made to include the protection of open spaces in the introductory sentence of SP6.

Individual
NSPPSV218.8

The NSP policy SP6 is unsound because it is not consistent with the Policy 56 Open Space.

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<p>lead the way in [inserted text: providing space for people to reconnect with nature], making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste.”</p>	
<p>Organisation: Friends of Peckham Rye Park NSPPSV302.3</p> <p>Do you consider that the New Southwark Plan is sound? - Soundness No</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Positively Prepared</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.</p> <p>Ref SP6 Cleaner Greener Safer and Policy 56 Open Space</p> <p>The NSP Strategic Policy SP6 Cleaner Greener Safer and Policy P56 Open Space are unsound because they are inconsistent with the draft Mayor of London's Plan and internally inconsistent.</p> <p>Strategic Policy SP6 and Policy P56 are inconsistent with the London Plan because the London Plan's sections on green and open space emphasise the need for the extension as well as the protection of green and open space:</p> <p>- Policy G3 Metropolitan Open Land states that: The extension of MOL [Metropolitan Open Land] designations should be supported where appropriate.</p>	<p>Policy G3 of the London Plan suggests that the extension of “MOL designations should be supported where appropriate” which is supported under P58: Green infrastructure point 2 “Large-scale development must provide new publically accessible open space and green links.” This provision of new open space is considered an “improv[ement] to the network of open spaces”, as described in point 4 of SP6, therefore being aligned with the Draft New London Plan.</p> <p>Policy G4 Local green and open spaces emphasising the “creation of new areas of publicly-accessible green and open space” is again supported under P58: Green infrastructure point 2 and point 4 of SP6. Guidance to inform strategic management of these policies is included in Southwark’s Open Space Strategy (2013). Included in this document is a needs assessment of local open spaces informing the identification and classification of open space is identified. P58 and P56 work to simultaneously protect and extend the designation of open space in the borough, where appropriate, with particular emphasis on “open space and green links” (P58.2). P56: Open space emphasises the protection in quality of open spaces by restricting the type of development that can occur on these designated areas.</p> <p>To make this document align more clearly with Mayor of London Policy G4 Local Green and Open Space the change has been made to include the protection of open spaces in the introductory sentence of SP6.</p>

- Policy G4 Local green and open space states:

The creation of new areas of publicly-accessible green and open space should be supported, specially in areas of deficiency in access to public open space.

C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required. Southwark Council's Open Space Strategy (OSS, 2013) noted that the projected growth in the borough's population of 19% between 2012 -26 would increase the demand for green space. The OSS argued that because of the limited opportunities to create new open space, the focus would need to be on improving access to and the quality of existing green space. However, the proposed London Plan indicates a stronger presumption towards the creation of new open space.

The OSS recognised deficiencies in the provision of green space in parts of the borough, including Peckham, where good quality open space can help address socio-economic issues (OSS, p16). The NSP should include identify places where new open space will be provided and the facilities to be provided for particular kinds of users, e.g. young children, older children, young adults, older adults.

Do you consider that the New Southwark Plan is unsound because it is not: -
Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The wording of the Strategic Policy should reinforce the importance of

green space for people and nature, and might be something like, “We will lead the way in [inserted text: providing space for people to reconnect with nature], making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste.”

Individual
NSPPSV305.3

Do you consider that the New Southwark Plan is unsound because it is not: -
Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

The NSP policy SP6 is unsound because it is not consistent with the Policy 56 Open Space.

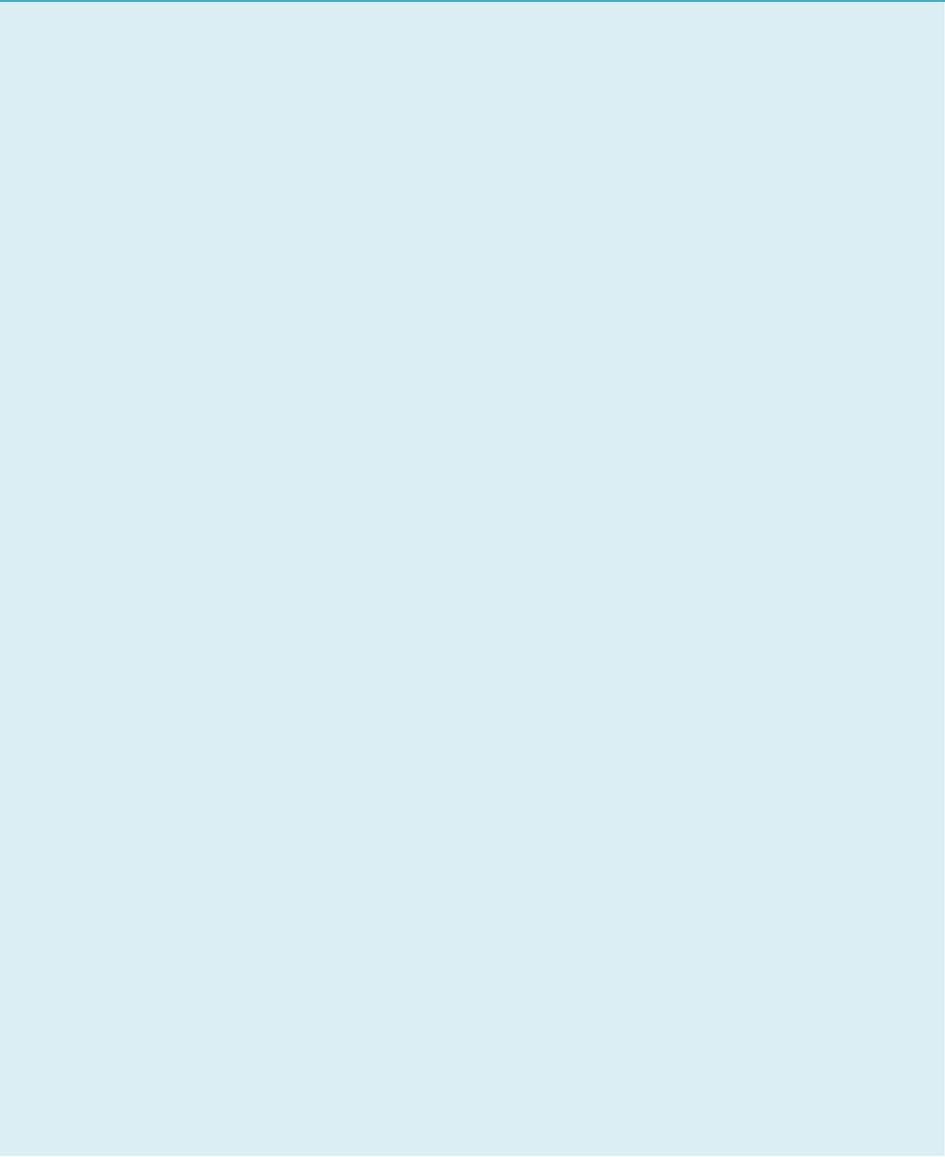
SP6 stated objective is to protect and improve open space. This strategic goal should be clearly stated at the in the first sentence and consistently applied through the detailed cleaner, greener, safer policies. The wording of the Strategic Policy and subsequent policies needs to be strengthened to ensure that the plan is effective.

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Representation	Officer Response
<p data-bbox="188 252 517 284">P54: Protection of amenity</p> <p data-bbox="188 296 685 360">Organisation: Helix International Group NSPPSV80.3</p> <p data-bbox="188 405 1111 647">Where conflict with Policy P54 ‘Protection of amenity’ arises, or is likely to arise, development proposals may be refused and the aspirations of Allocation Policy NSP 66 compromised. Conversely the introduction of new uses, such as residential and office uses, could result in the interference with established businesses. It is therefore recommended that reference is made to the potential conflict within the body of the text of Allocation Policy NSP66.</p> <p data-bbox="188 692 1093 865">It will be vital that a pragmatic approach to redevelopment and phasing is fostered. Any re-wording should acknowledge that measures to mitigate against potential short and long term amenity concerns will be required or other mechanisms agreed to help deliver development and protect existing businesses and enterprise.</p>	<p data-bbox="1142 405 2065 609">Representation noted. It is important to recognise that the NSP should be read as a whole. P54 addresses the protection of amenity to ensure that the existing resources that increase the desirability of the area are not negatively impacted by planning decisions. Any impact on amenity that a proposed development will have, must be determined as justifiable, in line with NPPF Policy 3.2 and Policy D4 of the New London Plan.</p>
<p data-bbox="188 874 676 938">Organisation: Bankside Residents Forum NSPPSV19.24</p> <p data-bbox="188 983 1106 1082">Some solution needs to be found to this if this policy P17 is to be made effective and sound as it is clearly ambiguous as to what the definition is of a pleasant environment.</p>	<p data-bbox="1142 983 2051 1050">Guidance to achieving a pleasant and healthy living environment is outlined in Southwark’s Residential Design Standards (2011).</p>
<p data-bbox="188 1129 353 1193">Individual NSPPSV244.1</p> <p data-bbox="188 1238 1111 1337">It has been brought to my attention that the cycling recommendations within The New Southwark Plan fall short of the proposals outlined in the 2015 Cycling Strategy.</p>	<p data-bbox="1142 1238 2038 1372">Representation noted. It is important to recognise that the NSP should be read as a whole. P50 Cycling ensures that cycling is an attractive option for more people. This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation.</p>

As keen cyclist and Southwark resident, I'd like The Council to look once again at the 2015 proposals and incorporate the findings in this new plan.

The New Southwark Plan is not legally sound as:

It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan.

It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons.

It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark.

At a time when cycling in London should be seen as a priority, I'm surprised that it appears to be so low on the agenda.

Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).

Representation	Officer Response
<p data-bbox="188 252 495 284">P55: Designing out crime</p> <p data-bbox="188 293 353 432">Individuals NSPPSV245.1 NSPPSV247.1 NSPPSV248.1</p> <p data-bbox="188 507 1115 898">The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> <li data-bbox="188 544 1055 611">– It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan <li data-bbox="188 619 1115 719">– It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons <li data-bbox="188 727 1115 898">– It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. Southwark needs a high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth. 	<p data-bbox="1140 507 2056 719">Representation noted. It is important to recognise that the NSP should be read as a whole. P50 Cycling ensures that cycling is an attractive option for more people. This policy is backed up by a proportionate and substantial evidence bases which cover the issues raised in this representation. Southwark Cycling Strategy (2015), Draft Kerbside Strategy, Movement Plan (2019).</p>

Representation	Officer Response
<p data-bbox="188 252 394 284">P56: Open space</p> <p data-bbox="188 293 340 357">Individual NSPPSV13.2</p> <p data-bbox="188 400 1113 501">As your consultation form does not seem to be compatible with this computer, I am emailing you with the following comments which I would like to make in respect of the New Southwark Plan.</p> <p data-bbox="188 507 1079 576">I do not consider that Policy SP6 Cleaner Greener Safer and Policy 56 Open Space have been positively prepared.</p> <p data-bbox="188 617 1068 791">They do not properly address the very important issue that it is crucial for more green open space to be created in this Borough and that this space should be properly looked after. The recent decision to hold a loud music festival in May in Peckham Rye park is a good example of how not to look after a green space properly.</p> <p data-bbox="188 833 1113 1007">As more and more people move into this Borough, many of whom will increasing be living in tower blocks, more green space must be created for them so that children can connect with nature and so that there will be somewhere where people can breathe fresh air. Planting more trees will also assist with global warming.</p> <p data-bbox="188 1048 831 1080">I hope you will be able to take my views into account.</p>	<p data-bbox="1140 400 2056 719">Green Open Spaces are protected as described in P56. Southwark Open Space Strategy (2013) provides evidence that Southwark has a clear strategy for maintaining and improving green infrastructure and open space. These evidence-based documents will be further updated to reflect recent regeneration initiatives in the borough. Furthermore, P56 recognises the protection of Metropolitan Open Land (MOL) and Borough Open Land (BOL), which are identified in these policy documents. P13 and P11 also specifically mention Playspace, which is further emphasizes in the LBS Playing Pitch Strategy (2016) Evidence base document.</p>
<p data-bbox="188 1125 676 1189">Organisation: Bankside Residents Forum NSPPSV19.26</p> <p data-bbox="188 1230 1061 1299">The NSP policy Strategic Priority 6 is unsound because it is not consistent with the Policy 56 Open Space.</p> <p data-bbox="188 1340 1113 1372">SP6 stated objective is to protect and improve open space. This strategic goal</p>	<p data-bbox="1140 1230 2056 1372">SP6 is consistent with Policy 56: Open Space, the first line of the policy addresses the need to “protect and enhance our natural environment..,” which is in line with the aims of P56 Open Space. Furthermore we add in our reasoning the importance of our parks, open spaces, trees and wildlife</p>

should be clearly stated at the in the first sentence and consistently applied through the detailed cleaner, greener, safer policies. The wording of the Strategic Policy and subsequent policies needs to be strengthened to ensure that the plan is effective.

Proposed change

The wording of the Strategic Policy should reinforce the importance of greenspace for people and nature, and might be something like, “We will lead the way in [inserted text: providing space for people to reconnect with nature], making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste.”

The NSP Policy P56 Open Space is unsound because it is inconsistent with the draft London Plan and internally inconsistent

It is inconsistent with the London Plan because the London Plan’s sections on green and open space emphasise the need for the protection and extension of green and open space:

- Policy G3 Metropolitan Open Land states that:

The extension of MOL [Metropolitan Open Land] designations should be supported where appropriate.

- Policy G4 Local green and open space states:

The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.

C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required.

The Plan is inconsistent internally because Policy P56 Open Space only refers to restrictions on development on open space, there is no policy on extending open space.

habitats. Any specific changes to our open spaces are addressed in our Southwark Open Space Strategy Southwark Open Space Strategy (2013) and the Southwark Open Space Strategy Evidence Report (2013). Furthermore, needs assessment of local green and open space are identified in this document.

P56 states an objective to protect and improve open space which is addressed specifically in SP6 Point 4. To make this document align more clearly with Mayor of London Policy G4 Local Green and Open Space the change has been made to include the protection of open spaces in the introductory sentence of SP6.

Furthermore, NSP Policy 56 is inconsistent with the site allocations section of the NSP. In the reasons for the policy (p82), it is stated that, "Open spaces are afforded protection according to their importance in accordance with MOL, BOL and OOS* designations. Regeneration provides the opportunity to provide improved open space by developing ancillary facilities or, on OOS, replacing existing open spaces with greater or better quality space." However, few site allocations mention green and open space or set out the amount of space to be allocated for this use.

Policy 56 is unsound because it has not been positively prepared, taking account of the greenspace needs of current and future residents. The amount of new open space provided for in the site allocations is totally inadequate for the scale of development envisaged. For example, in Peckham, the total area for development is 81,000m², including commercial, industrial and residential uses. No provision is made for green or open spaces. Only two of the site allocations (NSP75 and NSP78) refer to improvements to the public realm; the amount of space to be allocated for this use is not specified.

In the case of Bankside and Borough, where the Area Vision proposes to, "Increase or improve the number and quality of local open spaces, squares and public realm", only 5.2% of the total site allocations is destined for the provision of open or greenspace (3,151m²).

There is no evidence that the Council has calculated the amount of new greenspace needed to provide adequately for the growing population, taking account of requirements of different ages within the population. If mentioned at all, green and open space seemed to be squeezed into new developments, often in inappropriate locations (e.g. children's play areas on roof areas of residential developments.) The Council should show the numbers of new residents planned in each area and the amount of green and open space provision, both in terms of area to be provided (in m²) and the nature of the provision.

Some area plans have numbers of housing units to be provided per site. This information is not in the NSP site allocations. The Council should provide this information in a transparent manner and keep an on-going record of numbers of housing units created, to ensure that adequate open greenspace is provided in relation to new development.

The NSP is unsound because it is ineffective in addressing health and wellbeing needs of its residents.

Green and open space is valued in its own right and as a factor contributing to the health and wellbeing of the borough's residents. However, the NSP fails to provide significant additional green and open space to meet the needs of existing residents in areas acknowledged to be in deficit.

Where areas have a greenspace deficit (as set out in Southwark's Open Space Strategy) this should be identified in the relevant Area Vision along with a commitment to address the deficit.

The NSP does not set out how it will monitor the provision of new green and open space as part of developments to ensure that this keeps pace with the numbers of new residents coming into the borough to occupy the housing being built. This means that there is likely to be insufficient green infrastructure to enable people to exercise and lead healthy lives.

Proposed change:

Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark's growing population. State how the numbers of new people moving into new residential developments will be monitored and action taken to provide additional greenspace to address historic deficiencies and meet the needs of new residents.

Introduce a sentence to establish that greenspace will be improved and

extended to meet the needs of Southwark's growing population.

* MOL = Metropolitan Open Land; BOL = Borough Open Land; OOL = Other Open Land

The NSP is unsound because ancillary facilities should positively contribute to both openness and character of the open space.

Ancillary facilities need to be of the highest standard to deliver the intensive use in a dense urban environment with limited green space and facilities.

Areas of Southwark in the north and central wards are in areas of green space deficit.

Any ancillary facilities proposed for green spaces in the north and centre of the borough must minimise the size of the building footprint on the green open space in order to retain limited green space.

The proposed wording amend is to ensure that consideration is given to openness AND character.

Proposed wording:

... if it does not affect its openness nor detract from its character.

The NSP is unsound because it does not provide for replacement Other Open Space of both equivalent size and substantially better quality.

Replacement green space should be of a greater size and better environmental quality. This would support the new draft London Plan 2017 objective to increase green space in London and increase green space in Southwark as an area of deficit.

Individual
NSPPSV31.13

Inconsistent with Mayor of London's New London Plan

It is inconsistent with the London Plan because the London Plan's sections on green and open space emphasise the need for the protection and extension of green and open space:

- Policy G3 Metropolitan Open Land states that:

The extension of MOL [Metropolitan Open Land] designations should be supported where appropriate.

- Policy G4 Local green and open space states:

- The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.

C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required.¹⁰⁵

NSP Policy P56 only refers to restrictions on development on open space, there is no policy on extending open space.

Inconsistent with National Planning Policy Framework (NPPF)

NPPF states:

8. Promoting healthy communities

Paragraph 74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location

The Southwark Plan recommends only

2 Development will not be permitted on Other Open Space (OOS). In exceptional circumstances development may be permitted if replacement OOS of equivalent or greater size or substantially better quality can be secured on-site or nearby before development commences.

Health and wellbeing are considered across all of our policies. SP6 specifically points to the impact that poor air quality can have on health. We also will strengthen this policy to ensure that socio-economic impacts on health are considered. This is further backed up in our Evidence Base background document "The Impact of Planning Policy on Health Outcomes and Health Inequalities in Southwark and Lambeth" (2017) and the "Public Health Research Findings" document that is attributed to this.

SP6 is consistent with Policy 56: Open Space, the first line of the policy addresses the need to "protect and enhance our natural environment..," which is in line with the aims of P56 Open Space. Furthermore we add in our reasoning the importance of our parks, open spaces, trees and wildlife habitats. Any specific changes to our open spaces are addressed in our Southwark Open Space Strategy Southwark Open Space Strategy (2013) and the Southwark Open Space Strategy Evidence Report (2013). Furthermore, needs assessment of local green and open space are identified in this document.

We have incorporated your track changes to include greater recognition of green space in the SP6 Strategic Policy wording.

P56 is sound with the London Plan and recognises both protection and extension of green and open space. Metropolitan Open Land (MOL) and Borough Open Land (BOL), are identified in these policy documents with strategies to protect and enhance in concurrence with our more malleable Southwark Open Space Strategy Southwark Open Space Strategy (2013) and the Southwark Open Space Strategy Evidence Report (2013). These separate documents are more malleable to allow new strategic areas to emerge consistent with the development of regeneration in the highly dynamic borough. For this reason Policy G3 is in fact met with the current wording of P56. Furthermore both of these evidence base documents incorporated with P56 allows Policy G4 of the London Plan to be met in the New Southwark Plan.

Proposed wording for Southwark Plan to be consistent with NPPF should be:

- ... replacement OOS of equivalent or *greater size and substantially better quality* can be secured ...

Not positively prepared

Policy 56 is unsound because it has not been positively prepared, taking account of the greenspace needs of current and future residents.

The amount of new open space provided for in the site allocations is totally inadequate for the scale of development envisaged. For example, in Peckham, the total area for development is 81,000m², including commercial, industrial and residential uses. No provision is made for green or open spaces. Only two of the site allocations (NSP75 and NSP78) refer to improvements to the public realm; the amount of space to be allocated for this use is not specified. In the case of Bankside and Borough, where the Area Vision proposes to, "Increase or improve the number and quality of local open spaces, squares and public realm", only 5.2% of the total site allocations is destined for the provision of open or greenspace (3,151m²).

There is no evidence that the Council has calculated the amount of new greenspace needed to provide adequately for the growing population, taking account of requirements of different ages within the population. If mentioned at all, green and open space seemed to be squeezed into new developments, often in inappropriate locations (e.g. children's play areas on roof areas of residential developments.) The Council should show the numbers of new residents planned in each area and the amount of green and open space provision, both in terms of area to be provided (in m²) and the nature of the provision.

Some area plans have numbers of housing units to be provided per site. This information is not in the NSP site allocations. The Council should provide this information in a transparent manner and keep an on-going record of

The specific terminology of "green space" is not required to be added, as we instead use more technical terms including MOL and BOL to describe our various Open Spaces and their purpose.

As the provision of open space is dependent on successful implementation of development policy, it is not possible for site allocations to be targeted for green open space. Instead publicly owned open strategies are mentioned in our evidence base paper. This policy ensures that sufficient open space is provided to residents as part of regeneration permissions, therefore acting in sufficient alignment with the London Plan.

Ancillary facilities are specifically addressed in Point 1.2 of P56: Open Spaces where "It consists of the extension or alteration of an existing building providing that it does not result in disproportionate additions over and above the size of the original building; or It consists of the replacement of an existing building, provided that the new building is no larger than the building it replaces." Furthermore Point 1.1 of this policy already addresses "open space and if it does not affect its openness or detract from its character". This proposed wording is therefore not required.

The amount of new open space is in line with ambitious policies for an inner-city borough. All new developments will be in recognition of providing green open spaces. There is not one precise target as every part of the borough is unique and has different limitations. The map on page 43 of the Southwark Open Space Strategy (2013) outlines the density of open spaces throughout the borough which is not unanimous throughout. Furthermore, how the designated and strategic open spaces are sufficient to meet a growing population is adequately addressed. The amount of new open space provided with each new development and increase in population is a requirement in planning report and therefore is always publicly available. The monitoring in this document provides transparency and the on-going record of green open space provided with each new development.

numbers of housing units created, to ensure that adequate open greenspace is provided in relation to new development.

Not effective and not consistent with Mayor of London New London Plan

The NSP is unsound because it is ineffective in addressing health and wellbeing needs of Southwark's residents.

Green and open space is valued in its own right and as a factor contributing to the physical and mental health of the borough's residents. However, the NSP fails to provide significant additional green and open space to meet the needs of existing residents in areas acknowledged to be in deficit.

Where areas have a greenspace deficit (as set out in Southwark's Open Space Strategy) this should be identified in the relevant Area Vision along with a commitment to address the deficit as stated in the London draft plan Policy G4, 8.4.2.

The NSP does not set out how it will monitor the provision of new green and open space as part of developments to ensure that this keeps pace with the numbers of new residents coming into the borough to occupy the housing being built. This means that there is likely to be insufficient green infrastructure to enable people to exercise and lead healthy lives.

Proposed change:

Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark's growing population. State how the numbers of new people moving into new residential developments will be monitored and action taken to provide additional greenspace to address historic deficiencies and meet the needs of new residents.

Note that London Draft Plan Policy G4, 8.4.3 states: "The creation of new green or open space is essential in helping to meet the Mayor's long-term

target of making more than 50 per cent of London green by 2050. New provision or improved access should be particularly encouraged in areas of deficiency in access to public open space. It will also be important to secure appropriate management and maintenance of open spaces to ensure that a wide range of benefits can be secured and that any conflicts between uses are minimised. “

* MOL = Metropolitan Open Land; BOL = Borough Open Land; OOL = Other Open Land

Not justified

The NSP is unsound because ancillary facilities should positively contribute to both openness and character of the open space

Ancillary facilities need to be of the highest standard to deliver the intensive use in a dense urban environment with limited green space and facilities.

Areas of Southwark in the north and central wards are in areas of green space deficit.

Any ancillary facilities proposed for green spaces in the north and centre of the borough must minimise the size of the building footprint on the green open space in order to retain limited green space.

The proposed wording amend is to ensure that consideration is given to openness AND character.

Proposed wording:

... if it does not affect its openness nor detract from its character.

Individual
NSPPSV32.2

The definition offered of Open Space on page 20 appears not to recognise the value to nature conservation and biodiversity of SINC's of local importance, and therefore affords them less protection than hitherto has always been the case.

Comment noted, not all Open Space are SINC's therefore it would not be relevant to categorise them under the same definition. The protection of Open Spaces is dependent on their designated status as MOL, BOL or OOS (Other open space). This definition system allows us to be more specific with our Open Space Strategy and thereby provide greater accuracy when

Southwark Council has always designated local SINC as BOL. In this the council has recognised their function for local nature conservation but also for education, in areas of the borough deficient in supply of such sites. i.e., in the absence of SINC of Borough importance, Local SINC perform the same function. Most of these sites are also managed and maintained by local management committees who co-ordinate groups of volunteers.

See GLA Advice Note. Process of selecting and confirming SINC in Greater London, esp Appendix A1.2.10

monitoring sufficient implementation. Please see the fact box after P56 or the Glossary for greater expansion on these definitions and why they are used in this way.

Individual
NSPPSV50.7

Draft Southwark Plan Internally inconsistent

Policy P56 Open Space only refers to restrictions on development on open space, there is no policy on extending open space. Furthermore, NSP Policy 56 is inconsistent with the site allocations section of the NSP. In the reasons for the policy (p82), it is stated that, "Open spaces are afforded protection according to their importance in accordance with MOL, BOL and OOS designations. Regeneration provides the opportunity to provide improved open space by developing ancillary facilities or, on OOS, replacing existing open spaces with greater or better quality space." However, few site allocations mention green and open space or set out the amount of space to be allocated for this use.

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Health and wellbeing are considered across all of our policies. SP6 specifically points to the impact that poor air quality can have on health. We also will strengthen this policy to ensure that socio-economic impacts on health are considered. This is further backed up in our Evidence Base background document "The Impact of Planning Policy on Health Outcomes and Health Inequalities in Southwark and Lambeth" (2017) and the "Public Health Research Findings" document that is attributed to this.

SP6 is consistent with Policy 56: Open Space, the first line of the policy addresses the need to "protect and enhance our natural environment..," which is in line with the aims of P56 Open Space. Furthermore we add in our reasoning the importance of our parks, open spaces, trees and wildlife habitats. Any specific changes to our open spaces are addressed in our Southwark Open Space Strategy Southwark Open Space Strategy (2013) and the Southwark Open Space Strategy Evidence Report (2013). Furthermore, needs assessment of local green and open space are identified in this document.

We have incorporated your track changes to include greater recognition of

improvements to the public realm; the amount of space to be allocated for this use is not specified. In the case of Bankside and Borough, where the Area Vision proposes to, “Increase or improve the number and quality of local open spaces, squares and public realm”, only 5.2% of the total site allocations is destined for the provision of open or greenspace (3,151m2). There is no evidence that the Council has calculated the amount of new greenspace needed to provide adequately for the growing population, taking account of requirements of different ages within the population. If mentioned at all, green and open space seemed to be squeezed into new developments, often in inappropriate locations (e.g. children’s play areas on roof areas of residential developments.)

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The NSP does not set out how it will monitor the provision of new green and open space as part of developments to ensure that this keeps pace with the numbers of new residents coming into the borough to occupy the housing

green space in the SP6 Strategic Policy wording.

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The specific terminology of “green space” is not required to be added, as we instead use more technical terms including MOL and BOL to describe our various Open Spaces and their purpose.

As the provision of open space is dependent on successful implementation of development policy, it is not possible for site allocations to be targeted for green open space. Instead publicly owned open strategies are mentioned in our evidence base paper. This policy ensures that sufficient open space is provided to residents as part of regeneration permissions, therefore acting in sufficient alignment with the London Plan.

Ancillary facilities are specifically addressed in Point 1.2 of P56: Open Spaces where “It consists of the extension or alteration of an existing building providing that it does not result in disproportionate additions over and above the size of the original building; or It consists of the replacement of an existing building, provided that the new building is no larger than the building it replaces.” Furthermore Point 1.1 of this policy already addresses “open space and if it does not affect its openness or detract from its

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character”. This proposed wording is therefore not required.

The amount of new open space is in line with ambitious policies for an inner-city borough. All new developments will be in recognition of providing green open spaces. There is not one precise target as every part of the borough is unique and has different limitations. The map on page 43 of the Southwark Open Space Strategy (2013) outlines the density of open spaces throughout the borough which is not unanimous throughout. Furthermore, how the designated and strategic open spaces are sufficient to meet a growing population is adequately addressed. The amount of new open space provided with each new development and increase in population is a requirement in planning report and therefore is always publicly available. The monitoring in this document provides transparency and the on-going record of green open space provided with each new development.

Individual
NSPPSV60.3

13. I object to the designation for Long Meadow (OS184) at Gipsy Hill. I advocate this green area to be re-assessed as Metropolitan Open Land (MOL) or as Local Green Space.

14. I have lived by this local green area for over 50 years. Over all this time the area has always been used like a village green for the outdoor enjoyment and recreation by local residents on this open green area. The long standing special nature of this area is not sufficiently safeguard by designating as BOL and Site of Importance for Nature Conservation.

15. This unique local open green space warrants special protection, as it is of particular and very special local importance. To provide an enduring and appropriate green space designation it warrants consideration for a very high threshold of importance akin to that of Green Belt or MOL or Local Green Space.

16. A further needs assessment of local green and open space to inform policy is advocated.

Objection noted. Long Meadow at Gipsy Hill is not within the Southwark borough boundary, therefore is not relevant to the New Southwark Plan.

Organisation: Friends of Burgess Park
NSPPSV62.2

The NSP policy SP6 is unsound because it is not consistent with the Policy 56 Open Space.

SP6 stated objective is to protect and improve open space. This strategic goal should be clearly stated at the in the first sentence and consistently applied through the detailed cleaner, greener, safer policies. The wording of the Strategic Policy and subsequent policies needs to be strengthened to ensure that the plan is effective.

Proposed change

The wording of the Strategic Policy should reinforce the importance of greenspace for people and nature, and might be something like, “We will lead the way in [inserted text: providing space for people to reconnect with nature], making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste.”

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Where areas have a greenspace deficit (as set out in Southwark's Open Space Strategy) this should be identified in the relevant Area Vision along with a commitment to address the deficit.

The NSP does not set out how it will monitor the provision of new green and open space as part of developments to ensure that this keeps pace with the numbers of new residents coming into the borough to occupy the housing being built. This means that there is likely to be insufficient green infrastructure to enable people to exercise and lead healthy lives.

designated and strategic open spaces are sufficient to meet a growing population is adequately addressed. The amount of new open space provided with each new development and increase in population is a requirement in planning report and therefore is always publicly available. The monitoring in this document provides transparency and the on-going record of green open space provided with each new development.

Proposed change:

Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark's growing population. State how the numbers of new people moving into new residential developments will be monitored and action taken to provide additional greenspace to address historic deficiencies and meet the needs of new residents.

Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark's growing population.

* MOL = Metropolitan Open Land; BOL = Borough Open Land; OOL = Other Open Land

The NSP is unsound because ancillary facilities should positively contribute to both openness and character of the open space.

Organisation: Friends of Nursery Row Park
NSPPSV63.2

We believe that part of this policy is not effective because the definition of open space does not make reference to the value to nature conservation of SINC's of local importance, and hence affords them less protection than hitherto has been the case.

Southwark Council have historically designated parks which are also designated as Sites of Importance for Nature Conservation (SINC's) as at least Borough Open Land (BOL). This provides a crucial additional layer of protection for nature conservation and biodiversity in the borough. In the Policy 56 Open Space a number of requirements for BOL or MOL (Metropolitan Land) are cited, but only sites of Borough-wide nature conservation or biodiversity value are listed as requiring the additional

Please see the fact box after P56 or the Glossary for an expanded definition of MOL and BOL. P56 described MOL, BOL and OOS which are the three main designations of open space. For this reason this comment is not relevant. The Open Spaces that are designated as SINC's (Sites of Nature Conservation) are designated in our Evidence-base report "Southwark Sites of Interest for Nature Conservation Review (2016)". This also outlines the methodology used to assess each of our Open Space Sites. Findings explain that 15 candidate SINC's are proposed as Sites of Local Importance from those already existing following this assessment. For this reason defining BOL in reference to sites of nature conservation are not relevant or necessary.

protection that BOL and MOL provide over Other Open Space, the least protected of the three grades.

We note that the consultation plan version notes (SP6 pg 20) this:

4 Protecting and improving our network of open spaces, trees and biodiverse habitats and green corridors that make places open and attractive and provide important sport, leisure and food growing opportunities;

We believe that the use of “protecting” in this clause supports our view of the need to include all SINC’s (whether of Borough or Local importance) at least at the level of BOL.

To make this policy sound, an additional point (underlined) could be added to definition as follows:

The following types of open space must be BOL: i. Borough and local sites of nature conservation.

Organisation: Friends of Pasley Park
NSPPSV64.2

We believe that part of this policy is not effective because the definition of open space does not make reference to the value to nature conservation of SINC’s of local importance, and hence affords them less protection that hitherto has been the case.

Southwark Council have historically designated parks which are also designated as Sites of Importance for Nature Conservation (SINC’s) as at least Borough Open Land (BOL). This provides a crucial additional layer of protection for nature conservation and biodiversity in the borough. In the Policy 56 Open Space a number of requirements for BOL or MOL (Metropolitan land) are cited, but only sites of Borough-wide nature conservation or biodiversity value are listed as requiring the additional protection that BOL and MOL provide over Other Open Space, the least

Please see the fact box after P56 or the Glossary for an expanded definition of MOL and BOL. P56 described both MOL, BOL and OOS which are the three main designations of open space. For this reason this comment is not relevant. The Open Spaces that are designated as SINC’s (Sites of Nature Conservation) are designated in our Evidence base report "Southwark Sites of Interest for Nature Conservation Review (2016)". This also outlines the methodology used to assess each of our Open Space Sites. Findings explain that 15 candidate SINC’s are proposed as Sites of Local Importance from those already existing following this assessment. For this reason defining BOL in reference to sites of nature conservation are not relevant or necessary.

protected of the three grades.

We note that the consultation plan version notes (SPG pg 20) this:

4 Protecting and improving our network of open spaces, trees and biodiverse habitats and green corridors that make places open and attractive and provide important sport, leisure and food growing opportunities;

We believe that the use of "protecting" in this clause supports our view of the need to include all SINCs (whether of Borough or Local importance) at least at the level of BOL.

To make this policy sound, an additional point (underlined) could be added to definition as follows:

The following types of open space must be BOL: i. Borough and local sites of nature conservation.

Organisation: Greendale Property Company
NSPPSV71.4

Defining Open Space (P56)

The National Planning Policy Framework (NPPF) defines 'Open Space' as "All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity."

Paragraph 5.85 of the adopted Core Strategy (2011) identifies that such open spaces are important for a number of reasons, including because they provide "...space for and encouraging physical activity and relaxing..." including "space for playing pitches and children's play...". This includes smaller spaces, such as areas defined as 'Other Open Space' which are afforded protection as locally important spaces for neighbourhood areas (paragraph 5.90 of the adopted Core Strategy).

Southwark's policy P56 protects "important open space" designated such as MOL and BOL, whereas private open space would be considered amenity, protected under P54.

The emerging NSP protects a range of Other Open Spaces, but not "open spaces that are ancillary to, and/or within the curtilage of a building". However, NPPF 2012 (paragraph 74) protects all open space. Having regard to these different approaches, I see merit in achieving a greater level of consistency, including consistency with the policies that protect all open space. This would add a distinct local approach.

OOS have been identified for including all sizes of space, and are separated in P56 as not being given the same level of protection as BOL and MOL. Paragraph 74 is clearly addressed in Points 1 through to 2 in P56.

In 2013, LB Southwark adopted an Open Space Strategy with the focus “...on improving the quality of existing spaces so that they can be better used, merging or improving links between smaller spaces so that people have easy access to a range of activities and facilities, removing barriers to accessing spaces so more people can use them...” (para. 5.92 of the adopted Core Strategy).

Draft Policy P56 (Open Space) seeks the continued protection and improvement of Southwark’s network of open spaces as per adopted Strategic Policy 11 (Open Spaces and Wildlife).

Integral to Policy P56 of the NSP is the way in which OOS is defined. This is set out at page 80 of the draft NSP, where OOS is differentiated from Metropolitan Open Land (MOL) and Borough Open Land (BOL) and defined as a space which is neither MOL nor BOL and meets “one or more” of the following criteria:

“Allotments;

Public open space including public parks and gardens;

Playing fields and sports grounds whether publicly or privately owned;

Private open space which is of benefit to the local community;

Open space that has been created and secured through planning obligations;

Sites of ecological importance.

The fact box clarifies that “Other open space does not include open spaces that are ancillary to, and/or within the curtilage of a building.”

In general planning terms, we do not consider that this definition is consistent with national policy.

Firstly, point ‘iv’ would allow for a much wider definition of land than that set out in the NPPF (i.e. it has the potential to be all-encompassing of any land which provides a community benefit) and, therefore, the designation of OOS

In terms of addressing the caveat of “exceptional circumstances” in the wording of our policy, we have revised this to be more specifically defined in our reasons. It is important that we maintain this caveat for the reasons outlined in the comments.

The approach to assessing OOS is provided through the robust evidence base provided in the Southwark Open Space Strategy (2013) and Evidence base Report (2013).

It is not considered that providing equivalent quantity and quality is too restrictive, but in fact should be encouraged. This further strengthens Paragraph 74 of the NPPF, which aims to reduce and mitigate loss that occurs with new development where “proposed development would be replaced by equivalent or better provision in terms of quantity and quality”. The flexibility in this wording is emphasized in the “exceptional circumstances” addition; the example provided does not suggest that any further amendments must be made to the policy.

Further suggested track changes are not necessary; please see SOWN inspector report from May 2019 for thoughts on Open Space policy.

under criterion 'iv' would be at the Council's discretion, rather than a justified evidence base. In this regard the current wording would not be effective.

Point 'v' is unnecessary and should be removed. Where open space has been secured through planning obligations, it will have been identified on the basis of satisfying one of more of the above criteria. Therefore criterion item 'v' is not a criterion in itself. As such, its inclusion is irrelevant and misleading.

We set out in Appendix 1, how the definition enclosed within the 'Fact box' on page 81 of the NSP should be revised in order to satisfy the requirements of paragraph 182 of the NPPF.

Consideration should also be given to the description of Local Parks and Open Spaces as set out in the new draft London Plan (December 2017). These are defined as spaces which provide a minimum of 2ha for court games, children's play, sitting out and nature conservation within 400m of residential homes. We confirm that the suggested revised approach to defining OOS as set out in Appendix 1 accommodates these space types.

Protecting Other Open Space (P56)

In terms of the policy approach to OOS, it is important to recognise that OOS allocations comprise smaller spaces which are of a local importance at a neighbourhood level and, therefore, should not be afforded the same level of protection as MOL and BOL.

In this way, regard should be given to the national approach to promoting healthy communities. Paragraph 74 of the NPPF states that
"existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
"an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.”

To ensure soundness, emerging policy 56 (Open Space) must be consistent with the NPPF. In practice, this provides a justified approach to ensuring that local community needs are satisfied and where required retained and protected. As currently worded, draft policy 56 only permits development on OOS where “exceptional circumstances” are demonstrated and this is not consistent with national policy.

The exceptional circumstances are not defined in the draft supporting text and, therefore, it is not clear how this policy would be applied and questionably whether the policy would be effective.

The approach for assessing development on OOS needs to be informed by a robust evidence base in order to be effective.

For example, LB Southwark’s Open Space Strategy (2013) identifies that OOS site ref. OS130 (Dulwich Hamlet Football Club) is of above average quality but below average value. LB Southwark’s Playing Pitch Strategy (2016) confirms that DHFC should be protected as it provides facilities for a high performing adult club and also in light of the deficit of youth football provision. However, the Strategy identifies that the facilities need significant refurbishment in order to do this, which is not viable or indeed possible under the current financial model (page 47). In the case of youth football, the Aspire Academy no longer use the ground. As promoted by Greendale, enabling development required in order to ensure the retention of this ‘open space’ and the national planning policy approach provides a robust means by which the potential replacement of the space can be mitigated.

With regards to the above policy framework, the judgement of Collins J in *Turner v SSCLG* [2015] EWHC, and in particular the assessment of Collins J at paragraph 37, is of assistance:

"The claimant submits that the natural and so correct meaning of paragraph 74 requires any development to provide open space which is at least equivalent to that lost both in quantity and quality... I think that that is an over mechanistic approach. No doubt when spaces are fully used such as allotments or playing fields or entirely accessible recreation areas it will be difficult if not impossible to justify a loss of quantity. But it is in my view appropriate in a case such as this to consider the reality which is that the existing spaces were largely unused by the general public. The requirement in such circumstances for equivalent quantity is too restrictive and would, if applied to the letter, prevent sensible development when in reality there has been no overall loss"

The NPPF, on which Collins J is commenting above, and emerging Policy 56 (Open Space) both require "equivalent or better" re-provision.

Collins J judgment is clear that an "over mechanistic approach" to the re-provision of open space is not the correct approach, but rather that each case should be considered in "reality" and on its own merits. Accordingly the "equivalent or better" re-provision required under the emerging policy should be reconsidered on this basis.

Importantly, Collins J judgement in *Turner v SSCLG* demonstrates that in instances where existing (open) spaces are largely unused by the general public, the re-provision of a qualitatively improved open space accessible to the public with a reduction in overall quantum of open space can constitute a development where there has been "no overall loss", and be entirely acceptable in planning terms.

Similarly, in a recent appeal case in *Elmbridge* in relation to the

redevelopment of an existing cricket pitch to provide residential development alongside replacement sports and leisure facilities, the Inspector considered the basis on which quantitative and qualitative matters should be judged. The Inspector referred to how this has been considered by the Courts, stating that it should be a “...comparison of what is actually provided and used with what is proposed. Thus the approach is not a mechanistic one based on size before and after” (Appeal ref. APP/K3605/W/17/3174639). As such, it was concluded that although the existing sports provision was sufficient and usable, the proposed replacement provision would be a marked improvement in quality and also increase the availability of the facility for public use. Thereby, the proposed redevelopment presented greater overall public benefits than the existing.

This demonstrates how such policies should work both lawfully and in practice and the flexibility between quantity and quality that will ensure the long term retention of spaces of public value.

In light of this, we set out in Appendix 1 how draft policy 56 should be amended in order to be justified and consistent with national policy.

Metropolitan Open Land (MOL)

The NPPF does not explicitly refer to MOL. The concept and policy of MOL was established through the 1976 Greater London Development Plan (GLDP) which sought to conserve and protect open land within London which provided useful and attractive breaks in the townscape (para. 9.8).

The current London Plan (Policy 7.17 and para 7.56) confirms that sites designated as MOL should have the same level of protection as sites in the Green Belt and that paragraphs 79-92 of the NPPF equally apply. London Plan Policy 7.17 identifies that land which “includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London” should be designated as

MOL. The NPPF confirms that once these spaces have been defined, "...local planning authorities should plan positively to enhance the beneficial use of the Green Belt [or MOL in this case], such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation..." (para 81).

Recognising opportunities for redevelopment of sites within MOL, the Draft London Plan notes (at para 8.3.2) that the principle that land swaps could be applied to MOL where the resulting MOL "meets at least one of the criteria" set out in Part D of Policy G3. These criteria include the provision of "open air facilities, especially for leisure, recreation, sport... which serve either the whole or significant parts of London".

There is otherwise a general presumption against inappropriate development within the Green Belt (or MOL in this case) and that this should not be permitted except in very special circumstances (para 87). Very special circumstances are not considered to exist "unless the potential harm to the Green Belt [or MOL] by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations" (paragraph 88).

Planning case law has recognised the provision of community and employment benefits; 'enabling development'; public access; addressing identified housing needs; ecological enhancements and high quality design and sustainability all as examples of 'other considerations'. The construction of new buildings should be regarded as inappropriate, unless the proposal comprises an exceptional use. This includes the appropriate provision of facilities for outdoor sport and recreation (as set out under paragraph 89 of the NPPF).

In applying this approach at a local level, emerging policy 56 (Open Space) should firstly seek to protect the MOL from inappropriate development but, in fulfilling its identified role, secondly allow for opportunities for such spaces to be of public value in line with paragraph 81 of national planning policy.

For example, LB Southwark's Open Space Strategy (2013) identifies that site ref. OS128 (Greendale Playing Field), as MOL, is below average in terms of quality and value and is not fulfilling its purpose. The Strategy confirms that quality improvement is required, including the potential for a range of facilities (pp. 75-77). LB Southwark's Playing Pitch Strategy (2016) confirms that MOL site ref. OS128 (Greendale Playing Fields) needs to be protected for sports use but states that the current facilities are not publically accessible or fit for purpose and that the refurbishment of the site should be explored and supported (p. 131).

The draft wording of policy 56 (Open Space) and current allocations are therefore not wholly compliant with the national and strategic approach to open space and need to be reviews. Emerging policy 56 should seek opportunities to encourage public access and appropriate uses. The wording currently proposes a tailored version of 'exceptional' uses which does not take account of the long term purpose of such designations. In order for the plan to be sound, this policy should be re-worded. We set out how this should be addressed in Appendix 1.

Definition of Other Open Space (Fact Box)

Update the Open Space Designations to read as follows:

"Other Open Space (OOS) are Open Spaces that are not MOL or BOL, but meet one or more of the following criteria:

- i Allotments;
- ii Public open space including public parks and gardens;
- iii Playing fields and sports grounds whether publicly or privately owned;
- iv ~~Private open space which is of benefit to the local community;~~
- v ~~Open space that has been created and secured through planning obligations;~~
- vi Sites of ecological importance.

Other open space does not include open spaces that are ancillary to, and/or within the curtilage of a building."

Policy P56: Open Space

To ensure that the policy is consistent with the NPPF, we suggest that the policy is re-worded as below:

“1. Development will not be permitted on Metropolitan Open Land (MOL) or Borough Open Land (BOL). In exceptional circumstances development may be permitted when:

- 1.1 It consists of ~~ancillary~~ facilities for appropriate uses that positively contribute to the setting, accessibility and quality of the open space and if it does not affect its openness or detract from its character. ~~Ancillary~~ Facilities on MOL must be ~~essential~~ appropriate facilities for outdoor sport or recreation, cemeteries or for other uses of land which preserve the openness of MOL and do not conflict with its MOL function; Appropriate development includes facilities for outdoor sport, outdoor recreation and for cemeteries; or
- 1.2 It consists of the extension or alteration of an existing building provided that it does not result in disproportionate additions over and above the size of the original building; or
- 1.3 It consists of the replacement of an existing building, provided that the new building is in the same use and ~~is~~ not materially larger than the building it replaces.

· 2. Development will not be permitted on Other Open Space (OOS). ~~In exceptional circumstances development may be permitted if unless:~~

- 2.1 an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- 2.2 the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- 2.3 the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.”

Positively Prepared

This policy is not positively prepared because it is not consistent with Southwark's Open Space Strategy. This policy is not sound because it will not meet the needs of new residents arriving in the borough to occupy the new housing planned.

Justified

This policy is not justified because it has not properly taken into account the amount of new green space needed. The council should show the numbers of new residents planned in each area and the amount of green/open space in m2. along with the planned nature provision. The increased use of Nunhead Cemetery as a dog walking venue has already highlighted a risk to nature as there are now many more plastic bags filled with dog faeces hanging from trees.

Effective

This policy is not effective as it fails to provide additional green/open space for existing Southwark residents and is ineffective in addressing their health and well-being needs. A borough wide Public Space Protection order was implemented on 9 November 2017 due to open space pressures and resulting tensions, these pressures will only increase without additional appropriate open/green space.

Consistent with National Policy

This policy is not sound as it is inconsistent with the London plan. The London plan emphasises the need for the protection and extension of green and open space. The NSP highlights inappropriate locations for green/open space e.g. children's play areas on roof areas of residential developments.

The policy is positively prepared and consistent with Southwark's Open Space Strategy, it is also sufficient to meet the needs of new residents arriving in the borough to occupy the new housing planned. The Open Space Strategy (2013) will be updated in due course to reflect these regeneration processes. Walking routes within our SINC's is supported in the New Southwark Plan, as it encourages greater use of the open space to a wider variety of the public. It addresses the importance of open space in ensuring health and well-being needs are met, which are to be further empirically examined to follow implementation policies that respond to the Social Regeneration SP2. Both protection and extension of green and open spaces are used to describe the policy P56. Children play areas are mapped out in the Play strategy (2016), where different types of play areas are ensured to be delivered for all age brackets. Through this policy, a wide variety of play areas that accommodate a wider variety of needs is possible to be achieved.

Policy 56 is unsound because it has not been positively prepared, taking account of the greenspace needs of current and future residents. The amount of new open space provided for in the site allocations is totally inadequate for the scale of development envisaged. There is only very minimal designation for new green spaces. There is no evidence that the Council has calculated the amount of new greenspace needed to provide adequately for the growing population, taking account of requirements of different ages within the population. If mentioned at all, green and open space seemed to be squeezed into new developments, often in inappropriate locations (e.g. children's play areas on roof areas of residential developments.) The Council should show the numbers of new residents planned in each area and the amount of green and open space provision, both in terms of area to be provided (in m2) and the nature of the provision.

Not effective.

The NSP is unsound because it is ineffective in addressing health and wellbeing needs of its residents. Green and open space is valued in its own right and as a factor contributing to the health and wellbeing of the borough's residents. However, the NSP fails to provide significant additional green and open space to meet the needs of existing residents in areas acknowledged to be in deficit. Where areas have a greenspace deficit (as set out in Southwark's Open Space Strategy) this should be identified in the relevant Area Vision along with a commitment to address the deficit. The NSP does not set out how it will monitor the provision of new green and open space as part of developments to ensure that this keeps pace with the numbers of new residents coming into the borough to occupy the housing being built. This means that there is likely to be insufficient green

Green spaces are considered in the Open Space Strategy, and further green spaces cannot be designated at this time, in order to achieve housing targets. A specific m2 per population is not a feasible metric for measuring greenspace, as greenspace can be shared among many and refers to different kinds of open land designation (MOL, BOL and OOS). Greenspace in particular is not a terminology used to describe our designation of open spaces as the three categories listed above have more specific meaning. Instead it is important to ensure that everyone has access to green space within a certain radius. The monitoring and provision of green infrastructure is clear in the Open Space Strategy (2013). Children's Play strategy has been published by Southwark for (2016), which ensures that playing equipment and spaces are created for all age groups to meet a wide range of needs, in accordance to SP2.

<p>infrastructure to enable people to exercise and lead healthy lives. Proposed change: Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark’s growing population. State how the numbers of new people moving into new residential developments will be monitored and action taken to provide additional greenspace to address historic deficiencies and meet the needs of new residents. Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark’s growing population.</p>	
<p>Individual NSPPSV136.3</p> <p>Inconsistent with Mayor of London’s London Plan</p> <p>The NSP Strategic Policy SP6 Cleaner Greener Safer and Policy P56 Open Space are unsound because they are inconsistent with the draft London Plan and internally inconsistent</p> <p>Strategic Policy SP6 and Policy P56 are inconsistent with the London Plan because the London Plan’s sections on green and open space emphasise the need for the extension as well as the protection of green and open space:</p> <ul style="list-style-type: none"> • Policy G3 Metropolitan Open Land states that: The extension of MOL [Metropolitan Open Land] designations should be supported where appropriate. • Policy G4 Local green and open space states: The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space. C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required. 	<p>SP6 is consistent with Policy 56: Open Space, the first line of the policy addresses the need to “protect and enhance our natural environment..,” which is in line with the aims of P56 Open Space.</p> <p>We have incorporated your track changes to include greater recognition of green space in the SP6 Strategic Policy wording.</p> <p>P56 is sound with the London Plan and recognises both protection and extension of green and open space. Open Land (MOL) and Borough Open Land (BOL), are identified in these policy documents with strategies to protect and enhance in concurrence with our more malleable Southwark Open Space Strategy Southwark Open Space Strategy (2013) and the Southwark Open Space Strategy Evidence Report (2013). These separate documents are more malleable to allow new strategic areas to emerge consistent with the development of regeneration in the highly dynamic borough. For this reason Policy G3 is in fact met with the current wording of P56. Furthermore both of these evidence base documents incorporated with P56 allows Policy G4 of the London Plan to be met in the New Southwark Plan.</p>

Southwark Council's Open Space Strategy (OSS, 2013) noted that the projected growth in the borough's population of 19% between 2012 -26 would increase the demand for green space. The OSS argued that because of the limited opportunities to create new open space, the focus would need to be on improving access to and the quality of existing green space. However, the proposed London Plan indicates a stronger presumption towards the creation of new open space.

Ineffective in relation to SP2

NSP SP2 Social regeneration to revitalise neighbourhoods states that the SP will be achieved through, among other things, "providing green infrastructure and opportunities for healthy activities..." (p17). Southwark's Open Space Strategy (2013) recognised deficiencies in the provision of green space in parts of the borough where good quality open space can help address socio-economic issues (OSS, p16). Given these deficiencies, achieving SP2 will require the extension of green and open space and the creation of new green and open spaces.

Proposed change

The NSP SP6 Cleaner, Greener, Safer and P56 Open Space should include something like the proposed London Plan policy: "The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space".

NSP P56 should identify areas of the borough where new open space will be provided and the kinds of facilities needed for particular kinds of users, e.g. young children, older children, young adults, older adults.

Needs assessment of local green and open space are identified in Southwark Open Space Strategy Southwark Open Space Strategy (2013) and the Southwark Open Space Strategy Evidence Report (2013).

As the provision of open space is dependent on successful implementation of development policy, it is not possible for site allocations to be targeted for green open space. Instead publicly owned open strategies are mentioned in our evidence base paper. This policy ensures that sufficient open space is provided to residents as part of regeneration permissions, therefore acting in sufficient alignment with the London Plan.

The amount of new open space is in line with ambitious policies for an inner-city borough. All new developments will be in recognition of providing green open spaces. There is not one precise target as every part of the borough is unique and has different limitations. The map on page 43 of the Southwark Open Space Strategy (2013) outlines the density of open spaces throughout the borough which is not unanimous throughout. Furthermore, how the designated and strategic open spaces are sufficient to meet a growing population is adequately addressed. The amount of new open space provided with each new development and increase in population is a requirement in planning report and therefore is always publicly available. The monitoring in this document provides transparency and the on-going record of green open space provided with each new development.

The NSP meets the health and wellbeing needs of its residents. The change to ensure that a sentence which establishes that greenspace will be improved and extended will be added to the NSP document.

Individual
NSPPSV136.4

Ineffective

Policy 56 is unsound because it is ineffective in addressing the health and wellbeing needs of Southwark residents.

Policy 56 does not set out how it will monitor the provision of green and open space as part of developments to ensure that this keeps pace with the numbers of new residents coming into the borough to occupy the housing being built. This means that there is likely to be insufficient green infrastructure to enable people to exercise and lead healthy lives.

There is a great deal of evidence to demonstrate the contribution of green and open space to the health and wellbeing of local people. Strategic Policy 5 (Healthy, active lives) refers to the need for “Improving green space”. However, the NSP as a whole and Policy 56 specifically, fail to show how green spaces will be improved at a time when there is increasing pressure on already limited space, resulting in overuse and stress to green infrastructure.

Furthermore, Policy 56 is not effective in protecting the borough’s open space because the term ‘ancillary facilities’ has been used to justify the construction of new buildings on valued open space at the expense of open green space.

Not positively prepared

One examples of this is the recent construction of a play centre with a very large built footprint in Peckham Rye Park.

Policy 56 is unsound because it has not been positively prepared, taking account of the greenspace needs of current and future residents. The amount of new open space provided for in the site allocations is totally inadequate for the scale of development envisaged. For example, in Peckham, the total area for development is 81,000m², including commercial,

Health and wellbeing are considered across all of our policies. SP6 specifically points to the impact that poor air quality can have on health. We also will strengthen this policy to ensure that socio-economic impacts on health are considered. This is further backed up in our Evidence Base background document “The Impact of Planning Policy on Health Outcomes and Health Inequalities in Southwark and Lambeth” (2017) and the “Public Health Research Findings” document that is attributed to this.

SP6 is consistent with Policy 56: Open Space, the first line of the policy addresses the need to “protect and enhance our natural environment..,” which is in line with the aims of P56 Open Space. Furthermore we add in our reasoning the importance of our parks, open spaces, trees and wildlife habitats. Any specific changes to our open spaces are addressed in our Southwark Open Space Strategy Southwark Open Space Strategy (2013) and the Southwark Open Space Strategy Evidence Report (2013). Furthermore, needs assessment of local green and open space are identified in this document.

P56 is sound with the London Plan and recognises both protection and extension of green and open space. Metropolitan Open Land (MOL) and Borough Open Land (BOL) are identified in these policy documents with strategies to protect and enhance in concurrence with our more malleable Southwark Open Space Strategy Southwark Open Space Strategy (2013) and the Southwark Open Space Strategy Evidence Report (2013). These separate documents are more malleable to allow new strategic areas to emerge consistent with the development of regeneration in the highly dynamic borough. For this reason Policy G3 is in fact met with the current wording of P56. Furthermore both of these evidence base documents incorporated with P56 allows Policy G4 of the London Plan to be met in the New Southwark Plan.

As the provision of open space is dependent on successful implementation of

industrial and residential uses. Only two of the site allocations (NSP75 and NSP78) refer to improvements to the public realm; the amount of space to be allocated for this use is not specified.

Peckham Rye Park and Common are already intensively used throughout the year for a range of formal and informal activities. The Friends of Peckham Rye Park have a constant battle to prevent developments which would reduce the openness and accessibility to all of this Metropolitan Open Land, because of the lack of other accessible green space in this area.

There is no evidence that the Council has calculated the amount of new greenspace needed to provide adequately for the growing population, taking account of requirements of different ages within the population. If mentioned at all, green and open space seemed to be squeezed into new developments, often in inappropriate locations (e.g. children's play areas on roof areas of residential developments.) The Council should show the numbers of new residents planned in each area and the amount of green and open space provision, both in terms of area to be provided (in m²) and the nature of the provision.

Some area plans have numbers of housing units to be provided per site. This information could be used to assess changes in the need for open and green space in different parts of the borough. However, this information is not in the NSP site allocations. The Council should provide information on the number of housing units proposed to be provided on allocated sites and provide an up-to-date record of the numbers of housing units built, to ensure that adequate open greenspace is provided in relation to new development.

Proposed change:

Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark's growing population. State how the numbers of new people moving into new residential developments will be monitored and action taken to provide additional greenspace to address historic deficiencies and meet the needs of new residents.

development policy, it is not possible for site allocations to be targeted for green open space. Instead publicly owned open strategies are mentioned in our evidence base paper. This policy ensures that sufficient open space is provided to residents as part of regeneration permissions, therefore acting in sufficient alignment with the London Plan.

Ancillary facilities are specifically addressed in Point 1.2 of P56: Open Spaces where "It consists of the extension or alteration of an existing building providing that it does not result in disproportionate additions over and above the size of the original building; or It consists of the replacement of an existing building, provided that the new building is no larger than the building it replaces." Furthermore Point 1.1 of this policy already addresses "open space and if it does not affect its openness or detract from its character". This proposed wording is therefore not required.

The amount of new open space is in line with ambitious policies for an inner-city borough. All new developments will be in recognition of providing green open spaces. There is not one precise target as every part of the borough is unique and has different limitations. The map on page 43 of the Southwark Open Space Strategy (2013) outlines the density of open spaces throughout the borough which is not unanimous throughout. Furthermore, how the designated and strategic open spaces are sufficient to meet a growing population is adequately addressed. The amount of new open space provided with each new development and increase in population is a requirement in planning report and therefore is always publicly available. The monitoring in this document provides transparency and the on-going record of green open space provided with each new development.

<p>Organisation: Port of London Authority NSPPSV143.10</p> <p>10. Policy P56: Open Space</p> <p>The PLA support this policy particularly the reference to Thames-side paths in the policy wording. As noted above under policy P48 the PLA strongly support the enhancement of the Thames Path, and access to the path.</p>	<p>Support noted.</p>
<p>Individual NSPPSV148.12</p> <p>NSP P56 OPEN SPACE</p> <p>The policy is unsound as it</p> <ul style="list-style-type: none"> • does not allow for the extension of MOL designations, or for the creation of new areas of publicly-accessible green and open space especially in areas of deficiency. • makes no reference to a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency. • Does not list designations in the Plan, as was the case with the 2007 Southwark Plan. <p>This is contrary to NPPF and the London Plan.</p>	<p>Extension of MOL designations is referred to more accurately in P58 Green infrastructure. Needs Assessment are included in the Southwark Open Space Strategy 2013, as well as designations.</p>
<p>Individual NSPPSV153.1</p> <p>The plan does not reflect the London Plan’s policy of seeking to expand “green cover” (which goes beyond open space) in the GLA area to 50% as part of the London Mayor’s policy for a Greater London National Park and a</p>	<p>These are set out in the Southwark Open Space Strategy (2013). Green cover is not a term we specifically use at Southwark, instead refer to the factbox following P56: Open space or the Glossary where we define MOL, BOL and</p>

<p>clean healthy low pollution environment.</p> <p>I would expect considerably more detail on how Southwark intends to expand its open spaces, incorporate the various facets of the green grid and green cover (eg via pocket parks, green roofs etc) for the various areas of Southwark. I am not in a position as a Joe Citizen to suggest revised wording.</p>	<p>OOS designations.</p>
<p>Individual NSPPSV176.3</p> <p>The NSP Policy P56 Open Space is unsound because it is inconsistent with the draft London Plan and internally inconsistent</p> <p>It is inconsistent with the London Plan because the London Plan’s sections on green and open space emphasise the need for the protection and extension of green and open space:</p> <ul style="list-style-type: none"> • Policy G3 Metropolitan Open Land states that: The extension of MOL [Metropolitan Open Land] designations should be supported where appropriate. • Policy G4 Local green and open space states: The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space. C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required. <p>The Plan is inconsistent internally because Policy P56 Open Space only refers to restrictions on development on open space, there is no policy on extending open space.</p> <p>Furthermore, NSP Policy 56 is inconsistent with the site allocations section of the NSP. In the reasons for the policy (p82), it is stated that, “Open spaces are afforded protection according to their importance in accordance with MOL, BOL and OOS* designations. Regeneration provides the opportunity to</p>	<p>Health and wellbeing are considered across all of our policies. SP6 specifically points to the impact that poor air quality can have on health. We also will strengthen this policy to ensure that socio-economic impacts on health are considered. This is further backed up in our Evidence Base background document “The Impact of Planning Policy on Health Outcomes and Health Inequalities in Southwark and Lambeth” (2017) and the “Public Health Research Findings” document that is attributed to this.</p> <p>Policy G3 of the London Plan suggests that the extension of “MOL designations should be supported where appropriate” which is supported under P58: Green infrastructure point 2 “Large-scale development must provide new publically accessible open space and green links.” This provision of new open space is considered an “improv[ement] to the network of open spaces”, as described in point 4 of SP6, therefore being aligned with the Draft New London Plan.</p> <p>Policy G4 Local green and open spaces emphasising the “creation of new areas of publicly-accessible green and open space” is again supported under P58: Green infrastructure point 2 and point 4 of SP6. Guidance to inform strategic management of these policies is included in Southwark’s Open Space Strategy (2013). Included in this document is a needs assessment of local open spaces informing the identification and classification of open space is identified. P58 and P56 work to simultaneously protect and extend</p>

provide improved open space by developing ancillary facilities or, on OOS, replacing existing open spaces with greater or better quality space.” However, few site allocations mention green and open space or set out the amount of space to be allocated for this use.

Policy 56 is unsound because it has not been positively prepared, taking account of the green space needs of current and future residents. The amount of new open space provided for in the site allocations is totally inadequate for the scale of development envisaged. For example, in Peckham, the total area for development is 81,000m², including commercial, industrial and residential uses. No provision is made for green or open spaces. Only two of the site allocations (NSP75 and NSP78) refer to improvements to the public realm; the amount of space to be allocated for this use is not specified.

In the case of Bankside and Borough, where the Area Vision proposes to, “Increase or improve the number and quality of local open spaces, squares and public realm”, only 5.2% of the total site allocations is destined for the provision of open or greenspace (3,151m²).

There is no evidence that the Council has calculated the amount of new greenspace needed to provide adequately for the growing population, taking account of requirements of different ages within the population. If mentioned at all, green and open space seemed to be squeezed into new developments, often in inappropriate locations (e.g. children’s play areas on roof areas of residential developments.) The Council should show the numbers of new residents planned in each area and the amount of green and open space provision, both in terms of area to be provided (in m²) and the nature of the provision.

Some area plans have numbers of housing units to be provided per site. This information is not in the NSP site allocations. The Council should provide this information in a transparent manner and keep an on-going record of numbers of housing units created, to ensure that adequate open greenspace is provided in relation to new development.

the designation of open space in the borough, where appropriate, with particular emphasis on “open space and green links” (P58.2). P56: Open space emphasises the protection in quality of open spaces by restricting the type of development that can occur on these designated areas.

To make this document align more clearly with Mayor of London Policy G4 Local Green and Open Space the change has been made to include the protection of open spaces in the introductory sentence of SP6.

As the provision of open space is dependent on successful implementation of development policy, it is not possible for site allocations to be targeted for green open space. Instead publicly owned open strategies are mentioned in our evidence base paper. This policy ensures that sufficient open space is provided to residents as part of regeneration permissions, therefore acting in sufficient alignment with the London Plan.

Ancillary facilities are specifically addressed in Point 1.2 of P56: Open Spaces where “It consists of the extension or alteration of an existing building providing that it does not result in disproportionate additions over and above the size of the original building; or It consists of the replacement of an existing building, provided that the new building is no larger than the building it replaces.” Furthermore Point 1.1 of this policy already addresses “open space and if it does not affect its openness or detract from its character”. This proposed wording is therefore not required.

The amount of new open space is in line with ambitious policies for an inner-city borough. All new developments will be in recognition of providing green open spaces. There is not one precise target as every part of the borough is unique and has different limitations. The map on page 43 of the Southwark Open Space Strategy (2013) outlines the density of open spaces throughout the borough which is not unanimous throughout. Furthermore, how the designated and strategic open spaces are sufficient to meet a growing population is adequately addressed. The amount of new open space

The NSP is unsound because it is ineffective in addressing health and wellbeing needs of its residents.

Green and open space is valued in its own right and as a factor contributing to the health and wellbeing of the borough's residents. However, the NSP fails to provide significant additional green and open space to meet the needs of existing residents in areas acknowledged to be in deficit.

Where areas have a greenspace deficit (as set out in Southwark's Open Space Strategy) this should be identified in the relevant Area Vision along with a commitment to address the deficit.

The NSP does not set out how it will monitor the provision of new green and open space as part of developments to ensure that this keeps pace with the numbers of new residents coming into the borough to occupy the housing being built. This means that there is likely to be insufficient green infrastructure to enable people to exercise and lead healthy lives.

Proposed change:

Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark's growing population. State how the numbers of new people moving into new residential developments will be monitored and action taken to provide additional greenspace to address historic deficiencies and meet the needs of new residents.

Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark's growing population.

* MOL = Metropolitan Open Land; BOL = Borough Open Land; OOL = Other Open Land

Point No. 1.1 Not Justified The NSP is unsound because ancillary facilities should positively contribute to both openness and character of the open

provided with each new development and increase in population is a requirement in planning report and therefore is always publicly available. The monitoring in this document provides transparency and the on-going record of green open space provided with each new development.

<p>space. Ancillary facilities need to be of the highest standard to deliver the intensive use in a dense urban environment with limited green space and facilities. Areas of Southwark in the north and central wards are in areas of green space deficit.</p> <p>Any ancillary facilities proposed for green spaces in the north and centre of the borough must minimise the size of the building footprint on the green open space in order to retain limited green space.</p> <p>The proposed wording amend is to ensure that consideration is given to openness AND character.</p> <p>Southwark need to demonstrate their commitment to retaining the openness and character of Metropolitan Open Land and open space and not rely on “exceptional circumstances” to permit building on green space.</p> <p>Proposed wording: ... if it does not affect its openness nor detract from its character. More definition is needed on what the quality of openness means and how “character” is defined.</p>	
<p>Organisation: Zurich Assurance Ltd c/o Threadneedle Portfolio Services Ltd ('Threadneedle') NSPPSV216.4</p> <p>We recognise that Melior Street Community Garden has been identified as an 'Other Open Space' (OOS). We support Clause 2 that specifies that OOS can be developed on in exceptional circumstances, where replacement OOS of equivalent or greater size or substantially better quality can be secured on-site or nearby before development commences.</p> <p>The provision of open space on site is important but should be balanced</p>	<p>Support noted.</p>

<p>against the optimisation of the site’s potential, when it may be more beneficial to provide off-site improvements or contributions.</p>	
<p>Individual NSPPSV218.9</p> <p>The NSP Policy P56 Open Space is unsound because it is inconsistent with the draft London Plan and internally inconsistent</p> <p>It is inconsistent with the London Plan because the London Plan’s sections on green and open space emphasise the need for the protection and extension of green and open space:</p> <ul style="list-style-type: none"> • Policy G3 Metropolitan Open Land states that: The extension of MOL [Metropolitan Open Land] designations should be supported where appropriate. • Policy G4 Local green and open space states: The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space. C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required. <p>The Plan is inconsistent internally because Policy P56 Open Space only refers to restrictions on development on open space, there is no policy on extending open space.</p> <p>Furthermore, NSP Policy 56 is inconsistent with the site allocations section of the NSP. In the reasons for the policy (p82), it is stated that, “Open spaces are afforded protection according to their importance in accordance with MOL, BOL and OOS* designations. Regeneration provides the opportunity to provide improved open space by developing ancillary facilities or, on OOS, replacing existing open spaces with greater or better quality space.”</p> <p>However, few site allocations mention green and open space or set out the amount of space to be allocated for this use.</p>	<p>Policy G3 of the London Plan suggests that the extension of “MOL designations should be supported where appropriate” which is supported under P58: Green infrastructure point 2 “Large-scale development must provide new publically accessible open space and green links.” This provision of new open space is considered an “improve[ment] to the network of open spaces”, as described in point 4 of SP6, therefore being aligned with the Draft New London Plan.</p> <p>Policy G4 Local green and open spaces emphasising the “creation of new areas of publicly-accessible green and open space” is again supported under P58: Green infrastructure point 2 and point 4 of SP6. Guidance to inform strategic management of these policies is included in Southwark’s Open Space Strategy (2013). Included in this document is a needs assessment of local open spaces informing the identification and classification of open space is identified. P58 and P56 work to simultaneously protect and extend the designation of open space in the borough, where appropriate, with particular emphasis on “open space and green links” (P58.2). P56: Open space emphasises the protection in quality of open spaces by restricting the type of development that can occur on these designated areas.</p> <p>To make this document align more clearly with Mayor of London Policy G4 Local Green and Open Space the change has been made to include the protection of open spaces in the introductory sentence of SP6.</p>

Policy 56 is unsound because it has not been positively prepared, taking account of the greenspace needs of current and future residents. The amount of new open space provided for in the site allocations is totally inadequate for the scale of development envisaged. For example, in Peckham, the total area for development is 81,000m², including commercial, industrial and residential uses. No provision is made for green or open spaces. Only two of the site allocations (NSP75 and NSP78) refer to improvements to the public realm; the amount of space to be allocated for this use is not specified.

In the case of Bankside and Borough, where the Area Vision proposes to, “Increase or improve the number and quality of local open spaces, squares and public realm”, only 5.2% of the total site allocations is destined for the provision of open or greenspace (3,151m²).

There is no evidence that the Council has calculated the amount of new greenspace needed to provide adequately for the growing population, taking account of requirements of different ages within the population. If mentioned at all, green and open space seemed to be squeezed into new developments, often in inappropriate locations (e.g. children’s play areas on roof areas of residential developments.) The Council should show the numbers of new residents planned in each area and the amount of green and open space provision, both in terms of area to be provided (in m²) and the nature of the provision.

Some area plans have numbers of housing units to be provided per site. This information is not in the NSP site allocations. The Council should provide this information in a transparent manner and keep an on-going record of numbers of housing units created, to ensure that adequate open greenspace is provided in relation to new development.

The NSP is unsound because it is ineffective in addressing health and

wellbeing needs of its residents.

Green and open space is valued in its own right and as a factor contributing to the health and wellbeing of the borough's residents. However, the NSP fails to provide significant additional green and open space to meet the needs of existing residents in areas acknowledged to be in deficit.

Where areas have a greenspace deficit (as set out in Southwark's Open Space Strategy) this should be identified in the relevant Area Vision along with a commitment to address the deficit.

The NSP does not set out how it will monitor the provision of new green and open space as part of developments to ensure that this keeps pace with the numbers of new residents coming into the borough to occupy the housing being built. This means that there is likely to be insufficient green infrastructure to enable people to exercise and lead healthy lives.

Proposed change:

Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark's growing population. State how the numbers of new people moving into new residential developments will be monitored and action taken to provide additional greenspace to address historic deficiencies and meet the needs of new residents.

Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark's growing population.

* MOL = Metropolitan Open Land; BOL = Borough Open Land; OOL = Other Open Land

The NSP is unsound because ancillary facilities should positively contribute to both openness and character of the open space.

<p>Ancillary facilities need to be of the highest standard to deliver the intensive use in a dense urban environment with limited green space and facilities. Areas of Southwark in the north and central wards are in areas of green space deficit.</p> <p>Any ancillary facilities proposed for green spaces in the north and centre of the borough must minimise the size of the building footprint on the green open space in order to retain limited green space.</p> <p>The proposed wording amend is to ensure that consideration is given to openness AND character.</p> <p>Proposed wording: ... if it does not affect its openness nor detract from its character.</p>	
<p>Individual NSPPSV219.4</p> <p>This policy is not positively prepared as some aspects of the policy are vague or unclear. This policy is not sound because it will not meet the needs of new residents arriving in the borough to occupy the new housing planned. The council should show the numbers of new residents planned in each area and the amount of green/open space in m2.</p> <p>This policy is not justified because it has not properly taken into account the amount of new green space needed. The council should show the planned nature provision. (Ipsos MORI, ibid, p4) "Residents acknowledged that open spaces are limited and often overcrowded. They would like to see more allotments and community gardens.</p> <p>This policy is not effective as it is unlikely to achieve the aim of increasing activities and life opportunities on offer as it fails to provide additional green/open space for existing Southwark residents and is ineffective in</p>	<p>This detailed information can be found in the Southwark Open Space Strategy and an Open Space Addendum which is currently being drafted for publication. The findings of the Ipsos Mori study will be more clearly addressed in the Open Space Addendum, as the current Open Space Strategy predecessor to this research. The evidence-base suggests that this policy should be sound in increasing activities and life opportunities for Southwark residents to meet health and well-being needs. While P56 looks at the maintenance of Open Space P58 Green Infrastructure describes strategically ensuring new green space is created with new development and population growth.</p>

<p>addressing their health and well-being needs.</p> <p>This policy is not sound as it is not consistent with the Mayor’s London plan. The London plan emphasises the need for the protection and extension of green and open space. NSP P56 only refers to restrictions on development on open space, there is no policy on extending open space</p>	
<p>Individual NSPPSV246.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. <p>After that, the more you can give some reasons in your own words why increasing cycling for all and reducing air pollution, the better. We suggest the Plan should be drawn up again to include:</p> <ol style="list-style-type: none"> 1. A green grid, improving connectivity for wildlife and clean air for physical activity by greening corridors between our parks and green spaces with trees and other planting 2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth 3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets 4. No new private car parking in new developments other than disabled and car club bays 	<p>The New Southwark Plan complies with all national legislation. An update to the 2009 Transport Strategy will be made in 2019 with the publication of the Movement Plan. P66 refers to Air Quality, which is positively prepared in line with our Air Quality Evidence-Base Report. Reducing congestion is identified in the reasons of SP6 and further supported in SP5 policies to reduce motor vehicles (P47: Highways impacts).</p> <p>A green grid is included in our Southwark Open Spaces Strategy 2013. This is relevant to P58, P59 and P60 of the New Southwark Plan.</p> <p>Cycle and Walking routes are designated in updated movement plan which is to be published in 2019, which provides an updated plan for Cycle and walking Routes P48, P49 and P50.</p> <p>Reduction of motor traffic is also addressed in our 2019 Movement Plan, along with strategies for parking in new developments (P52).</p>

<p>5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.</p>	
<p>Individuals NSPPSV247.1 NSPPSV248.1</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on an totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark. Southwark needs a high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth. 	<p>All development proposals are assessed in the context of London Plan, TfL/DfT Transport Assessment/Travel Plan guidance and NSP. Hence, this policy as set out, in conjunction with Policy P53, the London Plan and TfL/DfT Transport Assessment/Travel Plan guidance, is adequate.</p>
<p>Organisation: Friends of Peckham NSPPSV302.1</p> <p>Do you consider that the New Southwark Plan is sound? - Soundness No</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Effective</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not</p>	<p>Policy G3 of the London Plan suggests that the extension of “MOL designations should be supported where appropriate” which is supported under P58: Green infrastructure point 2 “Large-scale development must provide new publically accessible open space and green links.” This provision of new open space is considered an “improv[ement] to the network of open spaces”, as described in point 4 of SP6, therefore being aligned with the Draft New London Plan.</p>

legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

Policy 56 is unsound because it is ineffective in addressing the health and wellbeing needs of Southwark residents.

The NSP does not set out how it will monitor the provision of green and open space as part of developments to ensure that this keeps pace with the numbers of new residents coming into the borough to occupy the housing being built. This means that there is likely to be insufficient green infrastructure to enable people to exercise and lead healthy lives.

There is a great deal of evidence to demonstrate the contribution of green and open space to the health and wellbeing of local people. Strategic Policy 5 (Healthy, active lives) refers to the need for “Improving green space”.

However, the NSP as a whole and Policy 56 specifically, fail to show how green spaces will be improved at a time when there is increasing pressure on already limited space, resulting in overuse and stress to green infrastructure.

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark’s growing population. State how the numbers of new people moving into new residential developments will be monitored and action taken to provide additional greenspace to address historic deficiencies and meet the needs of new residents.

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not

Policy G4 Local green and open spaces emphasising the “creation of new areas of publicly-accessible green and open space” is again supported under P58: Green infrastructure point 2 and point 4 of SP6. Guidance to inform strategic management of these policies is included in Southwark’s Open Space Strategy (2013). Included in this document is a needs assessment of local open spaces informing the identification and classification of open space is identified. P58 and P56 work to simultaneously protect and extend the designation of open space in the borough, where appropriate, with particular emphasis on “open space and green links” (P58.2). P56: Open space emphasises the protection in quality of open spaces by restricting the type of development that can occur on these designated areas.

To make this document align more clearly with Mayor of London Policy G4 Local Green and Open Space the change has been made to include the protection of open spaces in the introductory sentence of SP6.

legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

Ref SP6 Cleaner Greener Safer and Policy 56 Open Space

The NSP Strategic Policy SP6 Cleaner Greener Safer and Policy P56 Open Space are unsound because they are inconsistent with the draft Mayor of London's Plan and internally inconsistent.

Strategic Policy SP6 and Policy P56 are inconsistent with the London Plan because the London Plan's sections on green and open space emphasise the need for the extension as well as the protection of green and open space:

- Policy G3 Metropolitan Open Land states that:

The extension of MOL [Metropolitan Open Land] designations should be supported where appropriate.

- Policy G4 Local green and open space states:

The creation of new areas of publicly-accessible green and open space should be supported, specially in areas of deficiency in access to public open space.

C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required. Southwark Council's Open Space Strategy (OSS, 2013) noted that the projected growth in the borough's population of 19% between 2012 -26 would increase the demand for green space. The OSS argued that because of the limited opportunities to create new open space, the focus would need to be on improving access to and the quality of existing green space. However, the proposed London Plan indicates a stronger presumption towards the creation of new open space.

The OSS recognised deficiencies in the provision of green space in parts of the borough, including Peckham, where good quality open space can help address socio-economic issues (OSS, p16). The NSP should include identify places where new open space will be provided and the facilities to be provided for particular kinds of users, e.g. young children, older children, young adults, older adults.

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

Policy 56 is unsound because it has not been positively prepared, taking account of the green space needs of current and future residents.

The amount of new open space provided for in the site allocations is totally inadequate for the scale of development envisaged. For example, in Peckham, the total area for development is 81,000m², including commercial, industrial and residential uses. Only two of the site allocations (NSP75 and NSP78) refer to improvements to the public realm; the amount of space to be allocated for this use is not specified.

Peckham Rye Park and Common are already intensively used throughout the year for a range of formal and informal activities. The Friends of Peckham Rye Park have a constant battle to prevent developments which would reduce the openness and accessibility to all of this Metropolitan Open Land, because of the lack of other accessible green space in this area. For example there are proposals to reduce the area of the Common by developing a privately run LIDO which would remove land from being openly accessible.

There is no evidence that the Council has calculated the amount of new green space needed to provide adequately for the growing population, taking account of requirements of different ages within the population. If

mentioned at all, green and open space seemed to be squeezed into new developments, often in inappropriate locations (e.g. children's play areas on roof areas of residential developments.) The Council should show the numbers of new residents planned in each area and the amount of green and open space provision, both in terms of area to be provided (in m²) and the nature of the provision.

Some area plans have numbers of housing units to be provided per site. This information could be used to assess changes in the need for open and green space in different parts of the borough. However, this information is not in the NSP site allocations. The Council should provide information on the number of housing units proposed to be provided on allocated sites and provide an up-to-date record of the numbers of housing units built, to ensure that adequate open green space is provided in relation to new development.

Introduce a sentence to establish that green space will be improved and extended to meet the needs of Southwark's growing population. State how the numbers of new people moving into new residential developments will be monitored and action taken to provide additional green space to address historic deficiencies and meet the needs of new residents.

Policy 56 is not effective in protecting the borough's open space because the term 'ancillary facilities' has been used to justify the construction of new buildings on valued open space at the expense of open green space.

One example of this is the recent construction of a play centre with a very large footprint in Peckham Rye Park.

Another is the open attitude to the proposal to remove an area of Peckham Rye Common to construct a privately run LIDO which is not open and accessible to all.

Individual
NSPPSV305.2

The NSP policy SP6 is unsound because it is not consistent with the Policy 56 Open Space.

SP6 stated objective is to protect and improve open space. This strategic goal should be clearly stated at the in the first sentence and consistently applied through the detailed cleaner, greener, safer policies. The wording of the Strategic Policy and subsequent policies needs to be strengthened to ensure that the plan is effective.

The wording of the Strategic Policy should reinforce the importance of greenspace for people and nature, and might be something like, “We will lead the way in [inserted text: providing space for people to reconnect with nature], making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste.”

To make this document align more clearly with Mayor of London Policy G4 Local Green and Open Space the change has been made to include the protection of open spaces in the introductory sentence of SP6.

Individual
NSPPSV316.9

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

The NSP Policy P56 Open Space is unsound because it is inconsistent with the draft London Plan and internally inconsistent It is inconsistent with the London Plan because the London Plan’s sections on green and open space emphasise the need for the protection and extension of green and open space:

· Policy G3 Metropolitan Open Land states that:
The extension of MOL [Metropolitan Open Land] designations should be

Policy G3 of the London Plan suggests that the extension of “MOL designations should be supported where appropriate” which is supported under P58: Green infrastructure point 2 “Large-scale development must provide new publically accessible open space and green links.” This provision of new open space is considered an “improv[ement] to the network of open spaces”, as described in point 4 of SP6, therefore being aligned with the Draft New London Plan.

Policy G4 Local green and open spaces emphasising the “creation of new areas of publicly-accessible green and open space” is again supported under P58: Green infrastructure point 2 and point 4 of SP6. Guidance to inform strategic management of these policies is included in Southwark’s Open Space Strategy (2013). Included in this document is a needs assessment of

supported where appropriate.

· Policy G4 Local green and open space states:

The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space. C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required.

The Plan is inconsistent internally because Policy P56 Open Space only refers to restrictions on development on open space, there is no policy on extending open space.

Furthermore, NSP Policy 56 is inconsistent with the site allocations section of the NSP. In the reasons for the policy (p82), it is stated that, "Open spaces are afforded protection according to their importance in accordance with MOL, BOL and OOS* designations. Regeneration provides the opportunity to provide improved open space by developing ancillary facilities or, on OOS, replacing existing open spaces with greater or better quality space." However, few site allocations mention green and open space or set out the amount of space to be allocated for this use.

Policy 56 is unsound because it has not been positively prepared, taking account of the greenspace needs of current and future residents. The amount of new open space provided for in the site allocations is totally inadequate for the scale of development envisaged. For example, in Peckham, the total area for development is 81,000m², including commercial, industrial and residential uses. No provision is made for green or open spaces. Only two of the site allocations (NSP75 and NSP78) refer to improvements to the public realm; the amount of space to be allocated for this use is not specified.

local open spaces informing the identification and classification of open space is identified. P58 and P56 work to simultaneously protect and extend the designation of open space in the borough, where appropriate, with particular emphasis on "open space and green links" (P58.2). P56: Open space emphasises the protection in quality of open spaces by restricting the type of development that can occur on these designated areas.

To make this document align more clearly with Mayor of London Policy G4 Local Green and Open Space the change has been made to include the protection of open spaces in the introductory sentence of SP6.

In the case of Bankside and Borough, where the Area Vision proposes to, “Increase or improve the number and quality of local open spaces, squares and public realm”, only 5.2% of the total site allocations is destined for the provision of open or greenspace (3,151m²).

There is no evidence that the Council has calculated the amount of new greenspace needed to provide adequately for the growing population, taking account of requirements of different ages within the population. If mentioned at all, green and open space seemed to be squeezed into new developments, often in inappropriate locations (e.g. children’s play areas on roof areas of residential developments.) The Council should show the numbers of new residents planned in each area and the amount of green and open space provision, both in terms of area to be provided (in m²) and the nature of the provision.

Some area plans have numbers of housing units to be provided per site. This information is not in the NSP site allocations. The Council should provide this information in a transparent manner and keep an on-going record of numbers of housing units created, to ensure that adequate open greenspace is provided in relation to new development.

The NSP is unsound because it is ineffective in addressing health and wellbeing needs of its residents.

Green and open space is valued in its own right and as a factor contributing to the health and wellbeing of the borough’s residents. However, the NSP fails to provide significant additional green and open space to meet the needs of existing residents in areas acknowledged to be in deficit.

Where areas have a greenspace deficit (as set out in Southwark’s Open Space Strategy) this should be identified in the relevant Area Vision along with a commitment to address the deficit.

The NSP does not set out how it will monitor the provision of new green and

open space as part of developments to ensure that this keeps pace with the numbers of new residents coming into the borough to occupy the housing being built. This means that there is likely to be insufficient green infrastructure to enable people to exercise and lead healthy lives.

Proposed change:

Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark's growing population. State how the numbers of new people moving into new residential developments will be monitored and action taken to provide additional greenspace to address historic deficiencies and meet the needs of new residents.

Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark's growing population.

* MOL = Metropolitan Open Land; BOL = Borough Open Land; OOL = Other Open Land

The NSP is unsound because ancillary facilities should positively contribute to both openness and character of the open space.

Ancillary facilities need to be of the highest standard to deliver the intensive use in a dense urban environment with limited green space and facilities. Areas of Southwark in the north and central wards are in areas of green space deficit.

Any ancillary facilities proposed for green spaces in the north and centre of the borough must minimise the size of the building footprint on the green open space in order to retain limited green space.

The proposed wording amend is to ensure that consideration is given to openness AND character.

Proposed wording:

... if it does not affect its openness nor detract from its character

Policy 56 Open Space Point No. 2

<p>Not effective The NSP is unsound because it does not provide for replacement Other Open Space of both equivalent size and substantially better quality.</p> <p>Replacement green space should be of a greater size and better environmental quality. This would support the new draft London Plan 2017 objective to increase green space in London and increase green space in Southwark as an area of deficit.</p> <p>Proposed wording: <i>... replacement OOS of equivalent or greater size AND substantially better quality can be secured etc.</i></p>	
<p>Individual NSPPSV321.1</p> <p>We believe that this policy needs to be more explicit over the protection and enhancement of MOL and Borough Open Land, in line with the London Plan "The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL."</p> <p>Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound:</p> <p>"Metropolitan Open Land (MOL) and Borough Open Land (BOL) will be protected, and where opportunities permit it will be enhanced in quality and/or extent. Development will not be permitted on MOL or BOL. Only in exceptional circumstances development may be permitted when..."</p>	<p>The protection and description of MOL and BOL is clear in this policy.</p>

The NSP is inconsistent with the Mayor of London's Draft London Plan which emphasises the need for increasing green and open spaces (specifically policies G3 and G4). Policy 56 however refers to restrictions on development on open spaces, rather than extending open space.

Policy 56 has not been positively prepared as the amount of new open space provided for in the site allocations is totally inadequate for the scale of development envisaged. There is no evidence that the Council has calculated the amount of new greenspace needed to provide adequately for the growing population, taking account of requirements of different ages within the population. Only four of the development opportunity sites in the Area Vision for Camberwell make provision for public open space. Many studies show the benefits of green space for people's mental and physical health, and all new developments should be built with this in mind; trees and other planting should be integral to the housing and planned alongside utilities and other infrastructure – not added as an afterthought. Southwark Council has recently consulted on its Kerbside Strategy which contains some promising ideas on open spaces, including encouraging 'parklets' and roadside trees and plants. Unfortunately, there doesn't seem to be a single mention of the Kerbside Strategy in the NSP. A more joined up vision for Southwark would improve the local environment, the health and happiness of Southwark residents, as well as promote a more coherent and cohesive vision for Southwark.

It would surely be more effective and consistent to have the Kerbside Strategy and the NSP as an integrated plan. The NSP also needs revision to ensure consistency with wider London objectives.

The Council should show the numbers of new residents planned in each area and the amount of green and open space provision, both in terms of area to be provided (in m²) and the nature of the provision.

Proposed change:

While Policy 56 is mainly in regards to improving and maintaining open spaces, the increase in Green infrastructure is mentioned in greater detail in P58. Our evidence base document Southwark Open Space Strategy 2013 outlines all of our strategies to achieving and improving open space access for Southwark's growing population. Southwark's Draft Kerbside Strategy was outline in 2017 and is included in the Sustainable Transport paper and Southwark's new Movement Plan (2017). Kerbside Strategy is particularly engaged with Transport and Housing, however is being implemented. Calculations of Open Space are included in the Evidence base paper (2013) and will be updated with an Open Space Addendum in (2019) following more recent developments. The proposed amendments to the plan have been noted however will not be added to the final document as they are repetitions of already existing planning requirements.

Introduce a sentence to establish that green space will be improved and extended to meet the needs of Southwark's growing population. State how the numbers of new people moving into new residential developments will be monitored and action taken to provide additional green space to address historic deficiencies and meet the needs of new residents.

Proposed change:

The wording of the Strategic Policy 6 and subsequent policies needs to be strengthened to ensure that the plan is effective. Wording to reinforce the importance of green space should be used, for example "We will lead the way in providing space for people to reconnect with nature, making people feel safe, creating cleaner streets, increasing recycling and reducing landfill waste".

Representation	Officer Response
<p data-bbox="188 252 470 284">P57: Open water space</p> <p data-bbox="188 293 353 357">Individual NSPPSV136.5</p> <p data-bbox="188 402 784 434">Inconsistent with Mayor of London’s London Plan</p> <p data-bbox="188 475 1108 577">The NSP Strategic Policy SP6 Cleaner Greener Safer and Policy P56 Open Space are unsound because they are inconsistent with the draft London Plan and internally inconsistent</p> <p data-bbox="188 619 1108 721">Strategic Policy SP6 and Policy P56 are inconsistent with the London Plan because the London Plan’s sections on green and open space emphasise the need for the extension as well as the protection of green and open space:</p> <ul data-bbox="188 724 1108 865" style="list-style-type: none"> • Policy G3 Metropolitan Open Land states that: The extension of MOL [Metropolitan Open Land] designations should be supported where appropriate. • Policy G4 Local green and open space states: The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space. C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required. <p data-bbox="188 1120 1108 1364">Southwark Council’s Open Space Strategy (OSS, 2013) noted that the projected growth in the borough’s population of 19% between 2012 -26 would increase the demand for green space. The OSS argued that because of the limited opportunities to create new open space, the focus would need to be on improving access to and the quality of existing green space. However, the proposed London Plan indicates a stronger presumption towards the creation of new open space.</p>	<p data-bbox="1140 402 2065 651">Policy G3 of the London Plan suggests that the extension of “MOL designations should be supported where appropriate” which is supported under P58: Green infrastructure point 2 “Large-scale development must provide new publically accessible open space and green links.” This provision of new open space is considered an “improv[ement] to the network of open spaces”, as described in point 4 of SP6, therefore being aligned with the Draft New London Plan.</p> <p data-bbox="1140 692 2065 1082">Policy G4 Local green and open spaces emphasising the “creation of new areas of publicly-accessible green and open space” is again supported under P58: Green infrastructure point 2 and point 4 of SP6. Guidance to inform strategic management of these policies is included in Southwark’s Open Space Strategy (2013). Included in this document is a needs assessment of local open spaces informing the identification and classification of open space is identified. P58 and P56 work to simultaneously protect and extend the designation of open space in the borough, where appropriate, with particular emphasis on “open space and green links” (P58.2). P56: Open space emphasises the protection in quality of open spaces by restricting the type of development that can occur on these designated areas.</p> <p data-bbox="1140 1123 2065 1225">To make this document align more clearly with Mayor of London Policy G4 Local Green and Open Space the change has been made to include the protection of open spaces in the introductory sentence of SP6.</p>

Ineffective in relation to SP2

NSP SP2 Social regeneration to revitalise neighbourhoods states that the SP will be achieved through, among other things, "providing green infrastructure and opportunities for healthy activities..." (p17). Southwark's Open Space Strategy (2013) recognised deficiencies in the provision of green space in parts of the borough where good quality open space can help address socio-economic issues (OSS, p16). Given these deficiencies, achieving SP2 will require the extension of green and open space and the creation of new green and open spaces.

Proposed change

The NSP SP6 Cleaner, Greener, Safer and P56 Open Space should include something like the proposed London Plan policy: "The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space".

NSP P56 should identify areas of the borough where new open space will be provided and the kinds of facilities needed for particular kinds of users, e.g. young children, older children, young adults, older adults.

Individual
NSPPSV136.7

Not effective

A very high proportion of NSP Policy 57, which purports to be about openness, is about filling up the open water space. The policy is unsound because it is ineffective in achieving what it says it is about, i.e. preserving and improving the openness of open water space.

Not justified

The policy focuses on the conditions in which uses that fill up the open space,

This policy has been strengthened in recognition of received comments and now also mentions that any "Any development that affects designated open water spaces must ensure that all safety and navigational impacts are minimized, as noted in part 1.8 of P22: River Thames." Track changes have been added to specify the different types of mooring potentials available including specific descriptors for "residential, commercial and visitor moorings" emphasising the wide variety of uses. The definition of 'underused' will be in line with the British Waterways definition.

for example with 'berths and moorings for other craft' will be permitted. It suggests that these are uses, 'that improve the use of the River Thames in underused open water spaces where they do not affect its openness or detract from its character.' However, it is hard to see how rows of boats moored along the edge of the Thames would not affect its openness.

In the phrase quoted above, there is no definition of 'underused'. Without a definition, any open water space without moorings could be said to be 'underused'. Yet wildlife, including birds, fish and mammals, use the Thames and are part of the biodiversity that many enlightened local authorities have worked hard over long years to restore. Many visitors and residents enjoy being beside open water and observing the movement of the water, the play of light and the activity of the creatures that use it.

Being beside water, seeing and hearing it, is known to have powerful restorative effects on people. While this quality of open water space is mentioned, there is no recognition that further extension of use of open water space for moorings for houseboats will impair or even completely take away these positive impacts. What is meant by and where is the justification for the statement that, 'Where water space is underused at present, new berths and moorings could increase the enjoyment of the River Thames.'? Whose enjoyment will be increased? And whose will be lost?

Inconsistent with Policy 22 River Thames

No evidence is given about the infrastructure required to service additional residential moorings along the Thames (e.g. facilities for removing waste, accessing the moorings from land, etc). This is mentioned in Policy 22 River Thames which refers to the need to "Avoid unacceptable harm or impacts on navigation, biodiversity, heritage assets or the existing character of the Thames Policy Area if proposing new mooring facilities" but not cross references to Policy 57. There is a risk that damage to the river banks and edges from intensified housing use could take a long time to restore.

Proposed change

- The policy needs to start with a definition of the 'openness' that it seeks to preserve and improve and how that may be affected by structures and constructions, including residential houseboats and other watercraft. The definition should also cover the openness required for wildlife to thrive.
 - The Policy should provide an explanation of how 'underuse' will be assessed (for example, is this underuse by people (not wildlife), underuse for housing, etc?)
- Evidence should be given of the infrastructure required for moorings and berths and the extent to which any further provision could be made sustainably in Southwark.

Organisation: Port of London Authority
NSPPSV143.11

11. Policy P57: Open Water Space

The PLA support the recognition that Southwark has several unique open water spaces on the Rotherhithe peninsula, and that these need to be maintained and improved, and also welcome reference to the high demand for berths and moorings that is not being met in Southwark and across London.

The PLA broadly support the aims of the policy, to ensure any new facilities or moorings do not affect the openness or distract from the character of the open water space, but consider that this policy must be expanded and can be made stronger. There must be reference in the policy that any development that affects designated open water spaces must ensure that all safety and navigational impacts are minimised, as noted in part 1.8 of policy P22.

In regards to the reference to berths and moorings for houseboats and other craft, the PLA consider that there must be a specific reference to all types of potential moorings, including residential, commercial and visitor moorings.

Track changes have been added to specify the different types of mooring options available. That means including specific descriptors for "residential, commercial and visitor moorings" emphasising the wide variety of uses. It also mentions that any "Any development that affects designated open water spaces must ensure that all safety and navigational impacts are minimized, as noted in part 1.8 of P22: River Thames."

<p>The PLAs Thames vision includes a number of goals regarding the creation of new, appropriate residential moorings accommodating suitable vessels, and realise new visitor moorings.</p>	
<p>Individual NSPPSV148.13</p> <p>NSP POLICY P57 OPEN WATER SPACE The policy is unsound as it makes no reference to evidence of underuse of water space or what assessment has been made of the infrastructure required to access and service additional moorings and berths.</p> <p>Houseboats should be supported as they contribute to meeting housing need, but the policy is unsound as it only sees houseboats as for leisure and facilities and amenities for the houseboats are not required in the policy.</p>	<p>Track changes have been added to specify the different types of mooring potentials available. That means including specific descriptors for "residential, commercial and visitor moorings" emphasising the wide variety of uses. It also mentions that any "Any development that affects designated open water spaces must ensure that all safety and navigational impacts are minimized, as noted in part 1.8 of P22: River Thames."</p>
<p>Individual NSPPSV321.2</p> <p>The importance of open water space in the borough for biodiversity is underplayed; there is no reference to this in the policy or the reasons.</p> <p>Recommend amending the Policy, part 1) to: "Ancillary features that positively contribute to the setting, accessibility, and quality of the open space and they do not affect is openness, ecological interest or detract from its character;"</p> <p>Recommend amending the Reasons (2nd sentence) to: "We will need to maintain and improve these spaces as well, to provide benefits associated with health and wellbeing, recreation, quality of life, biodiversity and cohesive communities."</p>	<p>These recommendations have been added to our policy.</p>

Representation	Officer Response
<p data-bbox="188 252 501 280">P58: Green infrastructure</p> <p data-bbox="188 293 676 357">Organisation: Bankside Residents Forum NSPPSV19.27</p> <p data-bbox="188 400 1106 464">The NSP is unsound because there is no definition of major developments or large scale major development.</p> <p data-bbox="188 507 1088 608">Without definitions it is not possible to ensure that planning applications make sufficient provision for greenspace either on the development site or as a contribution to other sites.</p> <p data-bbox="188 651 1115 788">Definition - There is inadequate definition of the development size described as major developments and large scale major development. Definitions could be linked to geographical size of area and density of proposed new development.</p> <p data-bbox="188 831 1111 968">Stewardship and maintenance funding - The additionality of green space and future management must be agreed via suitable planning legal agreements. Otherwise there is no follow through or legal grounds to take action on the planning requirements if not complied with.</p> <p data-bbox="188 1011 1099 1112">Green infrastructure – This will include green roofs and walls and will not be areas accessible by people. Benefits for health and wildlife should also include benefits for play and access for people and mobility.</p> <p data-bbox="188 1155 1106 1256">There are also long-term implication of installing and maintaining new green infrastructure that needs to be taken into account from the very start of any development proposal.</p>	<p data-bbox="1140 400 2065 932">Major developments are defined in our Glossary. Greenspace contributions are then assessed based off of these scales. Stewardship and maintenance are determined on the basis of service-level agreement, where Council owned development and green infrastructure are maintained by the Council, and private developments are privately maintained and services. Open space requirements are found in the Open Space Strategy report (2013). Green infrastructure refers to all green spaces and publically accessible Open Space is set out in P56. P58 is aligned with P69 as green infrastructure is used as a management technique to ensure Sustainable urban drainage systems are in place. This further emphasises developer's to use green infrastructure as mode of offsetting their surface water drainage requirements, set out based on development size. The importance of incorporating Green infrastructure as a mode of managing Surface water runoff is outlined in greater detail in our Strategic Flood Risk Assessment (2017). Please take a look at the Glossary on our website which takes further account</p>

The NSP is unsound because there is no definition of major developments or large scale major development.

Without definitions this it is not possible to ensure that planning applications make sufficient provision for greenspace either on the development site or as a contribution to other sites.

Definition - There is inadequate definition of the development size described as major developments and large scale major development. Definitions could be linked to geographical size of area and density of proposed new development.

Stewardship and maintenance funding - The additionality of green space and future management must be agreed via suitable planning legal agreements. Otherwise there is no follow through or legal grounds to take action on the planning requirements if not complied with.

Green infrastructure – This will include green roofs and walls and will not be areas accessible by people. Benefits for health and wildlife should also include benefits for play and access for people and mobility.

Proposed wording for the definitions could be:

Major development defined as more than 30 meters tall (aligning to the draft London Plan).

Large-scale major development defined as more than 30 meters tall and more than 50 dwellings (this is double the size of scheme defined as small by the draft London Plan).

Developments of under 50 dwellings should also have to provide green space

Major developments are defined in our Glossary. Greenspace contributions are then assessed based off of these scales. Stewardship and maintenance are determined on the basis of service-level agreement, where Council owned development and green infrastructure are maintained by the Council, and private developments are privately maintained and services. Open space requirements are found in the Open Space Strategy report (2013). Green infrastructure refers to all green spaces and publically accessible Open Space is set out in P56.

P58 is aligned with P69 as green infrastructure is used as a management technique to ensure Sustainable urban drainage systems are in place. This further emphasises developer's to use green infrastructure as mode of offsetting their surface water drainage requirements, set out based on development size. The importance of incorporating Green infrastructure as a mode of managing Surface water runoff is outlined in greater detail in our Strategic Flood Risk Assessment (2017). Please take a look at the Glossary on our website which takes further account

as well.

Policy 58 is unsound because it is not consistent with the SP6 on flooding and the importance of urban greening to tackle this risk. It is also not consistent with Policy 69 on Reducing flood risk.

SP6 stated objective is to use urban greening to reduce flood risk. This strategic goal should be applied more strongly to ensure that Policy 58 on major developments provides for green space which is used strategically to tackle flood risk as well as green infrastructure.

Much of Southwark is at risk from flooding: Thames river flooding, ground water (Policy 69)

Individual
NSPPSV136.8

The NSP Policy is not effective and not positively prepared because it fails to provide a mechanism for assessing the value of green infrastructure of different kinds and for establishing the amount and value of the green infrastructure to be created to balance the negative impact on vital ecosystems services of major developments.

The mayor of London's draft London Plan (p308) introduces the concept of 'urban greening' as a requirement for major developments. The definition of an Urban Greening Factor (UGF) which reflects the contribution of the green infrastructure to a range of services, from mitigating climate change impacts such as overheating and increased flood risk, to the capacity to absorb harmful air pollution and acting as a green corridor for wildlife. The mayor's UGF can be used to monitor the provision of green infrastructure and require improvements to be made.

No such mechanism is found in the NSP not does the document refer to the

Assessment of value of green infrastructure and balance of ecosystem services are addressed in the Southwark Open Space Strategy (2013). The designation of the Urban Greening Factor is a tool so it would not be in a policy. Policies set out requirements for planning permission, tools and methods of measuring the policy are set out in Supplementary Planning Documents. This would be where we would address the Urban Greening Factor tool.

mayor's UGF tool as a method that it would use while developing its own approach.

In fact, there is no assessment of the borough's green infrastructure needs, for example for flood alleviation, air pollution reduction or the provision of walking and cycling routes.

Without such an assessment it is not possible to ensure that planning applications make sufficient provision for green infrastructure either on development sites themselves or as a contribution to other sites.

The lack of forward thinking in planning for green infrastructure in Southwark is demonstrated by the approach to the development of cycle paths. In the densely populated parts of the borough such as Old Kent Road, where there is already an inadequate availability of green and open space, according to the Council's Open Space Strategy (2013), cycle paths are being routed through parks like Burgess Park. Evidence from studies in Burgess Park and elsewhere demonstrate that cycle routes tend to be used as commuting links even when they are designated quiet routes. This is detrimental to the safety and enjoyment of the park by other users, particularly vulnerable users like children and elderly people. As a result, the existing green infrastructure of parks and open spaces is expected to provide a range of uses that are not necessarily compatible with existing use or with each other.

Policy 58 is not effective as there are no maps of where new green corridors would be created in existing and new neighbourhoods.

The main maps in the NSP are the Area Vision Maps. These show no green corridors, only isolated green spaces and cycle routes. Note that there is no clear link between this policy and the cycling policy. The use of green space for cycle routes is rarely compatible with leisure and recreational uses because of the risk of collisions between cyclists and park users. This is even true of so-called Quiet Ways as cyclists will often be riding at speeds which make it difficult to avoid a collision with a pedestrian emerging suddenly on

<p>to a cycle route.</p> <p>Suggested changes In order to be effective, the NSP should identify a method of calculating the green infrastructure requirements created by major developments and for defining the scale and quality of the new green infrastructure to be created. The mayor of London’s Urban Greening Factor is an approach that Southwark Council could adopt while working out its own borough-specific tool.</p> <p>Policy 58 should be amended to show the network of green corridors, including any existing as well as proposed new green corridors.</p>	
<p>Individual NSPPSV148.14</p> <p>NSP P58 GREEN INFRASTRUCTURE The policy is not effective as there is no provision for the network of green corridors in existing neighbourhoods, nor for creating new green corridors.</p>	<p>These are set out in the Southwark Open Space Strategy (2013).</p>
<p>Organisation: Southwark Cyclists NSPPSV164.15</p> <p>There are no proposals setting out how green spaces could be improved or linked with green chains, in line with national and London policy(e.g. G1 in draft NLP) to integrate green areas, in order to improve connectivity for nature as well as improve the attractiveness of walking and cycling. The failure to consider space requirements for additional green infrastructure, such as by removing car parking and space for motor vehicles, and the locations where doing so would be most critical, means the plan risks being ineffective. In order to make this policy sound a map of potential green chains should be included and the following new policy inserted: A. All new development should enhance the network of green infrastructure</p>	<p>Green chains are mapped in the Southwark Open Space Strategy, which ensures that efficient patterns of green space is distributed in an as equitable as possible manner across the borough. See Page 43 of this document. There are a number of maps of green chains that answer this query.</p>

and green chains across the borough and seek to improve access to open space, particularly in areas of deficiency.

B. Development involving the loss of designated open space will not be permitted unless:

- i. There is compensatory contiguous replacement of better or equivalent quantity and quality of public open space and setting including facilities to enhance or diversify people’s experience of the open space; and
- ii. Replacement is in a location with better or equivalent access by walking, cycling or public transport; and
- iii. The quality of the remaining and replacement open space is not eroded by the proposed development; and
- iv. The community benefit of the proposed development significantly and demonstrably outweighs the harm caused by the loss of the open space.

All new development adjacent to existing Green Chains and Green Corridors must be developed in a way that contributes towards the green infrastructure network. In the areas of potential new Green Chains identified on the map, financial contributions may be sought to develop new Green Chains in the future.

Organisation: Southwark Friends of the Earth
NSPPSV165.5

P58- Green Infrastructure:-

- We most strongly believe now and always have done, that this policy must be given far greater priority than before. Far greater account should be taken of existing vegetation, we absolutely agree that the Council should apply further integration with the wider green infrastructure network, townscape and landscape increasing access for people and habitat connectivity.
- We support all this in principle but what does it all actually mean, without clarification it doesn't actually mean a lot.
- We support this proposal as we strongly believe that all new development

Comment noted. Green infrastructure and the natural environment is a Strategic Priority of the Council and the current policies aim to protect that. Notion of Climate Change is being urged through Strategic Direction of the Council, with an action plan to reach the targeted 2030 of Climate Emergency.

<p>must provide publicly-accessible ways and join up all open spaces and green links and create green corridors. This will help to make the borough a place where prospective residents will want to live, work, recreate and retire.</p> <ul style="list-style-type: none"> • We support this statement but to adapt to climate change and accommodate and allow species migration while supporting native and priority species there has to be a sea change in valuation and attitude towards trees. 	
<p>Individual NSPPSV176.4</p> <p>The NSP is unsound because it does not provide for replacement Other Open Space of both equivalent size and substantially better quality. Replacement green space should be of a greater size and better environmental quality. This would support the new draft London Plan 2017 objective to increase green space in London and increase green space in Southwark as an area of deficit.</p> <p>Proposed wording: ... replacement OOS of equivalent or greater size AND substantially better quality can be secured etc.</p> <p>The NSP is unsound because there is no definition of major developments or large scale major development.</p> <p>Without definitions it is not possible to ensure that planning applications make sufficient provision for green space either on the development site or as a contribution to other sites.</p> <p>Definition - There is inadequate definition of the development size described as major developments and large scale major development. Definitions could be linked to geographical size of area and density of proposed new development.</p>	<p>Major developments are defined in our Glossary. Greenspace contributions are then assessed based off of these scales. Stewardship and maintenance are determined on the basis of service-level agreement, where Council owned development and green infrastructure are maintained by the Council, and private developments are privately maintained and services. Open space requirements are found in the Open Space Strategy report (2013).</p> <p>Green infrastructure refers to all green spaces and publically accessible Open Space is set out in P56. P58 is aligned with P69 as green infrastructure is used as a management technique to ensure Sustainable urban drainage systems are in place. This further emphasises developer's to use green infrastructure as mode of offsetting their surface water drainage requirements, set out based on development size. The importance of incorporating Green infrastructure as a mode of managing Surface water runoff is outlined in greater detail in our Strategic Flood Risk Assessment (2017). Please take a look at the Glossary on our website which takes further account</p>

Stewardship and maintenance funding - The additionality of green space and future management must be agreed via suitable planning legal agreements. Otherwise there is no follow through or legal grounds to take action on the planning requirements if not complied with.

Green infrastructure – This will include green roofs and walls and will not be areas accessible by people. Benefits for health and wildlife should also include benefits for play and access for people and mobility.

Policy 58 is unsound because it is not consistent with the SP6 on flooding and the importance of urban greening to tackle this risk. It is also not consistent with Policy 69 on Reducing flood risk.

SP6 stated objective is to use urban greening to reduce flood risk. This strategic goal should be applied more strongly to ensure that Policy 58 on major developments provides for green space which is used strategically to tackle flood risk as well as green infrastructure.

Much of Southwark is at risk from flooding: Thames river flooding, ground water and surface water flooding (Policy 69)

Individuals

NSPPSV251.2

NSPPSV252.2

NSPPSV254.2

NSPPSV256.2

NSPPSV257.2

NSPPSV258.2

NSPPSV259.2

NSPPSV262.2

NSPPSV264.2

NSPPSV273.2

NSPPSV276.2
NSPPSV277.2
NSPPSV283.2
NSPPSV285.2
NSPPSV294.5

We suggest the Plan should be drawn up again to include:

1. A green grid, improving connectivity for wildlife and clean air for physical activity by greening corridors between our parks and green spaces with trees and other planting.

This is mapped out in our Southwark Open Space Strategy 2013.

Individual
NSPPSV260.2

It also is not doing much to make the borough greener both in terms of pollution but also in terms of tree planting, small/large park and green space creations etc. It has been documented by neuro scientists the link between green natural environment and mental health and wellbeing in people. Southwark has the opportunity here to trailblaze and inspire other boroughs to make changes that genuinely benefit the people and our living and working environment and also doing something new and forward thinking. Our society is struggling from bad air, ill mental health, stress, fatigue, obesity, to name a few. Prioritising cycling, green spaces and clean air will do more for Southwark, it's residents and it's reputation than anything else. Please it's crucial that the plans are redesigned in major ways.

The link between health and green space is noted in our evidence-base report "The Impact of Planning Policy on Health Outcomes and Health Inequalities" (2017).

Individual
NSPPSV266.2

<p>We need greening corridors between our parks and green spaces with more trees More cycling & walking routes and fewer cars. Please change the plan to create a better environment for people and not just car drivers (who would benefit in any case).</p>	<p>Cycle and Walking routes are designated in 2019 Movement Plan which is to be published in 2019, which provides an updated plan for Cycle and walking Routes P48, P49 and P50.</p> <p>Reduction of motor traffic is also addressed in our 2019 Movement Plan, along with strategies for parking in new developments (P52). Construction policies are subject to Building Control rather than Planning Policies included in the New Southwark Plan.</p>
<p>Individual NSPPSV267.3</p> <p>In regards to green spaces and environment it is my understanding that the policy does not take account of importance of green space to peoples well being, this ought to be stated in the first sentence of the plan.</p>	<p>Support noted.</p>
<p>Organisation: Friends of Peckham NSPPSV302.4</p> <p>The NSP Policy on Green infrastructure P58 is unsound because there is no assessment of the borough's green infrastructure needs, for example for flood alleviation, air pollution reduction or the provision of walking and cycling routes.</p> <p>Without this assessment this it is not possible to ensure that planning applications make sufficient provision for green infrastructure either on the development site or as a contribution to other sites. As a result, the existing green infrastructure of parks and open spaces is being looked to to provide a range of uses that are not necessarily compatible with existing use or with each other. One example is the expectation that cycling quiet routes should be accommodated within parks. Evidence from studies in Burgess Park and elsewhere demonstrate that cycle routes tend to be used as commuting links even when they are designated quiet routes. This is detrimental to the safety and enjoyment of the park by other users, particularly vulnerable users like</p>	<p>NSP P58: Green infrastructure is in line with Policy G1: Green Infrastructure of the New London Plan which requires provision of green features in the built environment which is addressed in Points 1 and 2 of the Policy. Secondly it requires green infrastructure strategies in terms of open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation, which can all be found in our evidence-base documents in the form of the Open Space Strategy 2013, Playing Pitch Strategy 2016, Strategic Flood Risk Assessment 2017 and the Biodiversity Action Plan 2013-2019.</p>

<p>children and elderly people.</p>	
<p>Individual NSPPSV316.10</p> <p>Policy 58 Major development Large scale major development Not Effective The NSP is unsound because there is no definition of major developments or large scale major development.</p> <p>Without definitions it is not possible to ensure that planning applications make sufficient provision for greenspace either on the development site or as a contribution to other sites.</p> <p>Definition - There is inadequate definition of the development size described as major developments and large scale major development. Definitions could be linked to geographical size of area and density of proposed new development.</p> <p>Stewardship and maintenance funding - The additionality of green space and future management must be agreed via suitable planning legal agreements. Otherwise there is no follow through or legal grounds to take action on the planning requirements if not complied with.</p> <p>Green infrastructure – This will include green roofs and walls and will not be areas accessible by people. Benefits for health and wildlife should also include benefits for play and access for people and mobility.</p> <p>Policy 58 Green infrastructure Not positively prepared</p> <p>Policy 58 is unsound because it is not consistent with the SP6 on flooding and</p>	<p>Major developments are defined in our Glossary. Greenspace contributions are then assessed based off of these values. Stewardship and maintenance are determined on the basis of service-level agreement, where Council owned development and green infrastructure are maintained by the Council, and private developments are privately maintained and services. Open space requirements are found in the Open Space Strategy report (2013). Green infrastructure refers to all green spaces and publically accessible Open Space is set out in the fact box after P56. P58 is aligned with P69 as green infrastructure is used as a management technique to ensure Sustainable urban drainage systems are in place. This further emphasises developer's to use green infrastructure as mode of offsetting their surface water drainage requirements, set out based on development size. The importance of incorporating Green infrastructure as a mode of managing Surface water runoff is outlined in greater detail in our Strategic Flood Risk Assessment (2017).</p>

<p>the importance of urban greening to tackle this risk. It is also not consistent with Policy 69 on Reducing flood risk.</p> <p>SP6 stated objective is to use urban greening to reduce flood risk. This strategic goal should be applied more strongly to ensure that Policy 58 on major developments provides for green space which is used strategically to tackle flood risk as well as green infrastructure.</p> <p>Much of Southwark is at risk from flooding: Thames river flooding, ground water (Policy 69)</p>	
<p>Individual NSPPSV31.14</p> <p>Not effective Not effective</p> <p>The NSP is unsound because there is no definition of major developments or large scale major development. Without definitions it is not possible to ensure that planning applications make sufficient provision for greenspace either on the development site or as a contribution to other sites. Definition - There is inadequate definition of the development size described as major developments and large scale major development. Definitions could be linked to geographical size of area and density of proposed new development. Stewardship and maintenance funding - The additionality of green space and future management must be agreed via suitable planning legal agreements. Otherwise there is no follow through or legal grounds to take action on the planning requirements if not complied with. Green infrastructure – This will include green roofs and walls and will not be areas accessible by people. Benefits for health and wildlife should also include benefits for play and access for people and mobility.</p>	<p>Major developments are defined in our Glossary. Greenspace contributions are then assessed based off of these values. Stewardship and maintenance are determined on the basis of service-level agreement, where Council owned development and green infrastructure are maintained by the Council, and private developments are privately maintained and services. Open space requirements are found in the Open Space Strategy report (2013). Green infrastructure refers to all green spaces and publically accessible Open Space is set out in the fact box after P56. P58 is aligned with P69 as green infrastructure is used as a management technique to ensure Sustainable urban drainage systems are in place. This further emphasises developer's to use green infrastructure as mode of offsetting their surface water drainage requirements, set out based on development size. The importance of incorporating Green infrastructure as a mode of managing Surface water runoff is outlined in greater detail in our Strategic Flood Risk Assessment (2017).</p>

Not positively prepared

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Much of Southwark is at risk from flooding: Thames river flooding, ground water (Policy 69)

The NSP is unsound because there is no definition of major developments or large scale major development.

Without definitions it is not possible to ensure that planning applications make sufficient provision for greenspace either on the development site or as a contribution to other sites.

Definition - There is inadequate definition of the development size described as major developments and large scale major development. Definitions could be linked to geographical size of area and density of proposed new development.

Stewardship and maintenance funding - The additionality of green space and future management must be agreed via suitable planning legal agreements.

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Green infrastructure – This will include green roofs and walls and will not be areas accessible by people. Benefits for health and wildlife should also include benefits for play and access for people and mobility.

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<p>with Policy 69 on Reducing flood risk. SP6's stated objective is to use urban greening to reduce flood risk. This strategic goal should be applied more strongly to ensure that Policy 58 on major developments provides for green space which is used strategically to tackle flood risk as well as green infrastructure. Much of Southwark is at risk from flooding: Thames river flooding, ground water (Policy 69)</p>	
<p>Individual NSPPSV218.10</p> <p>The NSP is unsound because it does not provide for replacement Other Open Space of both equivalent size and substantially better quality. Replacement green space should be of a greater size and better environmental quality. This would support the new draft London Plan 2017 objective to increase green space in London and increase green space in Southwark as an area of deficit.</p> <p>Proposed wording: ... replacement OOS of equivalent or greater size AND substantially better quality can be secured etc.</p> <p>The NSP is unsound because there is no definition of major developments or large scale major development.</p> <p>Without definitions it is not possible to ensure that planning applications make sufficient provision for greenspace either on the development site or as a contribution to other sites.</p> <p>Definition - There is inadequate definition of the development size described as major developments and large scale major development. Definitions could be linked to geographical size of area and density of proposed new development.</p>	<p>Major developments are defined in our Glossary. Greenspace contributions are then assessed based off of these values. Stewardship and maintenance are determined on the basis of service-level agreement, where Council owned development and green infrastructure are maintained by the Council, and private developments are privately maintained and services. Open space requirements are found in the Open Space Strategy report (2013). Green infrastructure refers to all green spaces and publically accessible Open Space is set out in the fact box after P56. P58 is aligned with P69 as green infrastructure is used as a management technique to ensure Sustainable urban drainage systems are in place. This further emphasises developer's to use green infrastructure as mode of offsetting their surface water drainage requirements, set out based on development size. The importance of incorporating Green infrastructure as a mode of managing Surface water runoff is outlined in greater detail in our Strategic Flood Risk Assessment (2017).</p>

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Much of Southwark is at risk from flooding: Thames river flooding, ground water (Policy 69)

Representation	Officer Response
<p data-bbox="188 252 398 284">P59: Biodiversity</p> <p data-bbox="188 293 676 357">Organisation: Bankside Residents Forum NSPPSV19.28</p> <p data-bbox="188 400 1097 504">This policy is not sound because it is not consistent with the current London Plan’s guidance on plan preparation as part of Policy 7.19 Biodiversity and access to nature which stated that Boroughs should:</p> <ul style="list-style-type: none"> <li data-bbox="188 544 1106 683">a use the procedures in the Mayor’s Biodiversity Strategy to identify and secure the appropriate management of sites of borough and local importance for nature conservation in consultation with the London Wildlife Sites Board. <li data-bbox="188 722 1113 786">b identify areas deficient in accessible wildlife sites and seek opportunities to address them <li data-bbox="188 826 1061 930">c include policies and proposals for the protection of protected/priority species and habitats and the enhancement of their populations and their extent via appropriate BAP targets <li data-bbox="188 970 1102 1042">d ensure sites of European or National Nature Conservation Importance are clearly identified. <li data-bbox="188 1082 1113 1185">e identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites. 	<p data-bbox="1137 400 2049 539">These are all included in the Southwark Biodiversity Action Plan (2013) and Southwark Sites of Interest for Nature Conservation (2016). The importance of maintaining a Biodiversity Strategy is fully agreed, with strategic targets and monitoring methods outlined.</p>
<p data-bbox="188 1230 719 1294">Organisation: Greendale Property Company NSPPSV71.6</p> <p data-bbox="188 1337 1079 1369">Draft Policy P59 (Biodiversity) states that development will be expected to</p>	<p data-bbox="1137 1337 1951 1369">What will be required of developers in order to support net gains in</p>

contribute to net gains in biodiversity. We support this approach in line with national planning policy but it is not clear how and when contributions will be required. In the interest of soundness (and to ensure that the policy is effective), this policy should be revised to ensure that contributions will be sought on the basis of an evidence-based approach. For example, where development will result in a loss or where development within a certain distance of sites of nature conservation value will have a direct impact on the designation.

To ensure that the policy is effective, we suggest that it is re-worded as follows:

“Development must contribute to net gains in biodiversity through:

- 1 Enhancing the nature conservation value of Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves (LNRs), designated and undesignated ancient woodland, populations of protected species and priority habitats/species identified in the United Kingdom, London or adopted Southwark Biodiversity Action Plan where development is proposed within or adjacent to a site of nature conservation and will have a direct impact on a designated site(s); and
- 2 Avoiding damage to SINCs and LNRs, populations of protected species and priority habitats/species. Where exceptionally, such developments are permitted adequate mitigation must be provided, or as a last resort, compensation for the harm to biodiversity; and
- 3 Including features such as green and brown roofs, green walls, soft landscaping, nest boxes and habitat restoration and expansion, improved green links and buffering of existing habitats.”

biodiversity is listed in points 1 to 3 of P59. Examples include enhancing the conservation value of SINCs, avoiding damage to SINCs, LNRs and species within. The examples for how to support point 1 and 2 are laid out in Point 3, to provide features such as green and brown roofs, green walls, soft landscaping, nest boxes and habitat restoration and expansion through improved green links and buffering of existing habitats. The precise methods used to support net gains in biodiversity will vary dependent on development context, and will be made an obligation in negotiation with the Council. The suggested change in wording has been considered.

Individual
NSPPSV136.9

Policy 59 is unsound because it is ineffective. The policy exists to enhance the

We cannot include the green grid map from the Open Space Strategy (2013)

borough's biodiversity and prevent damage, however it includes provision for developers to pay for damage to biodiversity: "Avoiding damage to SINCs, LNRs, populations of protected species and priority habitats/species. Where exceptionally, such developments are permitted adequate mitigation must be provided, or as a last resort, compensation for the harm to biodiversity" (p83)

Policy 59 is also ineffective because no links are made with Policy 58 on Green Infrastructure to show what kinds of green infrastructure are needed to effectively enhance biodiversity throughout the borough. The policy refers to provision for green links and buffering areas of biodiversity. But no provisions are made for the space to do this, limiting itself to a description of 'features for wildlife: "Regeneration, particularly in areas of natural deficiency, presents the opportunity to deliver net biodiversity gains benefitting local people by introducing features for wildlife as part of green infrastructure." (p83)

Loss of wildlife and biodiversity is a dramatic and chronic problem which will affect the life of future residents of Southwark. It is not something that can be solved by unspecified 'features' which developers could interpret, for example, as bird boxes. There is a need for a tool such as the Mayor of London's Urban Greening factor, which assesses the quality of green infrastructure and the services that types of infrastructure provide

Without specific places being identified, there is no evidence of linking up between sites or of links with other local authorities' biodiversity corridors. One example is the need for a map to show how biodiversity corridors to protect flora and fauna on either side of the railway line running between Southwark and Lewisham (Brockley to Honor Oak).

Suggested change

The NSP should include maps showing where space for green links and buffering for biodiversity is to be created or enhanced. These maps could be used to guide development proposals.

as this strategy is due to change during the course of the implementation of the New Southwark Plan.

Individual
NSPPSV148.15

NSP P59 BIODIVERSITY

The NSP should plan for space for green links and buffering for biodiversity, showing these on maps which can be used to guide development proposals. No evidence of linking up with plans of other local authority where biodiversity corridors link, e.g. protection of flora and fauna on either side of the railway line running between Southwark and Lewisham: Brockley – Honor Oak.

To make the Plan sound:-
SINCS should be listed in the Plan and open to comment.

The protected species and priority habitat that are relevant for Southwark should be listed.

These are set out in the Southwark Open Space Strategy (2013).

Organisation: Southwark Friends of the Earth
NSPPSV165.6

P59- Biodiversity:-

- We agree with your statement here that developers must contribute to net gains in biodiversity through the following statements here, and we are well aware of the reasons why, but we've lost so many habitats through wilful felling of trees knowing well that they are there for good reason.
- We cannot emphasise enough the importance the benefits of having nature on our doorstep: birdsong, the buzz of insects, bees to pollinate our plants for food and the perpetuation of many flowers through the seasons from spring to autumn. The buzz of summer lifts the body, soul, mind and spirit for all who live here. This is one of the best reasons for the encouragement of connectivity to nature.

Southwark's Biodiversity Action Plan (2013) aims to ensure the loss of habitats and tree felling is fully justified. This document is working to be updated to become more relevant to current development.

- We are very proud and blessed to have points 1, 2 and 3 on our doorstep.
- We also support and encourage our and more designated sites and those who've been awarded Green Flags, some several times, but we MUST take even greater account of our ancient and secondary woodlands.

Individual
NSPPSV321.3

Whilst we welcome the principle and thrust of this policy we believe it should be strengthened in line with the NPPF and London Plan policy.

We are interested to know what ancient woodland maybe undesignated in Southwark (Policy, Part 1), as all known ancient woodland in inner London boroughs is designated as a SINIC in some format.

NPPF para 117 states:

"To minimise impacts on biodiversity and geodiversity, planning policies should:

- plan for biodiversity at a landscape-scale across local authority boundaries;
- identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;"

We cannot see evidence of this in the policy or the proposals map.

Recommend amending the policy (part 2)

"Protecting and avoiding loss of or damage to SINICs, LNRs, populations of protected and priority habitats/species. Where exceptionally, such developments are permitted adequate mitigation must be provided, or as a last resort compensation for the harm to biodiversity; "

These recommendations have been added to our policy in the amended version of the New Southwark Plan. Ecological Networks has been mapped out in our Evidence base paper titled Southwark Biodiversity Action Plan (2013). These support NPPF para 117.

We recommend that the ecological networks within the borough and those relevant connecting to adjacent boroughs need to be mapped out as an appendix of the New Southwark Plan.

Representation	Officer Response
<p data-bbox="188 252 322 280">P60: Trees</p> <p data-bbox="188 293 577 357">Organisation: Aviva and Galliard NSPPSV18.13</p> <p data-bbox="188 400 1077 464">Policy P60 addresses the requirements to retain and enhance trees during development.</p> <p data-bbox="188 507 1099 611">It is requested that the loss of existing trees be treated with some flexibility. Although the unnecessary loss of important trees and landscaping is not promoted by either party, it will be required in certain instances.</p> <p data-bbox="188 654 1111 786">Flexibility in respect of the loss of existing trees and landscaping is requested where it is an essential part of facilitating major redevelopment or policy aspirations established within the Core Strategy, NSP or the emerging OKRAAP.</p>	<p data-bbox="1140 400 2056 935">The monitoring of trees is outlined in Southwark's Biodiversity Strategy (2013). The loss of existing trees is treated with sufficient flexibility in the current wording of P60. It suggests under point 7 that "Green Open Spaces are protected as described in P56. Southwark Open Space Strategy (2013) provides evidence that Southwark has a clear strategy for maintaining and improving green infrastructure and open space. These evidence-based documents will be further updated to reflect recent regeneration initiatives in the borough. Furthermore, P56 recognises the protection of Metropolitan Open Land (MOL) and Borough Open Land (BOL), which are identified in these policy documents. Trees are included in P59 and the council also includes a play strategy which suggests that children of a variety of ages should be catered for in the provision of open space. The existing policies therefore support the views of this comment." This allows for a variety of scenarios to be viewed on the basis of professional judgement from our Urban Forester when it is appropriate to remove or keep trees.</p>
<p data-bbox="188 978 367 1042">Individual NSPPSV110.11</p> <p data-bbox="188 1086 1037 1190">Cleaner, Greener, Safer Policy P60 (Trees) is sound but should also consider the habitat loss for insects, birds and mammals when trees are felled and removed.</p>	<p data-bbox="1140 1086 1966 1118">Support noted, habitat loss is further considered in P59: Biodiversity.</p>

P60 -Trees:-

- We are extremely worried and object to the persistent felling of healthy trees, they provide a vital service which none of us can ever dispense to the same degree.
- There is very little notice taken of the fact that when trees are removed it also releases emissions, trees are known as carbon sinks when trees are left in situ for as long as possible.

When a new planting scheme is started it takes many years for that to establish and restore the canopy once removed, but trees are removed in such haste, it's hard to stop the emissions. Hardly even a new planting regime ever matches the volume of trees taken out, it's never like for like and one tree for one tree is not taken account of with the rate of survival for the new planting scheme. To ensure a even a reasonable amount of replants it has to be 5-1 taken. Once the canopy is lost that means many native and visiting species are homeless for a very long time because some species need a wide range of territory to live.

There are 6 legitimate reasons why trees should be removed:

Dead: but they can be recycled as part of the natural decaying process and become homes for wildlife which feed on dead trees

Diseased: these should be removed now because many have diseases, e.g. Ash Die Back, etc. to prevent others from catching the diseases

Dying: from other diseases

Dangerous: where they become a danger to passing pedestrians and far too large for narrow pavements

Far too close to houses causing subsidence, cracking walls and following drains in their search for water in times of drought, some needing far more water than others

The Council would be far better off listening to local communities and be much clearer about what the local communities want and need to improve their local environment, no-one knows their needs better than the local

Information on Southwark's Tree Strategy can be found in the Southwark Biodiversity Action Plan (2013) in point 3.6. The importance of trees to protecting the climate is fully recognised in the New Southwark Plan and background papers. For this reason, trees that are removed go through an intense assessment process known as an Arboriculture report, to ensure that loss to the overall biodiversity of the area is mitigated. It is recognised that dialogue over the importance of the natural environment needs to be improved through teaching and community initiatives aim to do this.

communities.

Representation	Officer Response
<p data-bbox="188 252 338 284">P62: Energy</p> <p data-bbox="188 293 580 357">Organisation: Firmdale Holdings NSPPSV59.6</p> <p data-bbox="188 400 1104 539">Draft Policy P62 requires major developments to reduce carbon dioxide emissions on-site, with non-residential development required to reduce carbon emissions by a minimum of 40% on 2013 Buildings Regulations Part L up to 2019 and be zero carbon (100%) from 1 January 2019 onward.</p> <p data-bbox="188 580 1115 900">Whilst the principles of the policy are supported, it is unclear why the draft policy requires carbon emissions to achieve a minimum of 40% on 2013 Buildings Regulations Part L up to 2019, as this deviates from existing London Plan Policy 5.2 (which requires a 40% improvement on 2010 Building Regulations Part L) and Draft London Plan Policy SI2 (which requires a 35% improvement on 2013 Building Regulations Part L) which is the same requirement detailed in the Mayor of London’s Sustainable Design and Construction SPD (2014) and “Guidance on Preparing Energy Assessments (2016).”</p> <p data-bbox="188 941 1108 1114">Accordingly, Policy P62 as currently drafted is considered to be ‘unsound’ in that it is not ‘consistent’ with either the existing or the emerging London Plan. Furthermore, the alternative approach is not adequately justified on the basis of any evidence to support a more onerous requirement for carbon reductions from major non-residential development until 2019.</p> <p data-bbox="188 1155 1115 1294">Change sought – It is requested that paragraph 2.2 of Policy P62 be amended to refer to the same carbon reduction requirement for non-residential development until 2019 as the emerging London Plan, i.e. a 35% reduction compared to 2013 Buildings Regulations Part L, as follows:</p> <p data-bbox="188 1335 338 1367">P62: Energy</p>	<p data-bbox="1140 293 2069 466">Southwark supports and strengthens the minimum reduction in carbon emissions that is guided by the London Plan (both proposed and adopted). As P62 is stronger than both of these policies by a 5% increased target, it is sound and consistent. Furthermore, an updated background paper for Energy and Flooding will be provided to provide further evidence to this decision.</p> <p data-bbox="1140 507 2047 791">Southwark has declared a climate emergency, with targets to significantly lower carbon emissions by 2030, which is 20 years more ambitious than the targets set out by the Mayor. For this reason, the environmental policies need to reflect these ambitions. Building regulation and environmental standards will be strengthening in our Supplementary Planning documents both locally and nationally, in respect to reduced carbon emissions standards, and it is therefore important that the New Southwark Plan is relevant and can be put into place for the many years to come.</p> <p data-bbox="1140 833 2069 1005">The London Plan point 9.2.5 suggests that <i>at least</i> an “on site reduction of at least 35 per cent beyond baseline of part L of the current Build Regulations”. It follows up by saying “the minimum improvement over the Target Emission Rate (TER) will increase over a period of time in order to achieve the zero-carbon London” a long with an increased recommended carbon offset price.</p> <p data-bbox="1140 1046 2069 1219">In conclusion a more ambitious target and a higher price which reflects future policy direction (i.e. more stringent carbon targets) and which allows a range of measures to be supported that is not restricted to one category, would enable a consistent price for developers and flexibility for Southwark in how it spends its fund.</p>

<p>... Major development must reduce carbon dioxide emissions on-site by:</p> <p>2.1 100% on 2013 Building Regulations Part L standards for residential development; and</p> <p>2.2 A minimum of 35% on 2013 Buildings Regulations Part L up to 2019, and zero carbon (100%) from 1 January 2019 onward, for non-residential developments.</p> <p>3 Any shortfall against carbon emissions reduction requirements must be secured off-site through planning obligations or a financial contribution....</p>	
<p>Organisation: Home Builders Federation (HBF) NSPPSV84.8</p> <p>The policy is unsound because it is unjustified and ineffective.</p> <p>We are not clear what is meant by a “100% on 2013 Building Regulations Part L”. Is this a 100% improvement on current Part L?</p> <p>A 100% improvement suggests zero carbon homes. We do not think this is feasible, mainly because there is no definition of what constitutes ‘zero carbon homes’. If the Council requires contributions to so called ‘allowable solutions’ then it ought to say this and how this would be done. Even so, this would not necessarily mean that homes are being constructed to a zero carbon standard. This would be misleading.</p> <p>The HBF strongly opposes the Mayor’s position on zero carbon. As we recently commented in our response to the National Infrastructure Commission’s consultation on the National Infrastructure Assessment, standardisation is the key to success in this as well as other areas of policy. We need to avoid every planning authority in the country specifying its own approach to energy efficiency. This militates against economies of scale for both product manufacturers and suppliers and developers. There should be a single standard for the whole country and local authorities must be made to</p>	<p>Southwark supports and strengthens the minimum reduction in carbon emissions that is guided by the London Plan (both proposed and adopted). As P62 is stronger than both of these policies by a 5% increased target, it is sound and consistent. Furthermore, an updated background paper for Energy and Flooding will be provided to provide further evidence to this decision.</p> <p>Southwark has declared a climate emergency, with targets to significantly lower carbon emissions by 2030, which is 20 years more ambitious than the targets set out by the Mayor. For this reason, the environmental policies need to reflect these ambitions. Building regulation and environmental standards will be strengthening in our Supplementary Planning documents both locally and nationally, in respect to reduced carbon emissions standards, and it is therefore important that the New Southwark Plan is relevant and can be put into place for the many years to come.</p> <p>The London Plan point 9.2.5 suggests that <i>at least</i> an “on site reduction of at least 35 per cent beyond baseline of part L of the current Build Regulations”. It follows up by saying “the minimum improvement over the Target Emission Rate (TER) will increase over a period of time in order to achieve the zero-carbon London” a long with an increased recommended carbon offset price.</p>

adhere to this. The Government had set Part L of the Building Regulations at the 2013 level (through Fixing the Foundations, HM Treasury, July 2015), because of the difficulty it had in defining allowable solutions to enable its zero carbon target to be achieved from 2016 onwards. Unfortunately, this has not stopped some areas of the country from ignoring this direction of national government and they have set zero carbon targets. This includes the Greater London area and Brighton & Hove. We need much more standardisation and no latitude allowed to combined authorities and local authorities to deviate from national standards. We consider this an important message. The Building Regulations is not an area that combined authorities and local authorities should be allowed to interfere in by creating their own local standards.

In conclusion a more ambitious target and a higher price which reflects future policy direction (i.e. more stringent carbon targets) and which allows a range of measures to be supported that is not restricted to one category, would enable a consistent price for developers and flexibility for Southwark in how it spends its fund.

Organisation: LGIM Real Assets (LGIM RA)
NSPPSV109.4

Policy P62: Energy

Draft Policy P62 requires major developments to reduce carbon dioxide emissions on-site, with non-residential development required to reduce carbon emissions by a minimum of 40% on 2013 Buildings Regulations Part L up to 2019 and be zero carbon (100%) from 1 January 2019 onward.

Whilst the principles of the policy are supported, it is unclear why the draft policy requires carbon emissions to achieve a minimum of 40% on 2013 Buildings Regulations Part L up to 2019, as this deviates from existing London Plan Policy 5.2 (which requires a 40% improvement on 2010 Building Regulations Part L) and Draft London Plan Policy SI2 (which requires a 35% improvement on 2013 Building Regulations Part L) which is the same requirement detailed in the Mayor of London's Sustainable Design and Construction SPD (2014) and "Guidance on Preparing Energy Assessments (2016)."

Accordingly, Policy P62 as currently drafted is considered to be 'unsound' in that it is not 'consistent' with either the existing or the emerging London Plan. Furthermore, the alternative approach is not adequately justified on

Southwark supports and strengthens the minimum reduction in carbon emissions that is guided by the London Plan (both proposed and adopted). As P62 is stronger than both of these policies by a 5% increased target, it is sound and consistent. Furthermore, an updated background paper for Energy and Flooding will be provided to provide further evidence to this decision.

Southwark has declared a climate emergency, with targets to significantly lower carbon emissions by 2030, which is 20 years more ambitious than the targets set out by the Mayor. For this reason, the environmental policies need to reflect these ambitions. Building regulation and environmental standards will be strengthening in our Supplementary Planning documents both locally and nationally, in respect to reduced carbon emissions standards, and it is therefore important that the New Southwark Plan is relevant and can be put into place for the many years to come.

The London Plan point 9.2.5 suggests that *at least* an "on site reduction of at least 35 per cent beyond baseline of part L of the current Build Regulations".

<p>the basis of any evidence to support a more onerous requirement for carbon reductions from major non-residential development until 2019.</p> <p>Change sought – It is requested that paragraph 2.2 of Policy P62 be amended to refer to the same carbon reduction requirement for non-residential development until 2019 as the emerging London Plan, i.e. a 35% reduction compared to 2013 Buildings Regulations Part L, as follows:</p> <p>P62: Energy</p> <p>... Major development must reduce carbon dioxide emissions on-site by:</p> <p>2.1 100% on 2013 Building Regulations Part L standards for residential development; and</p> <p>2.2 A minimum of 35% on 2013 Buildings Regulations Part L up to 2019, and zero carbon (100%) from 1 January 2019 onward, for non-residential developments.</p> <p>3 Any shortfall against carbon emissions reduction requirements must be secured off-site through planning obligations or a financial contribution....</p>	<p>It follows up by saying “the minimum improvement over the Target Emission Rate (TER) will increase over a period of time in order to achieve the zero-carbon London” a long with an increased recommended carbon offset price.</p> <p>In conclusion a more ambitious target and a higher price which reflects future policy direction (i.e. more stringent carbon targets) and which allows a range of measures to be supported that is not restricted to one category, would enable a consistent price for developers and flexibility for Southwark in how it spends its fund.</p>
<p>Organisation: Royal Mail Pension Trustees limited NSPPSV155.7</p> <p>Policy P62: Energy</p> <p>Draft Policy P62 requires major developments to reduce carbon dioxide emissions on-site, with non-residential development required to reduce carbon emissions by a minimum of 40% on 2013 Buildings Regulations Part L up to 2019 and be zero carbon (100%) from 1 January 2019 onward.</p> <p>Whilst the principles of the policy are supported, it is unclear why the draft policy requires carbon emissions to achieve a minimum of 40% on 2013 Buildings Regulations Part L up to 2019, as this deviates from existing London Plan Policy 5.2 (which requires a 40% improvement on 2010 Building Regulations Part L) and Draft London Plan Policy SI2 (which requires a 35% improvement on 2013 Building Regulations Part L) which is the same</p>	<p>Southwark supports and strengthens the minimum reduction in carbon emissions that is guided by the London Plan (both proposed and adopted). As P62 is stronger than both of these policies by a 5% increased target, it is sound and consistent. Furthermore, an updated background paper for Energy and Flooding will be provided to provide further evidence to this decision.</p> <p>Southwark has declared a climate emergency, with targets to significantly lower carbon emissions by 2030, which is 20 years more ambitious than the targets set out by the Mayor. For this reason, the environmental policies need to reflect these ambitions. Building regulation and environmental standards will be strengthening in our Supplementary Planning documents</p>

<p>requirement detailed in the Mayor of London’s Sustainable Design and Construction SPD (2014) and “Guidance on Preparing Energy Assessments (2016).”</p> <p>Accordingly, Policy P62 as currently drafted is considered to be ‘unsound’ in that it is not ‘consistent’ with either the existing or the emerging London Plan. Furthermore, the alternative approach is not adequately justified on the basis of any evidence to support a more onerous requirement for carbon reductions from major non-residential development until 2019.</p> <p>Change sought – It is requested that paragraph 2.2 of Policy P62 be amended to refer to the same carbon reduction requirement for non-residential development until 2019 as the emerging London Plan, i.e. a 35% reduction compared to 2013 Buildings Regulations Part L, as follows:</p> <p>P62: Energy ... Major development must reduce carbon dioxide emissions on-site by: 2.1 100% on 2013 Building Regulations Part L standards for residential development; and 2.2 A minimum of 35% on 2013 Buildings Regulations Part L up to 2019, and zero carbon (100%) from 1 January 2019 onward, for non-residential developments. 3 Any shortfall against carbon emissions reduction requirements must be secured off-site through planning obligations or a financial contribution....</p>	<p>both locally and nationally, in respect to reduced carbon emissions standards, and it is therefore important that the New Southwark Plan is relevant and can be put into place for the many years to come.</p> <p>The London Plan point 9.2.5 suggests that <i>at least</i> an “on site reduction of at least 35 per cent beyond baseline of part L of the current Build Regulations”. It follows up by saying “the minimum improvement over the Target Emission Rate (TER) will increase over a period of time in order to achieve the zero-carbon London” a long with an increased recommended carbon offset price.</p> <p>In conclusion a more ambitious target and a higher price which reflects future policy direction (i.e. more stringent carbon targets) and which allows a range of measures to be supported that is not restricted to one category, would enable a consistent price for developers and flexibility for Southwark in how it spends its fund.</p>
<p>Organisation: Strathclyde Regional Pension Fund NSPPSV174.7</p> <p>Draft Policy P62 requires major developments to reduce carbon dioxide emissions on-site, with non-residential development required to reduce carbon emissions by a minimum of 40% on 2013 Buildings Regulations Part L up to 2019 and be zero carbon (100%) from 1 January 2019 onward. Whilst the principles of the policy are supported, it is unclear why the draft</p>	<p>Southwark supports and strengthens the minimum reduction in carbon emissions that is guided by the London Plan (both proposed and adopted). As P62 is stronger than both of these policies by a 5% increased target, it is sound and consistent. Furthermore, an updated background paper for Energy and Flooding will be provided to provide further evidence to this decision.</p>

policy requires carbon emissions to achieve a minimum of 40% on 2013 Buildings Regulations Part L up to 2019, as this deviates from existing London Plan Policy 5.2 (which requires a 40% improvement on 2010 Building Regulations Part L) and Draft London Plan Policy SI2 (which requires a 35% improvement on 2013 Building Regulations Part L) which is the same requirement detailed in the Mayor of London’s Sustainable Design and Construction SPD (2014) and “Guidance on Preparing Energy Assessments (2016).”

Accordingly, Policy P62 as currently drafted is considered to be ‘unsound’ in that it is not ‘consistent’ with either the existing or the emerging London Plan. Furthermore, the alternative approach is not adequately justified on the basis of any evidence to support a more onerous requirement for carbon reductions from major non-residential development until 2019.

Change sought – It is requested that paragraph 2.2 of Policy P62 be amended to refer to the same carbon reduction requirement for non-residential development until 2019 as the emerging London Plan, i.e. a 35% reduction compared to 2013 Buildings Regulations Part L, as follows:

P62: Energy

... Major development must reduce carbon dioxide emissions on-site by:

2.1 100% on 2013 Building Regulations Part L standards for residential development; and

2.2 A minimum of 35% on 2013 Buildings Regulations Part L up to 2019, and zero carbon (100%) from 1 January 2019 onward, for non-residential developments.

3 Any shortfall against carbon emissions reduction requirements must be secured off-site through planning obligations or a financial contribution....

We trust that these representations will be given due consideration in the preparation of the emerging New Southwark Plan.

Southwark has declared a climate emergency, with targets to significantly lower carbon emissions by 2030, which is 20 years more ambitious than the targets set out by the Mayor. For this reason, the environmental policies need to reflect these ambitions. Building regulation and environmental standards will be strengthening in our Supplementary Planning documents both locally and nationally, in respect to reduced carbon emissions standards, and it is therefore important that the New Southwark Plan is relevant and can be put into place for the many years to come.

The London Plan point 9.2.5 suggests that *at least* an “on site reduction of at least 35 per cent beyond baseline of part L of the current Build Regulations”. It follows up by saying “the minimum improvement over the Target Emission Rate (TER) will increase over a period of time in order to achieve the zero-carbon London” a long with an increased recommended carbon offset price.

In conclusion a more ambitious target and a higher price which reflects future policy direction (i.e. more stringent carbon targets) and which allows a range of measures to be supported that is not restricted to one category, would enable a consistent price for developers and flexibility for Southwark in how it spends its fund.

Representation	Officer Response
<p data-bbox="188 252 443 284">P63: Reducing waste</p> <p data-bbox="188 293 340 357">Individual NSPPSV90.1</p> <p data-bbox="188 399 1115 539">I have a comment, however, relating to the bureaucratic regime currently in place for waste disposal visits to your old Kent Road site. These need to be eased inaccessibility makes fly-tipping much more appealing as evidenced by big rubbish being dumped opposite my house!</p>	<p data-bbox="1140 399 2069 753">Adequate waste facilities for all land uses are required by P63: Reducing waste. This includes in point 1.1 the requirement for the waste management hierarchy to be applied during construction. In point 1.2, provide adequate recycling, composting and waste disposal collection and storage facilities on-site and where this is not possible, point 1.3 addresses the requirement for a “suitable off-site waste management strategy that does not adversely impact amenity, access or the environment, where on-site waste management provision is not possible”. This ensures that all measures are put in place to eliminate the occurrence of unlawful waste disposal activities such as fly-tipping.</p>
<p data-bbox="188 798 353 861">Individual NSPPSV91.81</p> <p data-bbox="188 903 663 970">Objection to failure to safeguard waste management sites</p> <p data-bbox="188 976 353 1008">Objection 63.</p> <p data-bbox="188 1015 1075 1046">We object to the failure to safeguard waste management sites in the NSP.</p> <p data-bbox="188 1053 837 1085">This is unsound in relation to London Plan policy 9.9.2.</p> <p data-bbox="188 1091 1102 1295">London Plan policy S19 requires existing waste sites be safeguarded and retained in waste management use and states that any waste site release should be part of a plan-led process and that sites should only be released to other land uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput of the site proposed to be lost.</p> <p data-bbox="188 1302 1093 1369">London Plan para 9.8.7 states that boroughs should examine in detail how waste capacity can be delivered at the local level through site allocations in</p>	<p data-bbox="1140 903 2069 1225">Objection noted. Waste management is safeguarded through our Integrated Waste Management Facility, which works in a joint South-East London Waste Group Partnership with other London boroughs to manage our designated apportionment. Further sites are allocated as strategic sites; however calculations have been made in the Joint southeast London Waste Planning Technical Paper (2017) that show that waste management sites are sufficiently maintained. This technical paper outlines how our waste management policy P64 is sound with both NPPF and London Plan requirements.</p>

<p>Development Plans to meet their apportionments, and should aim to meet their waste apportionment as a minimum, and that they should identify suitable additional sites for waste including waste transfer sites where practicable.</p> <p>NPPF para 157 states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation.</p> <p>NPPF para 157 requires that Local Plans should Indicate land-use designations on a proposals map;</p> <p>NPPF para 14 requires Local Plans to meet objectively assessed needs.</p> <p>NPPF para 154 states that Local Plans should set out clear policies on what will or will not be permitted and where. .</p> <p>London Plan para 9.8.8 requires that large-scale redevelopment opportunities and redevelopment proposals should incorporate waste management facilities within them. To meet this requirement references should be made to the requirement to retain and to incorporate in the site allocation policies for sites including NSP67, NSP89, NSP68.</p>	
<p>Individual NSPPSV128.81</p> <p>Objection to failure to safeguard waste management sites Objection 63. We object to the failure to safeguard waste management sites in the NSP. This is unsound in relation to London Plan policy 9.9.2. London Plan policy S19 requires existing waste sites be safeguarded and retained in waste management use and states that any waste site</p>	<p>Objection noted. Waste management is safeguarded through our Integrated Waste Management Facility, which works in a joint South-East London Waste Group Partnership with other London boroughs to manage our designated apportionment. Further sites are allocated as strategic sites; however calculations have been made in the Joint southeast London Waste Planning Technical Paper (2017) that show that waste management sites are sufficiently maintained. This technical paper outlines how our waste</p>

<p>release should be part of a plan-led process and that sites should only be released to other land uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput of the site proposed to be lost.</p> <p>London Plan para 9.8.7 states that boroughs should examine in detail how waste capacity can be delivered at the local level through site allocations in Development Plans to meet their apportionments, and should aim to meet their waste apportionment as a minimum, and that they should identify suitable additional sites for waste including waste transfer sites where practicable.</p> <p>NPPF para 157 states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation.</p> <p>NPPF para 157 requires that Local Plans should Indicate land-use designations on a proposals map;</p> <p>NPPF para 14 requires Local Plans to meet objectively assessed needs.</p> <p>NPPF para 154 states that Local Plans should set out clear policies on what will or will not be permitted and where. .</p> <p>London Plan para 9.8.8 requires that large-scale redevelopment opportunities and redevelopment proposals should incorporate waste management facilities within them. To meet this requirement references should be made to the requirement to retain and to incorporate in the site allocation policies for sites including NSP67, NSP89, NSP68.</p>	<p>management policy P64 is sound with both NPPF and London Plan requirements.</p>
<p>Organisation: Port of London Authority NSPPSV143.12</p> <p>12. Policy P63: Reducing Waste</p> <p>The PLA consider that it must be stated in the policy that the development of</p>	<p>Waste management for sites located close to the river do not use the River for transportation of construction material and waste, therefore no explicit mention needs to be made in the New Southwark Plan outlining this.</p>

sites in close proximity to the Thames must consider the use of the River for the transportation of construction materials and waste, in line with current London Plan policy 5.18 and 6.14, as well as policies in the 2017 consultation draft London Plan including S18, S15 and T7, as well as the PLAs Thame Vision which aims to move more goods and materials off roads and onto the river, taking 400,000 lorry trips off the regions roads by 2035.

Organisation: Vital OKR
NSPPSV205.39

Objection to failure to safeguard waste management sites
Objection 63.

We object to the failure to safeguard waste management sites in the NSP. This is unsound in relation to London Plan policy 9.9.2.

London Plan policy S19 requires existing waste sites be safeguarded and retained in waste management use and states that any waste site release should be part of a plan-led process and that sites should only be released to other land uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput of the site proposed to be lost.

London Plan para 9.8.7 states that boroughs should examine in detail how waste capacity can be delivered at the local level through site allocations in Development Plans to meet their apportionments, and should aim to meet their waste apportionment as a minimum, and that they should identify suitable additional sites for waste including waste transfer sites where practicable.

NPPF para 157 states that Local Plans should identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation.

NPPF para 157 requires that Local Plans should Indicate land-use designations on a proposals map;

Objection noted. Waste management is safeguarded through our Integrated Waste Management Facility, which works in a joint South-East London Waste Group Partnership with other London boroughs to manage our designated apportionment. Further sites are allocated as strategic sites; however calculations have been made in the Joint southeast London Waste Planning Technical Paper (2017) that show that waste management sites are sufficiently maintained. This technical paper outlines how our waste management policy P64 is sound with both NPPF and London Plan requirements.

NPPF para 14 requires Local Plans to meet objectively assessed needs. NPPF para 154 states that Local Plans should set out clear policies on what will or will not be permitted and where. London Plan para 9.8.8 requires that large-scale redevelopment opportunities and redevelopment proposals should incorporate waste management facilities within them. To meet this requirement references should be made to the requirement to retain and to incorporate in the site allocation policies for sites including NSP67, NSP89, NSP68.

Individual
NSPPSV327.12

The council needs to ensure that Rubbish is collected promptly from Camberwell Church Street. This is a disgusting street full of large, unemptied bins and black bin bags pecked by crows and rubbish sprawling over pavements. There needs to be a policy to stop this. This Waste can have negative impacts on health and wellbeing, amenity and the environment and makes locals have no pride in their main street

Ensure businesses take rubbish out at the appropriate time and not allow bins to remain unemptied.

Adequate waste facilities for all land uses are required by P63: Reducing waste. This includes in point 1.1 the requirement for the waste management hierarchy to be applied during construction. In point 1.2, provide adequate recycling, composting and waste disposal collection and storage facilities on-site and where this is not possible, point 1.3 addresses the requirement for a “suitable off-site waste management strategy that does not adversely impact amenity, access or the environment, where on-site waste management provision is not possible”. This ensures that all measures are put in place to eliminate the occurrence of unlawful waste disposal activities.

Representation	Officer Response
<p data-bbox="188 252 504 284">P66: Improving air quality</p> <p data-bbox="188 293 555 357">Organisation: Better Bankside NSPPSV22.9</p> <p data-bbox="188 402 1111 612">Policy P66 sets out the Plan’s policy requirement regarding air quality. Although there is a lot of focus on domestic impacts, which we support, the policy should outline additional measures for tackling the issue, not solely in relation to boiler types. These could include repairing and/or replacing wood window frames, etc. There should also be a recognition of the impact of behavioural change as well as physical infrastructure improvements.</p> <p data-bbox="188 657 1111 826">In both instances, the Submission document fails to signify the role of the Council in achieving these objectives. Nor does the Plan divulge a strategy on how the Council intends to tackle the problems with replacing their boilers for Council-owned properties. Information on feasibility regarding how this will be funded, or potential funding sources would be welcome.</p> <p data-bbox="188 871 1111 1040">Additionally, there is little detail relating to vehicle emissions and the causes of this – i.e. personal deliveries / businesses-related deliveries. There is also no real mention as to how these will be tackled. We would therefore recommend that Policy P66 acknowledges the issues surrounding vehicle use and air quality and includes an approach to address them.</p>	<p data-bbox="1140 402 2056 826">Our Air Quality Strategy and Action Plan (2017) outline specific methodologies to tackle air quality issues beyond those mentioned in P66. It will be added to the amended document that Air quality improvement is not limited to the methodologies currently outlined in P66. Under “Reasons” P66 does identify a number of off-setting measures such as green planting/walls, upgrading to combustion plant, retrofitting abatement technology for vehicles and flues, as well as exposure reduction. Furthermore, reasons for other SP6 policies identify their importance in contributing to improved air quality, as seen in for instance P60: Trees which identifies the importance of tree planting in improving air quality measures. The Air Quality Strategy and Action Plan (2017) outline the importance of both behavioural change and physical infrastructure improvement.</p> <p data-bbox="1140 871 2056 1008">SP6 identifies the role the council will take to “lead the way... in improving our natural environment” which includes improvements to air quality. The strategy the council will take for council-owned properties is included in the Air Quality Strategy and Action Plan (2017).</p> <p data-bbox="1140 1050 2056 1152">Vehicle use and air quality are addressed in SP5: healthy active lives and encourages a reduction in the number of motor vehicle journeys (point 4 P47: Highways Impacts).</p>
<p data-bbox="188 1197 504 1260">Organisation: LB Lambeth NSPPSV333.5</p> <p data-bbox="188 1305 1111 1369">In addition we are conscious of the urgency to coordinate efforts around managing the impact of construction during this period of development, and</p>	<p data-bbox="1140 1197 2056 1369">We require detailed construction management plans for development to mitigate adverse impacts and the construction phase of development is included in our highways impacts policy, reducing waste policy, hazardous substances policy and now specifically mentioned in the reasons to the air quality policy.</p>

<p>in particular to mitigate against air pollution. Policy P66 on Improving air quality policy does not mention mitigating impacts during the construction process.</p>	
<p>Individual NSPPSV148.16</p> <p>NSP P66 AIR QUALITY Poor air quality is causing thousands of extra deaths per year in London, with Southwark having one of the worst levels of air pollution,. This policy is unsound because no evidence is provided of the relative contribution of existing buildings and new developments, no discussion of measures to protect locations used by vulnerable groups (e.g. care homes, schools) or other significant measures.</p>	<p>Air quality is addressed in detail in the Air Quality Strategy and Action Plan (2017).</p>
<p>Organisation: Team London Bridge NSPPSV179.8</p> <p>23. We welcome the growing attention being given to air quality in planning policy. Policy P66 provides an important strengthening of the approach to avoid pollution. Nevertheless, evidence of the scale of the problem and the need for swift and effective action grows rapidly. Team London Bridge is currently working with Better Bankside to help deliver a Low Emission Neighbourhood for Borough High Street where annual mean NO2 concentrations are over 97 µg/m3, more than twice the legal limit. Concentrations can reach 132 µg/m3. Pedestrians, cyclists and motorists are being exposed to dangerous levels of air pollution on a daily basis. This is a world-class business area and transport interchange as well as a visitor destination and a health hub.</p> <p>24. The level of pollution is in direct conflict with the needs and values of the adjacent health and medical quarter centred on King’s College London and Guy’s Hospital Campus. Moreover, a Healthy Streets Assessment carried out by Transport for London (TfL) in June 2017 scored Borough High Street,</p>	<p>Our Air Quality Strategy and Action Plan (2017) outline specific methodologies to tackle air qualities issues beyond those mentioned in P66. It will be added to the amended document that Air quality improvement is not limited to the methodologies currently outlined in P66. Under “Reasons” P66 does identify a number of off-setting measures such as green planting/walls, upgrading to combustion plant, retrofitting abatement technology for vehicles and flues, as well as exposure reduction. Furthermore, reasons for other SP6 policies identify their importance in contributing to improved air quality, as seen in for instance P60: Trees which identifies the importance of tree planting in improving air quality measures. The Air Quality Strategy and Action Plan (2017) outline the importance of both behavioural change and physical infrastructure improvement. Construction impacts are also addressed in our amended document.</p> <p>SP6 identifies the role the council will take to “lead the way... in improving</p>

<p>Tooley Street and St Thomas Street West as ‘zero’ for clean air. This underpins the priorities identified in the TfL London Bridge Outcome Plan of:</p> <ul style="list-style-type: none"> • Improving walking and cycling conditions • Enhancing air quality and greening • Reducing levels of general motor traffic <p>25. We believe the new Plan can do more to support delivery of better air quality for the area.</p> <p>Recommendations</p> <ul style="list-style-type: none"> • Strengthen Policy P66 to go beyond design solutions for individual buildings to support urban design solutions to reduce air quality, including public realm improvements to provide urban greening and a network of pedestrian and cycling routes free of motorised vehicles • Amend Policy P66 to address the air quality implications of construction impacts, including those associated with large development sites that can operate over several years • Require significant development to be Air Quality Positive in the Ultra Low Emission Zone 	<p>our natural environment” which includes improvements to air quality. The strategy the council will take for council-owned properties is included in the Air Quality Strategy and Action Plan (2017).</p> <p>Vehicle use and air quality are addressed in SP5: healthy active lives and encourages a reduction in the number of motor vehicle journeys (point 4 P47: Highways Impacts).</p>
<p>Individual NSPPSV238.6</p> <p>The New Southwark Plan is not legally sound as:</p> <ul style="list-style-type: none"> – It fails to comply with the 2014 national planning practice guidance on transport or policy in the 2018 New London Plan – It is not justified by evidence: it relies on a totally out-of-date 2009 transport strategy and while it refers to the 2015 Southwark Cycling Strategy, it has cut out most of the routes in it without giving any reasons – It is not positively prepared to tackle air pollution, lack of opportunities for daily physical activity, road safety or congestion in Southwark 	<p>The New Southwark Plan complies with all national legislation. An update to the 2009 Transport Strategy will be made in 2019 with the publication of the Movement Plan. P66 refers to Air Quality, which is positively prepared in line with our Air Quality Evidence-Base Report. Reducing congestion is identified in the reasons of SP6 and further supported in SP5 policies to reduce motor vehicles (P47: Highways impacts).</p> <p>A green grid is included in our Southwark Open Spaces Strategy 2013. This is relevant to P58, P59 and P60 of the New Southwark Plan.</p> <p>Cycle and Walking routes are designated in updated movement plan which is to be published in 2019, which provides an updated plan for Cycle and</p>

And:

1. Southwark makes no provision for a linked up dense mature tree green grid, improving connectivity for wildlife and clean air for physical activity by greening corridors between our parks and green spaces with trees and other planting.
2. A high quality, high density network of cycling & walking routes, that meet if not exceed the London Cycling Design Standards and provide for significant growth
3. Reduce motor traffic, with clear targets and measures to tackle Satnav fuelled rat-running through our residential streets
4. No new private car parking in new developments other than disabled and car club bays
5. Tough policies on developers to ensure construction does not endanger people cycling and walking, such as by requiring the use of the highest safety rated lorries.”

walking Routes P48, P49 and P50.

Reduction of motor traffic is also addressed in our 2019 Movement Plan, along with strategies for parking in new developments (P52).

Individual
NSPPSV324.8

The Camberwell Area Vision and P66 are not consistent. Camberwell Green Road junction is already extremely busy and has recorded some of the highest levels of air pollution in London. Despite this the Camberwell section of NSP suggests that more large shops would benefit the area (page 163). We believe that the increase in traffic (already at unsustainable levels) coming into the area that this would cause has not been properly taken into account and is unjustifiable: Camberwell is not a suitable location for large shops.

AV.04 of the Camberwell Area Vision sets out to improve the local streetscape, particularly at the Camberwell Green Junction, further prioritising walking and cycling, improving public transport and the road network. While an increase in demand of this space may arise from the designated site allocation, the priority is that future development ensures that all carbon neutrality aims are met. By ensuring that this area is prioritised for new development, will increase the chance that the council is

Similarly, the only mention of the Camberwell Green Road junction is a desultory reference to “improve safety and reduce congestion” (page 163). It is particularly disappointing that Southwark Council and TfL have so far failed to come up with a revised plan for the Camberwell Green Road junction, following their last consultation in 2015. New proposals are needed urgently, and we believe lack of a proper plan puts into question whether the Camberwell Area Vision has been objectively assessed and whether it could be effectively put into practice.

New proposals are urgently needed on the Camberwell Green Road junction and should be included as part of the Camberwell Area Vision. The Camberwell Area Vision should also be revised to remove references to 'large shops', or at least a caveat that the development of large shops would not be undertaken without the proper infrastructure and air quality improvement measurements in place.

able to reduce traffic, improve congestion levels and thereby improving air quality levels. The recognition that no large shops will be taken place without infrastructure and air quality improvement measurements is underpinned by the expectations of policies in the plan.

Representation	Officer Response
<p data-bbox="188 504 891 536">P67: Reducing noise pollution and enhancing soundscapes</p> <p data-bbox="188 544 678 612">Organisation: Bankside Residents Forum NSPPSV19.29</p> <p data-bbox="188 655 1099 826">This policy is unsound because it as it makes no mention of noise pollution from unwanted street noise such as taxi ranks, late-night venues and routes home, or out of hour deliveries. P67 also does not highlight that often noise pollution can be attributed to a buildings ancillary equipment such as air conditioning units.</p>	<p data-bbox="1137 655 2067 1114">The noise pollution of unwanted street noise is taken into consideration in P67, and is further managed by Highways Department who are responsible for the effects of public highways on surrounding amenity space. P67 ensures the mitigation of noise in areas of high risk P13 Residential design, also provides assurance that high quality design will mitigate noise through built environment factors and strategic facades, windows and insulation. This means that all new development will be subject to meeting certain internal noise requirements that are seen as optimal within the built environment. While existing use of late-night venues, taxi ranks are difficult to change as they set an existing precedent to new development being introduced, there are alternative ways to P67 to ensure that noise levels provide comfortable amenity levels. For instance, P54 protection of amenity addresses the concerns mentioned in this comment.</p>

Representation	Officer Response
<p>P68: Reducing water use</p>	
<p>Organisation: Barkwest and Regent Group NSPPSV20.8</p> <p>We support the allocation of Devon Street and Sylvan Grove for redevelopment, and its removal from a Preferred Industrial Location.</p> <p>The site allocation states that “development in the opportunity area will need to demonstrate that the site responds positively to the objectives of the AAP and provides the appropriate facilities for health care, education and leisure facilities as well as community, energy and transport infrastructure”.</p> <p>The AAP will plan for appropriate supporting social infrastructure, including health care, education and leisure facilities as well as community, energy and transport infrastructure. The site allocation should clarify that individual developments may not each be able nor need to provide all of these supporting social infrastructure uses, but rather demonstrate that there is sufficient existing or planned social infrastructure to support the development.</p>	<p>Support noted.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.2</p>	

<p>Thames Water support the proposed policy on reducing water use. Ensuring that new development is as water efficient as possible will help to reduce the impacts on water resources and infrastructure associated with climate change and population growth.</p>	<p>Support noted.</p>
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.92</p> <p>Thames Water support the proposed policy on reducing water use. Ensuring that new development is as water efficient as possible will help to reduce the impacts on water resources and infrastructure associated with climate change and population growth.</p>	<p>Support noted.</p>

Representation	Officer Response
<p data-bbox="188 507 483 536">P69: Reducing flood risk</p> <p data-bbox="188 547 674 612">Organisation: Bankside Residents Forum NSPPSV19.30</p> <p data-bbox="188 655 954 684">Policy 69 is not consistent with Policy 58 on Reducing flood risk.</p> <p data-bbox="188 727 1088 863">SP6 stated objective is to use urban greening to reduce flood risk. This strategic goal should be applied more strongly to ensure that Policy 58 on major developments provides for green space which is used strategically to tackle flood risk as well as green infrastructure.</p>	<p data-bbox="1140 655 2063 900">One way to ensure mitigation of flood risk is through Sustainable Urban Drainage Systems, or provision of Green Infrastructure. This is clearly outlined in our Flood Risk Technical Paper (2017), where a preferred method of reducing flood risk and absorbing surface water runoff rates is through the provision of blue and green roofs. The link between Green infrastructures and Reducing flood risk is already clearly annotated under Point 1.2 (i), which suggests to "store rainwater for later use"</p>
<p data-bbox="188 948 353 1013">Individual NSPPSV176.2</p> <p data-bbox="188 1056 495 1085">Neighbouring authorities</p> <p data-bbox="188 1091 1039 1193">Policy 69 does not explicitly state that the borough will work with neighbouring boroughs. To tackle flood risk boroughs must collaborate across the sub-region. London Plan</p> <p data-bbox="188 1200 1093 1265">The new London Plan says: Boroughs should co-operate and jointly address cross-boundary flood risk issues including with authorities outside London.</p> <p data-bbox="188 1272 405 1300">Proposed Change</p> <p data-bbox="188 1307 1079 1372">To tackle flood risk Southwark must should co-operate and jointly address cross-boundary flood risk issues</p>	<p data-bbox="1140 1056 2024 1192">The Joint Waste Technical Paper has been published based on a newly formed South-East London Waste Management Partnership. This shows collaboration across the sub-region. This will be more clearly stated in the New Southwark Plan.</p>

The NSP policy P69 is not sound as it does not address the risk from ground water flooding.

Proposed change

Include a section stating how ground water flooding can be mitigated.

NSP16.1 It is unclear how a proliferation or an accumulation of basement developments in residential streets will be assessed in terms of total flood risk in that area. At present flood risk is assessed on a case-by-case basis and the cumulative risk of a number of basement developments in a small area is not assessed as a cumulative whole.

Proposed change

Clarify how the risk from an accumulation of basement developments should be assessed in terms of the cumulative flood risk in a specific street or area.

P69 1.3 and 1.4 It is unclear how the installation of permeable surfaces where planning permission is not currently required is being enforced.

Proposed Change

Clarify how permeable surfaces in front gardens will be enforced to ensure that a contribution is being made to reducing flood risk

Organisation: Thames Water Utilities Ltd
NSPPSV184.3

Thames Water support the proposed policy on reducing flood risk. The use of SuDS to reduce surface water run-off can assist with providing capacity within the existing sewerage network to meet the needs of growth. However, increases in foul flows to the existing sewerage network can result in adverse impacts, such as sewer flooding, on and off-site. Consequently, it is critical

Support noted.

<p>that any necessary sewerage network upgrades are delivered ahead of the occupation of development. In this respect the policy may benefit from reference to the need to ensure alignment with any necessary wastewater infrastructure and compliance with Policy IP1 to ensure that development does not result in any increased risk of sewer flooding.</p>	
<p>Organisation: Thames Water Utilities Ltd NSPPSV184.93</p> <p>Thames Water support the proposed policy on reducing flood risk. The use of SuDS to reduce surface water run-off can assist with providing capacity within the existing sewerage network to meet the needs of growth. However, increases in foul flows to the existing sewerage network can result in adverse impacts, such as sewer flooding, on and off-site. Consequently, it is critical that any necessary sewerage network upgrades are delivered ahead of the occupation of development. In this respect the policy may benefit from reference to the need to ensure alignment with any necessary wastewater infrastructure and compliance with Policy IP1 to ensure that development does not result in any increased risk of sewer flooding.</p>	<p>Support noted.</p>
<p>Individual NSPPSV324.4</p> <p>The Camberwell Area Vision has not been positively prepared in respect to flooding and is not consistent with Policy 69. Given the density of development proposed in the Camberwell Area Vision, there is not evidence that adequate consideration has been given to appropriate strategies to reduce the risk of surface water flooding. This level of development is also not justifiable without proper evidence of thorough consideration of issues such as increased flood risk. Though the NSP mentions 'urban greening' to reduce flood risk this does not seem to have been translated into the Area Vision.</p>	<p>All development to be undertaken in the Camberwell Area Vision will be subject to all policy in the new Southwark Plan, which includes P69 reducing Flood Risk. Further flood risk management strategies are outlined in Strategic Flood Risk Assessment Level II (2017). All factors, including consultation with Flood and Drainage will be undertaken upon development of Camberwell that will ensure that Flood Risk is thoroughly mitigated and maintained. Urban greening is one of the offsetting factors to reaching sustainable urban drainage and is included in the policy.</p>

There should be evidence of the strategic goal of 'urban greening' to tackle flood risk throughout the NSP area visions to ensure the Strategy has been positively prepared and effectively tackles flood risk.