

Name	Paula Orr
EiP Hearing Matter no	Matter 7
Section	(none)
Specific Strategy, Policy or Question	Questions 7.5, 7.6
Test of soundness failed	Not justified; not positively prepared; not effective; not consistent with national policies

## Matter 7 – Policies on Health and the Environment

### Issue

Whether the Plan is justified, effective, consistent with national policy and in general conformity with the London Plan in relation to health, the environment, heritage and tall buildings.

### Questions

#### *Open Space – General*

7.1 What requirements are there for new or improved open space and indoor sports facilities? Does the plan adequately identify the types of open space that are designated in the Borough? Are any new areas of open space proposed to be allocated?

The NSP has very limited ambitions as regards the provision of new open space. There is no policy for extending open space, in contrast with the London Plan, where Policy G4 on Open Spaces includes a provision to: “promote the creation of new areas of publicly-accessible open space particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change.”

The 2020 addition to the NSP of a Strategic Target relating to open space should have provided a future goal to work towards. The target however refers only to existing provision (‘Retain all Metropolitan Open Land, Borough Open Land and Other Open Space’). It represents a missed opportunity.

The borough’s Open Space Strategy (2013) recognised that the expected increase in population would increase demand for open space. Based on an assessment of population density and deprivation reveals, the Strategy identified that central and northern parts of the borough, including Peckham, Elephant and Castle, Borough and Bankside, parts of Bermondsey and the Aylesbury Estate as in greatest need for good quality open space to help address socio-economic issues.

Many parts of the borough are experiencing substantial change. In Peckham, my nearest town centre, there has been substantial change over the past two decades, with significant new housing and greater use of the town centre. This has not been accompanied by any provision of new open space. I am disappointed to see that the two site allocations in Peckham that have potential for including open space (NSP71 and NSP72) no longer mention provision of open space, but only refer to much less tangible ‘enhanced public realm and civic space’ (NSP71).

This limited understanding of the importance of open and green space is reflected in P56 Open Space. The Policy starts with the promising statement, “Development will not be permitted on Metropolitan Open Land (MOL) or Borough Open Land (BOL).” Unfortunately, the policy goes on to explore the reasons why development might be permitted. The same treatment is given to Other Open Space (OOS).

The London Plan has a positive approach to extending open space, which should be followed in the NSP. The London Plan states that: “*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*”. Southwark’s Open Space Strategy (2013) gathered evidence about areas of deficiency in green space across the borough and links with other types of deprivation. This evidence should be updated and used as the basis of a positive approach to identifying potential areas of green space expansion.

It is disturbing that the NSP considers a 0.8ha green space in one of the most densely populated parts of the borough (Elephant and Castle) park as “a major new park” (P56 Open space). The Covid-19 pandemic has demonstrated the vital importance of sufficient green and open space for health and wellbeing. Future-proofing the NSP would require the provision of additional green and open space for existing communities and its further extension where new residential developments are planned.

Improving the quality of existing open space can allow for the same space to provide for a range of different activities, meeting the different needs within communities. The quality of open space in the borough has been improved in recent years, with a greater offer of facilities such as green gyms, children’s playgrounds and outdoor education areas. However, there is a limit to what range of activities individual sites can support and there can be conflicts between the needs of different users. Improvement of quality alone will be insufficient to meet the needs of greatly increased local populations.

Southwark has a young population with specific exercise and recreation needs. Indoor sports facilities can meet some of these needs. There is a need for the NSP to detail and map these needs and indicate how these should be addressed in new developments.

### **Proposed changes**

The NSP should be aligned more closely with the London Plan, for example by including a clause that expressly recognises the need to increase greenspace, whether in the Strategic Policy or in P56 Open space.

P56 should identify areas of the borough where new open space should be provided and the mechanisms the Council will use (e.g. designations, planning conditions, etc) to ensure this provision.

### *SP6 - Cleaner, greener, safer*

#### **7.5 Is the overall approach in Policy SP6 justified, effective and consistent with national policy?**

I do not consider SP6 to be justified or effective. It seeks to cover all the environmental issues that planning policy should be addressing but fails to provide a coherent understanding of the local context and priorities or to show what action will be taken and how the NSP will coordinate and monitor this action. SP6 is generally evidence-light. Where new evidence has been added (e.g. points 3 and 4 under Reasons), it is disappointing that there is no follow-through from the evidence

presented (e.g. on Living Environment Deprivation) to priority actions to be taken to reduce deprivation in relation to issues such as air quality and road traffic accidents.

SP6 provides no steer on addressing the climate emergency. The climate emergency is mentioned in two places in SP6: one in the main policy statement and one under 'Reasons'. Both feel like add-ons which don't read through to other parts of SP6. The sentence referring to the climate emergency under 'Reasons' ('The council has declared a Climate Emergency with the ambition to reach carbon neutrality by 2030') is not connected to any other part of this section (the following sentence says, 'We will play a leading role in making Southwark a place where people enjoy spending time and can thrive by ensuring the borough is clean, green and safe') and is therefore an irrelevance.

### **Suggested changes**

I believe that NSP is unsound because it fails to meet the requirements of the Planning and Compulsory Purchase Act (2004)

- I suggest inserting a new box in SP6 to set out measures and targets for addressing the climate emergency policies that sit beneath SP6 (e.g. P61 Reducing waste reduction, P66 Reducing water use) and how action and their effectiveness will be monitored.

## **7.6 Does the policy provide sufficient strategic guidance for other policies such as those which seek to providing new open space?**

I want to comment specifically on the steer that the Strategic Policy should provide on addressing the climate emergency. The Planning and Compulsory Purchase Act (2004) requires that development plans include policies designed to contribute to the mitigation of, and adaptation to, climate change. It should also ensure the integration of these policies. Almost all the SP6 policies are directly relevant to climate change mitigation and adaptation: green infrastructure, trees, reducing waste, improving air quality, reducing water use and reducing flood risk, to name a few.

### **Suggested changes**

SP6 should make a clear commitment to establish targets for reducing carbon emissions and increasing local adaptation and resilience to a changing climate and to monitor how these targets are being met. This will provide evidence of the actions being taken and progress made, offering:

- Accountability to local people about how their concerns are being addressed;
- Information and evidence on the importance of the climate crisis, to residents, businesses and people who visit Southwark;
- Inspiration to encourage local organisations and individuals to take action themselves.

SP6 should also make an explicit link to other strategic policy areas, indicating where emissions reductions and/or adaptation measures will be required.