

Your name	Susan Crisp Catriona Sinclair
Organisation Name	Friends of Burgess Park
EiP Hearing Matter No.	Matter No 7
Specific Strategy, Policy or Question	SP6 P55 Amenity space P56 Open space P59 Biodiversity
The test of soundness the plan fails	The policy is not effective

Why does the policy fail? What is the problem?

Matter 7

*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**.*

Q 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?

Requirements for new open space and sports facilities

Recent council policy has focused on improvement of parks and this has been successfully delivered, although always more to do. More attention is now needed for new open space and outdoor and indoor sports provision.

Children need spaces to run and play games, young people need spaces for informal football/rounders, riding bikes. Tightly over-designed public space, typically seen in Developers proposals leaves no space for these things to happen. “No ball games signs” and “young people are a problem” are the consequence.

Need and demand for open spaces (including green space and other community space such as public squares and play space) and sports facilities (indoor and out) is vital for quality of life for residents (supporting SP2 and SP5).

Example 1: Outsourcing of open space to Developers and private ownership various examples in Southwark include: More London Queen's Walk SE1, Elephant Park at Elephant and Castle, and the proposed Old Kent Road, new linear park and green space designated on Mandela Way. Management and maintenance and long term, permanent rights of way and public access need to be secured. This should be secured through legally enforceable means, and the land appropriately designated on the NSP.

Example 2: Multi Games pitches and ball courts (at least 3) were provided on the Aylesbury Estate, they will not be replaced and are not mentioned in the Aylesbury AAP or plans, relying on Burgess Park for sports.

Example 3: The new draft OKR AAP does not make sufficient provision for sports facilities indoor/outdoors, sports is barely mentioned. The current planned increase in sports facilities provision in Burgess Park is for the current population and will not meet the needs of OKR proposed expansion of population. Additional park provision is planned into the AAP.

Example 4: The pressure for sports facilities in parks and green spaces, overdevelopment of Burgess Park with additional sports provision proposals for a skate park, and extension of astro-turf. Brimington Park, Old Kent Road, expansion of hard surface sports provision. Parks are free provision for the public whereas often sports provision is paid for. In Burgess Park the sports, tennis and BMX is all paid for provision. This is a huge chunk of what is MOL. Additional provision of space for sports (in and outdoors) is required outside of parks provision.

We support additional identification of open space in areas of deficiency to meet the needs of current and planned increase in population.

The assessments of need

Friends of the Earth Green Space Gap report 2020 identifies that areas of deficiency of green space map to areas of deprivation, areas of social housing and lack of other amenities. Areas deficient in green space should be identified (the new London Plan references GiGL as a source).

As public policy develops more holistic approaches to improving physical activity and healthy weight (SP5) the demand for open space, informal physical activity will rise; examples space for rollerskating in parks/public realm, dance groups, outdoor exercise classes, space for informal multi-sport activity e.g. basketball with MUGAS, skateboarding and parkour, informal football. All of these activities can take place in a variety of open spaces, we support more open space both in and outside the parks for these types of activities.

“Active Southwark”, Sport and Physical Activity Strategy 2019-2023, Southwark Council, does not set out or reference an evidence base. SP603A - Southwark Playing Pitch Strategy: sets out higher levels and demand for sport and physical activity in Southwark than other London boroughs and an overall shortage of pitches. This also does not take into account informal football in parks on the grass (including regular sessions with children and adults games) which creates additional park usage alongside other park users. SP602 - Southwark Open Space Strategy (2013) main focus is improvement of existing open spaces.

Southwark has one of the highest rates of obesity in the country (Everybody’s Business Southwark Healthy Weight Strategy 2016-2021 Southwark Health and Wellbeing Board) combined with high levels of density and homes in flats. The need for more outdoor space in north and central Southwark is essential.

New open space

For the OKR Opportunity Area Southwark Council has adopted a strong Place Shaping role and identified the green route and additional new park space which is supported. Delivering new open space in a consolidated manner across schemes will provide in many cases, better play spaces, meeting spaces and larger green spaces than the smaller required play and amenity space on individual sites.

Proposed text amendments on NSP EiP27A submitted 2020 version

SP1A development targets should include quantified aspiration on open space.

SP6 - Cleaner, greener, safer

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

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

SP6 does not provide sufficient clarity in strategic guidance.

Beginning with the strategic targets (page 15) the importance of the environment and by implication Climate Change is absent. The NSP says:

“Working towards cleaner energy and protecting the environment

- All developments must reduce their carbon emissions.
- Retain all Metropolitan Open Land, Borough Open Land and Other Open Space.”

The strategic message from these “targets” is maintaining the status quo. There is no strong message conveyed about what would be wanted to provide a strong enough signal to Developers or Planning officers as to the priorities for the borough.

The reasons section repeats content from SP5. It has not kept pace with the London Plan policies on trees, environment and biodiversity. The reference to crime and safety in public space is relevant but cross referencing to the relevant policy, now moved to another section.

The new London Plan ambition for London to model a national park city and Good Growth means that to be in conformity Southwark should state a more ambitious plan tackling the Climate Emergency change as a strategic objective.

The policies need to be considered in terms of the cumulative impact across the urban landscape.

Strategic priority 6 could state ambitions such as;

- We wish to increase open space especially in areas of deficiency
- We wish to increase tree and canopy cover across the borough especially in areas of deficiency
- We wish to increase green infrastructure to deliver against a green infrastructure strategy (London Plan)

P55 - Protection of Amenity

7.16 What does the policy consider to be amenity? Is the policy sufficiently clear as to the circumstances where development may be acceptable? Will it be effective?

7.17 Are any main modifications to Policy P55 necessary for soundness?

There is no legal definition of amenity should encompass: character and townscape, trees and planting, access to sunlight, use of the space for community and social activity, including meanwhile use, and benefit existing residents as well as future residents. Amenity space is vital for SP5 and SP2.

The NSP does include a definition of amenity in the Glossary and it would be beneficial to bring this forward to the policy. The definition endorses the importance of character and townscape and appears to be a broader definition than in the new London Plan.

Development around MOL and other types of open space can be detrimental to the amenity value, encroaching onto the openness and impacting on the amenity value. The impacts of development (eg noise, shading, lighting etc) will also have an impact on the openness of the amenity as well as impacts on plants and habitats, biodiversity. All trees are valuable and have amenity value and contribute to green streets and spaces in many valuable ways.

The impact of tall buildings beside amenity space can cause substantial problems with shade, wind, impact on wildlife all of which have a cumulative impact and lead to loss of amenity value.

P56 - Open Space

7.22 Are any main modifications to Policy P56 necessary for soundness?

P56 Open Space does not go far enough in protecting MOL and BOS. The policy only protects MOL from being built on and has no consideration of the impact of development beside open space. Far greater protection is needed for existing open space with sites being identified as not suitable for tall buildings and or appropriate heights and set-backs. Impacts include:

- The need for a sensitive park edge and adequate set-back
- Building lines and frontages
- Height and massing
- Buildings stepping up in height away from the park.
- Character area - Park edge (B) - developing a cohesive design approach, utilising the existing brick walls which reflect the past
- Noise and lighting from new developments

Example 1 Burgess Business Park appeal decision - The appeal decision identified the importance of the park edge and adequate setback for new developments.

Example 2 Tanner Street Park - local campaigns against developments around the park which will cause shade and loss of sunlight. The planning committee have not resisted these developments, despite significant objections and local campaigns.

These pressures will intensify with densification and pressures for taller buildings. The developers reports minimise the impact on loss of amenity and impact on open space sighting.

Kensington and Chelsea Borough Plan 2019 Policy CR5 Parks, Gardens, Open Spaces and Waterways takes a more proactive approach recognising that development beside or adjacent to green space will have a negative impact (as outline above on amenity). The policy explicitly states that the council will “resist development that has an adverse effect upon the environmental and open character, appearance and function of ... “(MOL, BOS, garden squares, communal gardens etc).

Proposed text amendments on NSP EIP27A submitted 2020 version

Add new text:

New No. 3. The council will resist development that has an adverse effect upon the environmental and open character, appearance and function of open space.

P59 – Biodiversity

7.27 Is the policy consistent with paragraph 174 of the Framework in respect of identifying ecological networks and the hierarchy of international, national and locally designated sites of importance for biodiversity?

7.28 Is the requirement in P59(2) that any shortfall in biodiversity net gains must be secured through planning obligations or contributions justified? How will the amount be calculated? Would it be viable?

We support any shortfall in biodiversity net gains to be secured through planning obligations or contributions. We would also encourage that biodiversity net gains can make valuable contributions offsite as well as onsite when there is a clear plan for increasing local open space and an approach that supports plantability; meaning sites of adequate size to support a tree and surrounding planting or other amenity space. This approach can be facilitated by identification of site opportunities especially across areas of the borough deficient in open space.

London Plan Section 7.19, clause 7.61, which states: ‘Most wildlife habitats are difficult to recreate, accordingly the replacement or relocation of species and habitats should only be a last resort.’ The wording in the NSP, by contrast, implies that falling short of the required standard will be the norm and that making ‘a financial contribution’ to avoid the need to comply with the regulations will be a routine option.

There are far too many examples of play and amenity space with small planters set amongst hard landscaping. This does not provide adequate habitat for species, the small planted areas do not form meaningful stepping stones or corridors. They do not contribute to a borough wide approach as set out in the new London Plan Policy 1 Green Infrastructure.

London Plan Policy G5 Urban Greening “Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments...Existing green cover retained on site should count towards developments meeting the interim target scores” In new developments, more incentive is needed to retain mature hedges, shrubs and areas of scrub which not only have value as habitat for wildlife and contribute to green corridors but are also effective shields from noise and pollution. In Canada Water extensive hedges and shrubs were removed as well as the trees. An Urban Greening Factor policy (UGF) for all development, favouring retention of trees and other green cover would balance the benefits of existing and new planting.