

TEMPLATE FOR POSSIBLE OBJECTIONS TO NEW SOUTHWARK PLAN (NSP) SUBMISSION VERSION SP6, P56, P58

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I wish to take part at the oral examination/public hearings.

TOPIC Policy Number +Name Page number	Soundness test to which objection relates	OBJECTION / TEST OF SOUNDNESS Give details of why you consider this part of the NSP to be unsound or not legally compliant.
SP6 Cleaner, greener, safer	Not positively prepared	<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 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>
Policy 56 Open Space	Inconsistent with Mayor of London’s London Plan	<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: <i>The extension of MOL [Metropolitan Open Land] designations should be supported where appropriate.</i> • Policy G4 Local green and open space states: <i>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.</i> <p><i>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.</i></p>

	<p>Draft Southwark Plan Internally inconsistent</p>	<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, <i>“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.”</i> However, few site allocations mention green and open space or set out the amount of space to be allocated for this use.</p>
	<p>Not positively prepared</p>	<p>Policy 56 is unsound because it has not been positively prepared, taking account of the greenspace needs of current and future residents.</p> <p>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, <i>“Increase or improve the number and quality of local open spaces, squares and public realm”</i>, only 5.2% of the total site allocations is destined for the provision of open or greenspace (3,151m²).</p> <p>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.</p> <p>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.</p>
	<p>Not effective</p>	<p>The NSP is unsound because it is ineffective in addressing health and wellbeing needs of its residents.</p> <p>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</p>

		<p>needs of existing residents in areas acknowledged to be in deficit.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Introduce a sentence to establish that greenspace will be improved and extended to meet the needs of Southwark’s growing population.</p> <p>* MOL = Metropolitan Open Land; BOL = Borough Open Land; OOL = Other Open Land</p>
<p>Policy 56 Open Space</p> <p>Point No. 1.1</p>	<p>Not Justified</p>	<p>The NSP is unsound because ancillary facilities should positively contribute to both openness and character of the open space.</p> <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>Policy 58 Green Infrastructure</p> <p>Policy 56 Open Space</p> <p>Point No. 2</p>	<p>Not effective</p>	<p>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: ... replacement OOS of equivalent or greater size AND substantially better quality can be secured etc.</p>
<p>Policy 58</p> <p>Major development</p> <p>Large scale major development</p>	<p>Not Effective</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>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</p> <p>Green infrastructure</p>	<p>Not positively prepared</p>	<p>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.</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>