

# Matter 7 – Health & The Environment

From: Ralph Smyth

On behalf of: Southwark Cyclists

## 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.**

### *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 fails to plan positively for new open space. It should consider opportunities to change streets into sections of linear parks that can be cycled through, whether in areas of greenspace deficit or where there is a need for ecological connectivity for biodiversity or to make routes attractive. Paris is greening the Champs Elysee, while Hackney's 21st century streets programme is doing this at a smaller scale.

*7.2 How does the plan respond to any parts of the Borough that do not meet the open space standards? Are the provisions for new allocations/ designations in Area Visions translated into policy?*

Quite simply, it fails to do this, despite “developing a green walking network” for the borough being a manifesto promise of the winning party in the 2018 council elections.

### **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?*

No it is still too vague for the same reasons as set out in 2018 but even more so in light of subsequent changes to national and London wide policy. More details are set out in individual policies below.

### **Policy P44 – Healthy Developments**

*7.7 What are the health issues in Southwark that part 1(1) of the Policy is seeking to address? What will be measure of ‘easily accessible’? What are ‘healthy activities’ for*

*the purposes of part 1(2) of the policy?*

Southwark has some of the greatest healthy equalities in the UK, for instance child health outcomes between Dulwich and Camberwell. Health inequalities from lack of opportunities to integrate exercise into daily life, in particular walking and cycling. As local author Peter Walker points out in his new book, [The Miracle Pill](#) (2021): “Four in ten British adults, and 80% of children, are so sedentary they don’t meet even the minimum recommended levels for movement”.

While sports may appeal to some, active travel offers the best way to maximise the uptake of the recommended amount of weekly activity for the most people. Though the NSP appears to acknowledge this, it fails to include effective policies to deliver it. This is not just about designing in a good quality public realm but actively designing out driving, especially for short trips, as the Mayor’s Healthy Streets Approach requires.

### **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?*

No, in relation to enhancing networks by providing new sites and connections this simply has not been done. There are important synergies with planning positively for nature recovery and for active travel networks that are attractive by reason of Green Infrastructure.

### **P64 - Improving Air Quality (P66)**

*7.34 Is the policy justified, effective and consistent with national policy?*

*7.35 Are the requirements justified and in accordance with Regulation 122 of the CIL Regulations (as amended)?*

*7.36 Is the requirement for developer contributions in P64(2) justified and how will it be calculated? Would it be viable?*

No the policy is not sound and yes requirements are justified but need to be strengthened.

On 22 May 2018, Public Health England (“PHE”) published a [study](#) on the health costs associated with particulate air pollution, and estimated that, between 2017 and 2025, the total cost to the NHS and social care of air pollution in England will be larger from PM2.5 than for NO2 pollution. Roadside particulate levels have not declined since 2015 and as a result PHE has recommended adopting in national policy a “net health gain” test to ensure developments are “clean by design”, and a “hierarchy of interventions” ([Review of Interventions to Improve Air Quality](#), 2019). It found that “[d]riving restrictions produced the largest and most consistent reductions in air pollution levels”. While the ULEZ has been effective to cut NO2 through changing engines and exhaust control systems, it has been far less effective in cutting particulates that increasingly come from tyre and brake wear.

The Government has indicated it will include legally binding limits on particulate air pollution in the Environment Bill by October 2022. Emerging concerns that coronavirus may continue

to mutate and be a long standing respiratory disease make tackling air pollution even more important.

P64 should be strengthened to seek net health gain from developments and to seek opportunities for consolidation of deliveries (whether for construction or during a development's occupation).

**P65 - Reducing noise pollution and enhancing soundscapes (P67)**

*7.38 Are the requirements of the policy justified, effective and consistent with national policy? Is the policy sufficiently clear about the mechanisms that may be used to control noise pollution?*

No. It fails to plan positively to reduce noise pollution, such as from traffic, instead simply seeking to mitigate noise increases. Defra in 2010 estimated the public health cost of noise pollution in urban areas to be £10 billion.

The 2019 Movement Plan is flawed in that under its goal of reducing noise, it simply set out measures to reduce exposure to noise pollution from transport, rather than reduce noise itself. Nonetheless its proposal for more quiet routes, to allow people to walk and cycle away from bustle, is welcome, so long as it goes hand in hand with improving conditions on main roads too. There is no connection made between the NSP and Movement Plan in this regard, however. Although electrification will over time reduce noise impact from traffic, there will still be considerable ICE vehicles operating during the currency of this plan.

Policy P65 should be modified to seek an improvement in the noise environment and any development close to active travel routes off major roads should be designed *and* managed during occupation to improve the soundscape, such as through Delivery and Servicing Plans.