



New Southwark Plan BACKGROUND PAPER

**Open spaces
December 2019**

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1 Executive summary

1. Open spaces in Southwark cover over 21% of its land area, including woodlands, parks, community farms, cemeteries, Thames-side paths and sports pitches. Open spaces are an essential resource for residents and visitors, used for sports and other exercise, relaxation, socialisation, nature conservation, food growing and cultural events. Policy in the New Southwark Plan ensures that existing open spaces are maintained and improved. Regeneration provides the opportunity to improve the quality and quantity of new open space introduced in an area. This background paper details the policy context for open spaces in Southwark, as well as outlining the delivery of open spaces against existing and new London Plan targets in the borough.

2. The methodology used in the final section of this report indicates Southwark's policy position, which is that the monitoring of open spaces in the borough should adhere to the following four qualitative criteria, guided by regional and national policy. This includes:

A: Open space should contribute to the physical structure of London by being clearly distinguishable from the built-up area.

B: Open space should provide open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London.

C: Open space should contain features of landscapes (historic, recreational biodiversity) of either national or metropolitan value'

D: Open space should form part of a green chain or link in the green infrastructure network.

3. Appraising against the above criteria provides an indicator for how well each of our opportunity areas are in their current provision of open space, which easily identifies opportunities for improvement. The main ambition of this methodology is to align the improved provision and maintenance of open spaces in the borough, with overarching ambitions for sustainable development set out in the draft Local Plan.

2. Policy Background Context

2.1 National

1. Metropolitan Open Land (MOL) is designated on the basis of the value provided to London as a whole, or its metropolitan-level of significance (MOL). This differs from Borough open land (BOL) which is assigned based on its contribution to the borough. Southwark has a third criterion for designating open space, recognised as Other Open Space (OOS) which considers protecting park spaces, community gardens and play areas in the borough. The London Plan states that MOL and Green Belt should be provided equal status and that the principles of national Green Belt policy should apply to MOL. For this reason the limitations of Green Belt policy is essential to understand MOL designation in London.
2. Green belt and MOL is primarily recognised for its importance on guiding surrounding development to require higher densities in non-designated land and reverting from the condition of urban sprawl. The London Plan sets out the targets of land-use efficiency as meeting both housing targets and fulfil London's desire to be over 50% MOL designated by 2050. It is therefore important that each borough recognises the land that has already been designated by MOL and ensures methods are in place to still meet overarching housing policies.
3. The justification for continued MOL policy includes creating sustainable communities, ensuring access to open space and recreation, conserving historic assets and preventing harmful development on or adjacent to open space.
4. The 2019 National Planning Policy Framework (NPPF) (and its predecessors) does not provide specific guidance available on conducting a MOL review. Therefore it is the responsibility for each borough to produce its own assessment criteria for designating MOL and fine-tuning MOL boundaries in future iterations of the plan, to ensure the most sustainable outcomes. Green Belt and Metropolitan Open Land are described in paragraph 96, 171 and the following chapter on Metropolitan Open Land, and Paragraphs 7-9 of the NPPF 2019, which will be described in further detail in the Open Spaces Policy Background Context section of this paper.

2.2 Regional

Adopted London Plan (2016)

5. Policy 7.17 of the London Plan (2016) establishes the policy context for MOL. At the strategic level, support is expressed for the current extent of MOL, its extension in appropriate circumstances, and protection against development that would have an adverse impact on its openness. The policy states that any alterations to MOL boundaries should be undertaken as part of the LDF process, and that to designate land as MOL it is necessary to demonstrate that the land meets at least one of the following criteria:
 - a) 'It contributes to the physical structure of London by being clearly distinguishable from the built-up area;
 - b) It includes open area facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve the whole or significant parts, of London;
 - c) It contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value; or
 - d) It forms part of a green chain, or a link in the network of green infrastructure and meets one of the above criteria.'
6. The supporting text to Policy 7.17 states that 'paragraphs 79-92 of the [2012] NPPF on Green Belts applies equally to Metropolitan Open Land (MOL)'.
7. The supporting text provides further detail on amendments to MOL boundaries, highlighting in particular that 'green chains' should be designated MOL due to their London-wide importance, and stating that the loss of MOL for the creation of new open space elsewhere will not be supported.

Draft London Plan (2019)

8. Although the 2016 London Plan remains adopted policy, the 2019 draft London Plan and Planning Inspector's report comments (2019) guides policy formation in Southwark. It should be noted that the draft London Plan has been examined against the 2012 NPPF and therefore does not take into account any changes made in the 2018/2019 versions

of the NPPF. The Secretary of State for Housing, Communities and Local Government has stated that a revised London Plan must be brought forward at the earliest opportunity, which has regard to the new national policy. Given that the NPPF is 'silent' on the issue of MOL, this direction is more significant in terms of any impact for Green Belt policy. However, it is important to consider given the close intertwining of these two policy strands in the London Plan.

9. The draft emerging London Plan includes Policy G3 on MOL. The requirements of this policy are similar to the adopted London Plan, i.e. the need to protect MOL from inappropriate development, including development which has the potential to harm MOL, and encouraging the enhancement of quality and range of uses for MOL. The policy now explicitly states that MOL is 'afforded the same status and level of protection as Green Belt.'
10. The criteria for designating MOL remain broadly unchanged. The policy continues to require that any alterations to the boundary of MOL be undertaken through the Local Plan process. However, the policy now explicitly states that boundary alterations should only take place in exceptional circumstances, which must be fully evidenced and justified.

2.3 Local

New Southwark Plan

11. Southwark's policy on MOL is set out in the Core Strategy (2011) where Core Strategy as part of Strategic Policy 11: Open Spaces and Wildlife which protects MOL on the basis of being important to all of London. Due to the importance of smaller spaces to the people of Southwark, Borough Open Land (BOL) was introduced, providing strong protection for smaller spaces. It is clear that the highest level of protection must be kept open in nature with development only in exceptional cases, including Burgess Park, Southwark Park, Dulwich Park and Peckham Rye Common and Park.
12. Southwark's (2010) Open Spaces Study and (2013) Open Space Strategy assesses the supply of open spaces in the borough. It sets out information on the quality and need for open spaces and identifies areas of deficiency using the London Plan Public Open Space hierarchy. The study has identified that there is not an even supply of open spaces across Southwark. Half of our open space is focussed in the south of the

borough in the Dulwich, Nunhead and Peckham Rye community council areas. While the north of the borough has access to major parks including Burgess Park and Southwark Park, smaller spaces are particularly important to local people. The areas in the north also have fewer trees and gardens. This will be further extrapolated in the appraisal methodology used as part of this background paper.

3. Analysis

3.1 Introduction

13. This background paper covers the research and evidence base on open spaces used to inform the approach taken in the New Southwark Plan. It summarises our evidence base, describes our strategy for open space and reasons for selecting the policy options set out in the New Southwark Plan (NSP).
14. The paper informs our policy position, including a review of national and regional policy to inform the selected approach to policy in the New Southwark Plan.
15. This paper considers the following policies:
1. SP6: Cleaner, Greener, Safer
 2. P24 River Thames / P57 Open water space
 3. P56 Open Space
 4. P58 Green Infrastructure
 5. P59 Biodiversity
16. This background paper comprises of five sections. The previous section set out the national, regional and local policies and strategies that have been informed the policy evaluation process. Section 3 provides the evidence and research into policies which inform open spaces, and indicates consideration of the options and how they have evolved during the consultation process and at different stages of iteration of the plan, landing on the preferred options version as implemented in the New Southwark Plan Submission Version. Section 4 provides a methodology for assessing the quality of designated Open Space in the borough, and Section 6 presents concluding remarks on how we see open spaces- related policies evolving in future iterations of the plan.

Table 1: adopted open space policies in Southwark.

| Policy | Southwark Plan Saved Policies (2008) | Core Strategy (2011) |
|-----------------------------|--------------------------------------|----------------------|
| SP6 Cleaner, Greener, Safer | SP15 Open Space and Biodiversity | SP1 Sustainable |

| | | |
|---|--|---|
| | SP11 Amenity and Environmental Quality SP12 Pollution SP14 Sustainable Buildings | development SP11 Open spaces and wildlife SP13 High environmental standards |
| P57 Open Water Space / P24 River Thames | P 3.29 Development within the Thames Policy Area P 3.30 Protection of Riverside Facilities SP 16 River Thames | SP11 Open spaces and wildlife |
| P56 Open Space | SP15 Open Space and Biodiversity P 3.25 Metropolitan Open Land P 3.26 Borough Open Land P 3.27 Other Open Space | SP11 Open spaces and wildlife |
| P58 Green Infrastructure | None | SP11 Open spaces and wildlife |
| P59 Biodiversity | Policy 3.28 Biodiversity | SP11 Open spaces and wildlife |

17. The appendices of the Southwark Plan Saved Policies (2008) that support each of SP58 Open Spaces Policy include:

- Appendix 9 MOL Schedule
- Appendix 10 BOL Schedule
- Appendix 11 (Figure 8) Local Park Deficiency
- Appendix 13 Other Open Space Schedule
- Appendix 14 SINC's

18. Subsequent sections look at the relevant national, regional and local policy where necessary to provide justification for the preferred option presented in the NSP. A full policy review of regional, national and local policy is also set out in the previous section.

3.2 Issues and Options

19. This section considers each of the policies determined by the legislative requirement to protect and enhance open spaces as set out in the background section of this document. This includes evaluations of Policy SP6, P24/P57, P56, P58 and P59 which are most relevant to open space designations and review. Each evaluation provides insight into the evolution of the policy through different stages of the Plan, how they were informed by consultation responses received, further evidence- base documents being prepared and justification for the policy option to be taken.

3.3 SP6: Cleaner, Greener, Safer

3.3.1 Background to Policy SP6

20. Policy SP6 sets out our strategic approach to achieving environmental sustainability in the borough.

21. Within the Core Strategy (2011) and adopted Southwark Plan (2007), health and wellbeing benefits are a key reason to protecting open spaces and green infrastructure. Recently, greater emphasis has been placed on the value of open space and green infrastructure on reducing carbon footprint, which will lead to reduced congestion and improved air quality amongst other beneficial outcomes.

22. The policy encourages buildings to be as energy efficient as possible, networks to support active travel, and the protection of open spaces and biodiverse habitats with its tangential benefits.

23. Table 2 sets details how the New Southwark Plan policies have evolved through the different stages of the Plan and highlights the key changes at each stage. These amendments have been informed by consultation responses received and further evidence base documents being prepared.

| Policy | NSP O (2014) | NSP PO (2015) | NSP PSV (2017) | NSP AP (2019) | NSP Submission (2019) |
|--------|--------------|---------------|----------------|---------------|---|
| SP6 | No | substantial | changes | through | <p>options</p> <p>Make new and existing buildings as energy efficient as possible</p> <p>Make Southwark a place where walking, cycling and public transport are the first choice way to travel</p> <p>Protect and improve network of open spaces, waterways, trees, biodiverse habitats</p> <p>Urban greening to reduce flood risk and improve air quality</p> <p>Work with local people to deliver a clean, green and safe borough</p> |

Table 2: evolution of the New Southwark Plan Policy SP6 – Cleaner, Greener, Safer.

3.3.2 Consultation responses summarised

24. The consultation responses received to the Proposed Submission version of Policy SP6 are summarised below:

- No strategic issues were brought up as part of the consultation responses, instead it was minor wording changes

3.3.3 Sustainable Development Targets

25. SP6 sets out the strategic sustainable development targets for the borough. It supports the development of planning policies that support the recent council commitment towards reaching carbon neutrality by 2030 through the “Declaration of Climate Emergency” in March 2019. This commitment towards 2030 carbon neutrality is considered more ambitious than the 2050 commitment declared in the emerging New London Plan GG6

which requires planning policy to contribute towards London becoming a zero carbon city by 2050.

26. The methods of monitoring for the Climate Emergency are currently under deliberation. On the 27th March 2019 Council assembly resolved to call on cabinet to develop a strategy, working with local stakeholders, to ensure that the council becomes carbon neutral at a much more rapid pace than currently envisaged.
27. Amendments to the 2011 Carbon Reduction Strategy are required, updating the initial plan for 80% reduction by 2050 to 100% reduction by 2030.
28. Targets laid out in this strategy will be flexible to make use of new carbon reduction technologies as they develop.
29. Data from the most recent 2011 Carbon Reduction Strategy show that around **86%** of the boroughs CO² emissions are not within direct council control and only **12%** of the borough emissions come from its own housing.
30. To achieve carbon reduction targets it is necessary for the council to support workplaces and homes that is not council-owned. These will be described and monitored in a separately produced Energy Evidence-based paper post the submission of the New Southwark Plan. Secondly, the monitoring of energy sustainability will be accessible in the Annual Monitoring Report.
31. **16%** of the boroughs carbon emissions come from transport, which is an issue tackled separately in the council's Movement Plan (2019). Addressing this source of emissions will require further coordination with development management policies and is not an issue addressed in SP6.
32. The Movement Plan (2019) does interrelate with the designation of open spaces, which is addressed in greater detail in later Section of this background paper. That is because they require active travel that depends on green, peaceful and calm places with green links and quiet routes away from traffic, an ideal characteristic of a high quality open space. The criterion developed from the movement plan supports Criteria B and Criteria D of the MOL Open Spaces Review provided at the final section of this report.

33. This is a necessary interrelationship with green infrastructure and open spaces that are able to support easy and safe walking and cycling. Consultation comments have shown that not in all cases is cycling and other activities in green, open spaces compatible. In creating clear and connected walking and cycling routes, they must be well-maintained and recognising the relationship between streets, parks, public places such as housing estates.

3.3.4 Strategic Sustainability (“Cleaner, Greener, Safer”) Targets

34. The reasons after the policy set out ways of meeting the Sustainable Development targets through this policy. They have been updated to include the most recent Draft London Plan target and NPPF 2019.

National Planning Policy Framework (NPPF) (February 2019)

35. Paragraph 8b suggest that health, social and cultural well-being are identified under the **social objective** of the NPPF 2019. Intentioned to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing;

36. Paragraph 8c identifies the **environmental objective** to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, mitigating and adapting to climate change, including moving to a low carbon economy.

37. Paragraph 10 indicates that sustainable development is pursued in a positive way; at the heart of the Framework is a presumption in favour of sustainable development.

38. SP6 works to combine the three principles of sustainable development (economic, social and environmental) that will ensure that development is sustainably achieved. Its greatest emphasis is on the value of environmental objectives in contributing to

meaningful social outcomes, which is detailed more specifically in the Council's evidence-base.

New London Plan (emerging 2019)

39. The overarching aim of the London Plan is to achieve “Good Growth”, referred to in the policies in NSP as growth that is socially and economically inclusive and environmentally sustainable. It is the way in which sustainable development in London is going to be achieved, supporting paragraph 11 of the NPPF 2019. The Six Good Growth policies overarching all of the policies in the Plan:

- Policy GG1 Building strong and inclusive communities
- Policy GG2 Making the best use of land
- Policy GG3 Creating a healthy city
- Policy GG4 Delivering the homes Londoners need
- Policy GG5 Growing a good economy
- Policy GG6 Increasing efficiency and resilience

40. SP6 works to achieve Good Growth as the strategic target of the London Plan, in particular support of GG6 which:

*“Seeks to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a **zero carbon city by 2050**; and*

- *Ensure buildings and infrastructure are designed to adapt to a changing climate, making **efficient use of water**, reducing impacts from natural hazards like **flooding** and heatwaves, while mitigating against and avoiding contributing to the urban heat island effect; and*
- *Create a **safe and secure** environment which is resilient against the impact of emergencies including fire and terrorism; and*
- *Take an integrated and smart approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.” (emphasis added subsequently)*

41. Chapter 8: Green Infrastructure and the Natural Environment of the New London Plan focus on the holistic nature of green and open spaces in contributing to the built environment.

42. Southwark's Energy and Carbon Reduction Strategy (2011) provides monitoring strategy as to how the objectives of SP6 will be met. It is in the process of being revised. The previous target for CO₂ emissions was 80% reduction in carbon emissions by 2050 set in 2006. This has been increased to 100% reduction in carbon emissions by 2030 set in 2019. As not enough time has elapsed to indicate the likelihood of reaching the new emissions target, the research published in 2011 follows the previously set 80% target. As with the 80% target, it is expected that interim targets will be put in place to ensure targets are being met over time.

43. In March 2019, the Council declared a Climate Emergency, declaring the ambition to meet carbon neutrality in the borough by 2030. This is a strategic issue currently being overseen by strategic directors in the Council. A Supplementary Planning Document (SPD) is due to be published in the following year to advise how these ambitions can be achieved. The main points of focus that are being reviewed are:

- Sustainable transport
- Retrofitting existing housing stock
- Improving future housing stock

44. The current policies of the NSP are sufficient to promote each of these three strategic priorities.

Southwark's opportunity areas, site allocations and area visions

45. The New Southwark Plan identifies opportunity areas that have been targeted for development for Aylesbury, Bankside, Bermondsey and the Blue, Blackfriars Road, Camberwell, Canada Water, Dulwich, Elephant and Castle, Herne Hill, London Bridge, Old Kent Road, Nunhead, Peckham and Tower Bridge Road. The new developments coming forward in these opportunity areas are essential to meet Southwark's sustainable development targets. Significant growth and contribution to the sustainable targets is expected from these areas, with several schemes already in the pipeline awaiting delivery.

3.4 P24 River Thames / P57 Open water space

3.4.1 Background to Policy P24 and P57

46. Policy P24 and P57 provide the approach towards development in relation to the River Thames, which Southwark is bound by, setting strategies for how public space around the River Thames should be treated (P24) and what development is permitted on open water space in preserving the integrity of open spaces initiative (P57).

47. **Table 3:** sets details on how Policy P24 and P57 have evolved through different stages of the Plan and highlights the key changes at each stage.

Table 3: evolution of the New Southwark Plan Policy P24 – River Thames and P57 – Open Water Spaces

| Policy | NSP O (2014) | NSP PO (2015) | NSP PSV (2017) | NSP Submission (2019) |
|------------------|---|--|--|---|
| P24 River Thames | <p>DM56 River Thames</p> <p>Conserve and enhance strategic importance of River Thames and hinterland</p> <p>Integrate successfully with the waterspace, its use, appearance and physical impact</p> <p>Sustain historic character</p> <p>Mix of uses appropriate to their location next to the river including public open spaces (inclusive,</p> | <p>DM20: River Thames</p> <p>Integrate successfully with the water-space in use, appearance and physical impact</p> <p>Successfully relate design principles Including LVMF views</p> <p>Avoid unacceptable harm or impacts on navigation, biodiversity, heritage assets in Thames Policy Area</p> | <p>P22 River Thames</p> <p>No Change</p> | <p>P24: River Thames</p> <p>No Change</p> |
| P57 Open Water | <p>spaces (inclusive,</p> | <p>DM52: Open space and open water space</p> | <p>P57 Open</p> | <p>P57 Improve our open</p> |

| | | | | |
|-------|--|--|-------------------------------------|--|
| Space | <p>accessible, active waterside and ground level frontages)</p> <p>Access points</p> <p>Docks protected</p> <p>Sustainable design to flood risk / flood defence wall</p> <p>Biodiversity</p> | <p>Development not permitted unless</p> <p>Must enhance borough regional open space initiatives</p> <p>New publicly accessible open space in development</p> | <p>Water Space</p> <p>No change</p> | <p>water spaces</p> <p>Safety / navigational impacts minimised</p> <p>Health-wellbeing, recreation, quality of life and cohesive communities</p> |
|-------|--|--|-------------------------------------|--|

48. The strategic importance of development policy P24 is to guide development within the Thames Policy Area. It overarching protects public access, both visual and physically, to the River Thames, which as a shared open space provides value to the borough. Specific requirements of the policy ensure what is measured above.

49. P24 and P57 were split during the preferred options version where, P24 focuses on the value of the River Thames to be protected from physical development, whereas P57 recognises the value of the River Thames for its strategic designation as Open Water Space. P57 identifies the wide-ranging environmental benefits of Open Water Space, the designation of Open Water Space, and the specific treatment of this designation.

50. These policies protect development on or near the River Thames. It limits proposed development from reducing the amenity value of open water space in the borough and ensures heritage value is maintained (P24). This ensures that open water space designations are protected from development of ancillary facilities that can harm the accessibility, setting, quality or usefulness of the space, as specified by the requirements of this open space designation (P57).

3.4.2 Consultation Responses Summarised

51. The consultation responses received to the Proposed Submission Version (PSV 2017) of Policy P24 and P57 mainly queried that:

- Houseboats should be supported for their contribution to housing need
 - a. This comment would not change the protection of the asset, but would impact the way housing targets were identified, however due to the inherent moveable nature of houseboats, these do not fulfil the definition of increased housing need.

3.4.4 Strategic Importance of Designated Open Water Spaces and the River Thames

52. The north of Southwark boundaries the River Thames and the borough has a long history of riverside development. This includes tangential ward boundaries with the River Thames for Bankside, Borough and London Bridge (Cathedral Wards), Bermondsey & Old Kent Road (Riverside Ward) and Canada Water (Rotherhithe Ward and Surrey Docks Ward).
53. The ambition to promote social inclusion, tackle deprivation and discrimination by ensuring that the River Thames and the Thames Path are accessible to everyone is one of the main targets of this policy. One way of doing this is by making the most of the existing opportunities to utilise and enhance publicly accessible linear green routes in the borough. **98 ha** of the total of **518ha** of all open space in the borough designated as a Site of Importance for Nature Conservation (SINC) (2016) is open water space.
54. Fig 1 from the SINC's evidence-base paper (2016) shows that open water space has increased by 11% between 1994 and 2015. This supports local biodiversity. The increase in water habitats includes Lavender Pond, Surrey Waters and Dulwich and Sydenham Golf Course added in 2015. The industrial docklands have historically contained a large proportion of the borough's standing water resource and also supported substantial areas of newly created wetland. Wetland habitats were often small and occurred around the periphery of standing water which was difficult to map accurately. On large sites, these areas would have been target noted and mapped as standing water. They therefore are not completely relevant when considering preferential development types along water boundaries.

Figure 3: Bar chart showing habitat change between 1994 and 2015 with percentage change for widespread and abundant habitats

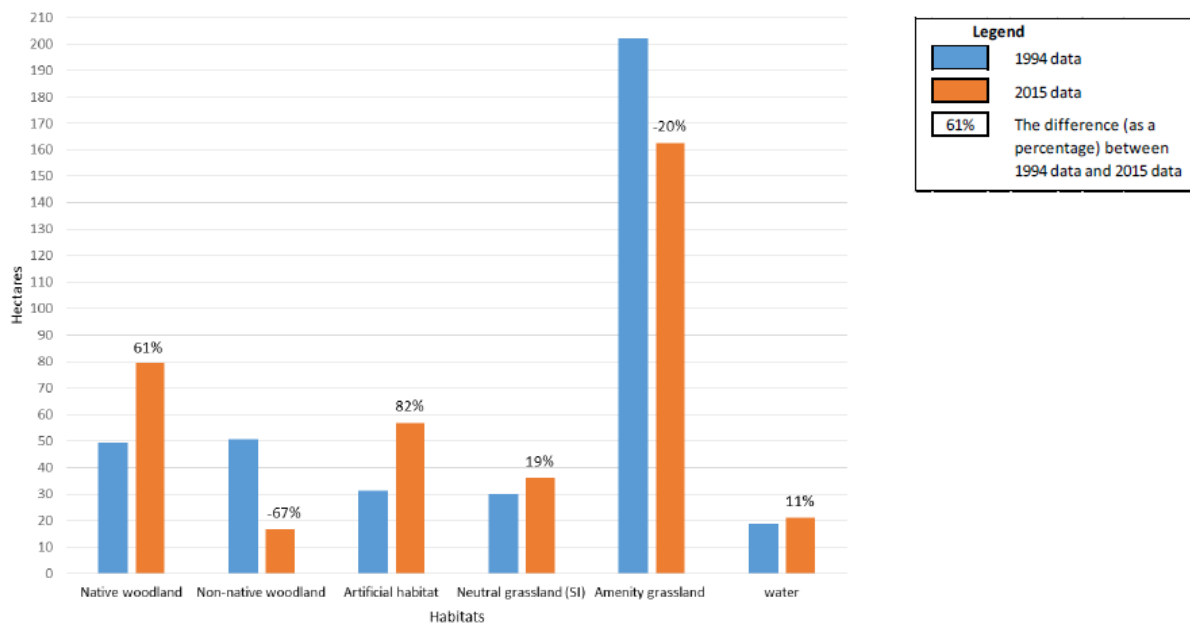


Fig 1: Water habitat has increased by 11% between the periods of 1994 and 2015.

55. P24 and P57 are important in face of alternative methods of living, such as “river living” where network’s of decks, podiums and pavilions connecting new residential moorings and floating communities. Current policy in the NSP would not allow for this type of housing typology. Challenges to implement would include wash, tidal range and regulating river transport. No guidance has yet been published on how river living would become a prominent part of our development management policies.

56. Climate change is likely to affect river and coastal flood risk in the next decades, which was noted in the July 2019 Climate Change summit held at Southwark Council as part of the ‘Declaration of Climate Emergency’. Certain forms of river-living and adapting to waterside will be a consideration in the future action towards the Climate Emergency in the borough. This housing typology has not been considered in the Local Plan because there is not sufficient evidence or guidance to support the adaptation to river living as a viable development typology.

57. It should be noted that the South East Marine Plan¹ developed by the Marine Management Organisation (MMO) is currently under development with a consultation draft due in early 2020, which could effect future iterations of these planning policies.

3.4.5 Blue Ribbon Network in Southwark

58. Policy 7.24 of the adopted London Plan is titled the Blue Ribbon Network, which emphasises the importance of linking spaces to improve overall quality and sustainability of London. The reasoning behind this is similar to that of green infrastructure and in fact green infrastructure is considered to include the Blue Ribbon Network. By prioritizing uses of waterspaces and land alongside it safely for water related purposes regard should be paid to the Thames River Basin Management Plan.

59. The Blue Ribbon network is a spatial policy covering London's waterways and water spaces and land alongside them, including the Thames, the canal network, other tributaries, rivers and streams within London and London's open water spaces such as docks, reservoirs and lakes.

60. Homes are being built rapidly, with most of the change taking place in the north and centre of Southwark, predominantly in Elephant and Castle, Canada Water, Old Kent Road, Blackfriars Road, Bankside and along the River Thames. This policy ensures that development that does impact waterspace amenity effectively protects amenity value for the rest of the community. Working in partnership and consulting with Riverside organisations ensures that their opinions on how spaces around water networks should be changed are considered at all times.

61. There is potential to enhance the network of spaces that are on, or close to, the Thames Path, as well as routes from open spaces to the Thames;

- Greendale and Surrey Canal Walk, Deal Porters Walk, Surrey Canal Walk to Peckham, Russia Dock Woodland to Durrand's Wharf and Greenland Dock and the Thames Path;

¹ South East Marine Plan, Marine Management Organisation
<https://www.gov.uk/government/collections/south-east-marine-plan>

- The Thames Path is a key route through the sub-area. The Thames itself is perhaps Bankside's most important open space and helps to define the character of the sub-area. There is potential to provide links from other parts of the sub-area to link into the Thames Path.
- Proposals to address deficiencies include improving the public realm and provide links to Bankside and the Thames Path, linking in with the Bankside Urban Forest Framework.

62. There is also potential to link to other parts of the borough, including Bankside, Bermondsey and Aylesbury. Green links should be provided to the Thames Path, Kennington Park, Southwark Park and the improved Burgess Park.

63. The benefits of improving links from the Thames Path into Russia Dock Woodland and the other points of interest expressed below would have the potential to improve travel time. Further detail on how this will be achieved with the Bankside, Borough and London Bridge Supplementary Planning Document (SPD) is currently at draft stage.

National Planning Policy Framework (NPPF) (February 2019)

64. Consideration of water space falls under the same paragraphs of designation as other open space as open space is defined in the NPPF 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.”²

65. Paragraph 96-101 outline the importance for individual boroughs to base their policies on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualities deficits or surpluses) and opportunities for new provision.³ This information will be set out in the final section of this paper.

66. The MOL review that is provided in the final chapter of this report assesses open water space and the River Thames as part of the open spaces as categorised by opportunity

² NPPF 2019 (pp. 69)

³ NPPF 2019 (pp.28-29)

area. This will assist with the overarching goals to “make more effective use of sites... and access to open space”.⁴

67. The relevant planning policy guidance for open water space review would have the same limitations as the “PPG Open space, sports and recreation facilities, public rights of way and local green space”, which will be addressed in further detail under the open space policy.

68. There is no supplementary guidance from the Mayor or Central government on waterside development and any additional assessment requirements that this may entail, therefore the same assessment criteria will be used for open water space and open space.

New London Plan (emerging 2019)

69. Paragraph 8.6.1 suggests London’s water spaces are designated as SINCs, as they make up an important set of habitats in London.

70. Policy SI17 Protecting and enhancing London’s waterways addresses the multi-functional use, protection and development of water spaces, with a particular priority for improving and restoring those sections of river. The habitat value of waterways is a key element of their future management.

3.4.6 Conclusion

71. The quality of open water space will be considered using the criteria in the Open Spaces Appraisal outlined in the methodology in the final section of this report. This takes quality, measured through satisfaction ratings, quantity, and accessibility, into account, which support desirable protected characteristics of open water space. Protected open water space has overall increased in the borough since the previous open space survey in 2003, and greater consideration in the impacts of amenity and ancillary facilities on value of open water space has been considered in the evolution of this policy.

3.5 P57 Open Space

⁴ NPPF 2019 (pp. 36)

3.5.1 Background to Policy P57

72. The evolution of the open space policy has become more specifically defined to protect MOL, BOL and OOS designations, whereas in previous iterations it also included open water space and biodiversity. Splitting the content of these policies has allowed them to become more objective and clear in what they are requiring of development.

73. The current Open Space policy looks solely at the functions of MOL, BOL and OOS designations. It is therefore relevant to the introduction to MOL and Green Belt that was provided in the strategic policy overview for this paper.

74. **Table 4** sets details how the New Southwark Plan policies have evolved through the different stages of the Plan and highlights the key changes at each stage. These amendments have been informed by consultation responses received and further evidence base documents being prepared.

Table 4: evolution of the New Southwark Plan Policy P57 – Open Spaces

| Policy | NSP Options (2014) | NSP Preferred Options (2015) | NSP Proposed Submission Version (2017) | NSP Submission (2019) |
|-----------------|--|---|---|--|
| P57: Open space | <p>SP11 Open Space and Biodiversity</p> <p>Protect and improve its network of open spaces: open, attractive, sport, leisure, food growing opportunities and protection of wildlife habitats</p> <p>DM57: Open Space</p> <p>Sustain and enhance open spaces strategic network and provide new</p> | <p>DM52: Open space and open water space</p> <p>No change</p> | <p>P56 Open Space</p> <p>Removed provide new publicly-accessible open space according to size</p> | <p>Protect and enhance residents' access to green open space in the borough</p> <p>Development not permitted on MOL or BOL unless:</p> <p>Ancillary sports recreation facility OR positively contributes to the setting (particularly accessibility and quality of the open space)</p> |

| | | | | |
|--|---|--|--|--|
| | publicly-accessible open space appropriate to size | | | |
|--|---|--|--|--|

3.5.2 Consultation responses summarised

- Maintenance of open space is not sufficiently covered
- Educating children / connecting with nature lacking clarity
- Ineffective in addressing health and wellbeing needs of residents
- 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
- This policy 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.
- ‘Ancillary facilities’ not usefully defined
- Facilities should positively contribute to both openness and character of the open space
- There is not enough focus on increasing green space in areas of current regeneration focus, and where open space is currently deficient
- More transparency in order to monitor open space provision
- GLA process of selecting SINC

3.5.3 Strategic Importance of MOL and Metropolitan Open Land Review

National Planning Policy Framework (NPPF) (February 2019)

75. Given that MOL and Green Belt are afforded the same status and protection, the NPPF Green Belt policy is considered to apply to MOL and it is equally important to understand the Green Belt policy context.

76. Green Belt and Metropolitan Open Land are described in paragraph 96, 171 and the following chapter on Metropolitan Open Land, and Paragraphs 7-9 of the NPPF 2019. ‘English National Parks and the Broads: UK Government Vision and Circular’ (2010)

provide further guidance and information about their statutory purposes, management and other matters.

77. For the purposes of paragraphs 172 and 173, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. 'Major development' in Southwark has been defined in the Glossary of the New Southwark Plan.

78. National Green Belt policy as set out in the 2019 NPPF places 'great importance' on the Green Belt, and seeks its protection through preventing urban sprawl and keeping land permanently open. The NPPF defines Green Belt's essential characteristics as its 'openness and permanence'. Green Belt is considered to have five key purposes, these are:

1. To prevent unrestricted sprawl of large urban areas;
2. To prevent neighbouring towns merging into one another;
3. To contribute to the safeguarding the countryside against encroachment;
4. To preserve the special character and setting of historic towns; and
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

79. Once established, Green Belt boundaries can only be altered in exceptional circumstances, which must be fully justified and evidenced in updated plans. This will be assessed at an examination considering whether:

1. Brownfield and underutilised land have been made as much use of as possible;
2. Minimum density standards have been achieved in town and city centres; And
3. There have been discussions with neighbouring authorities about whether
4. They could accommodate some of the required development.

80. The NPPF requires authorities to consider sustainable patterns of development by directing development into urban areas. This includes ensuring the redevelopment of brownfield land is maximised and density of development is optimised before amendments to Green Belt boundaries are considered. There is also a requirement to

demonstrate how any removal of Green Belt land will be compensated through improvements to the quality and accessibility of remaining areas of Green Belt.

Planning Practice Guidance 17: Compliant Open Space Study (updated July 2019)

81. The National Planning Practice Guidance (PPG) provides supplementary guidance on the requirements of the planning system presented in the NPPF. Although the PPG section relating to Green Belt provides no guidance on how to conduct a Green Belt Review, it does include details on how to assess the impact of potential development on Green Belt Land. These are given as:

- The impact of the proposal on the spatial and visual aspect of openness;
- The duration of the development and its remediability (e.g. any provisions to return the land to original state or similar); and
- The degree of activity, such as traffic, likely to be generated by the development.

82. Further guidance is also provided on strategies to compensate for the removal of land from the Green Belt. Strategies could include providing new or enhanced green infrastructure, planting new woodlands, landscape or visual enhancement beyond those needed to mitigate the proposal, habitat improvements, new walking or cycling routes or new or enhanced recreational provision. Whilst implementing such measures, the guidance states that consideration will need to be given to land ownership, the scope of works required to deliver the compensation, and the use of planning conditions, section 106 agreements or Community Infrastructure Levy.

New London Plan (emerging 2019)

83. Details on how the New London Plan and its Inspector's Report (2019) have been reviewed in regard to MOL and Green Belt policy is provided in full detail in the Policy Background Context section of this paper.

Saved Southwark Plan (2007)

84. There are three detailed policies which relate to the protection of open space in the borough identified in the adopted Southwark Plan. All policies have been saved and, as such, form part of the Development Plan:

- Policy 3.25, which states that there is a general presumption against inappropriate development on Metropolitan Open Land (in line with the London Plan).

- Policy 3.26, which states that permission, will not be granted for development on borough Open Land unless it meets five criteria to ensure that the function and role of the open space is not compromised.
- Policy 3.27, which states that permission, will not be granted for development on Other Open Space unless it meets five criteria to ensure that the function and role of the open space is not compromised, or that the open space is re-provided to a similar level of quality within 400m of the original space.

85. The adopted Local Plan also identifies a schedule of MOL, BOL and OOS, along with a detailed typology for each space identified from the work undertaken as part of the 2003 Open Space Study. This was updated in 2013 to form the Open Space Strategy and 2010 evidence-base, which is referenced as part of the MOL appraisal methodology in the final section of this background paper.

Core Strategy (2011)

86. The Southwark Core Strategy was adopted in April 2011 and also forms part of the adopted Development Plan for the borough.

87. The key policy with regard to open space is Strategic Policy 11 – Open Spaces and Wildlife, which seeks to ‘improve, protect and maintain a network of open spaces and green corridors that will make places attractive and provide sport, leisure and food growing opportunities for a growing population’ by:

- Continuing to protect important open spaces from inappropriate development. These will include parks, allotments, sports grounds, green chains, sites of importance for nature conservation (SINCs) and cemeteries. Large spaces of importance to all of London will be protected (Metropolitan Open Land) as well as smaller spaces of more borough-wide and local importance (Borough Open Land and Other Open Spaces).
- Protecting woodland and trees and improving the overall greenness of places, including through promoting gardens and local food growing.
- Promoting and improving access to and links between open spaces.
- Identifying and protecting open spaces that provide quiet areas and relative tranquillity.
- Requiring new development to help meet the needs of a growing population by providing space for children’s play, gardens and other green areas and helping to

improve the quality of and access to open spaces and trees, particularly in areas deficient in open space.

- Requiring new development to avoid harming protected and priority plants and animals and help improve and create habitat.

88. The policy recognises that the largest open spaces in the borough are protected by the Mayor as part of the Metropolitan Open Land (MOL) designation. These have the highest level of protection and must be kept open in nature with development only in exceptional cases. This essentially reinforces policy 3.25 of the UDP.

89. The policy also reinforces policies 3.26 and 3.27 of the UDP which seek to protect Borough Open Land and Other Open Space.

90. No open space standards are identified within the Core Strategy and there is no specific analysis of the different typologies of open space outside the SINC's. However, the borough's S106 SPD (2007) does provide some further details on open space standards.

Section 106 Planning Obligations SPD (2007)

91. The borough's Section 106 Planning Obligations SPD provides guidance that expands on the policies concerning planning obligations in the Southwark Plan (UDP 2007). The SPD states that applications for ten residential units and above will be required to contribute to public open space; children's play equipment and sports development. The SPD also suggests that, in areas of district park deficiency, the council will seek to secure additional contributions towards open space provision.

Infrastructure Plan (2017)

92. With increased population and demand for open space and limited opportunities to create new open space, the focus is to improve the quality and value of existing open spaces through enhancements and also create better links between existing parks and open spaces. Improving access to existing open spaces, particularly in areas of deficiency, is a key priority for some of the existing more developed areas; particularly in the growth areas where specific development opportunities might arise that could open up new access routes to existing spaces or help to fund proposals that are identified through the Open Spaces Strategy (2013). The Infrastructure Plan (2017) is published with the submission of the New Southwark Plan and is regularly monitored.

3.5.4 Conclusion

93. In conclusion an assessment of all open space to inform policy, identifying areas of public-open space deficiency is required, taking into account quality, measured through satisfaction ratings, quantity and accessibility.

3.6 P58 Green Infrastructure

3.6.1 Background to Policy P58

94. This policy ensures that networks and linkages between open spaces are strategically identified and maintained. Green chains provide additional amenity value for ease of movement, protecting local distinctiveness and architectural character and ensuring biodiverse habitats are continued throughout the borough.

95. **Table 5** details how the New Southwark Plan policies have evolved through different stages of the Plan and highlight the key changes at each stage. These amendments have been informed by consultation responses received and further evidence base documents being prepared.

Table 5: Evolution of the New Southwark Plan Policy P58 – Green Infrastructure

| Policy | NSP Options (2014) | NSP Preferred Options (2015) | NSP Proposed Submission Version (2017) | NSP Amended Policies (2019) | NSP Submission (2019) |
|---------------------------|---|------------------------------|--|-----------------------------|---|
| P59: Green infrastructure | DM60: Urban Greening and Green Infrastructure Delivery of green infrastructure through the retrofitting of buildings and | P58 Green infrastructure | P58 Green infrastructure | P58 Green infrastructure | Multifunctional and integrated green infrastructure network that secures benefits to biodiversity and ensure planning decisions incorporate green |

| | | | | | |
|--|--|--|--|--|---|
| | the public realm, including sustainable drainage | | | | <p>infrastructure links</p> <p>Maintain and enhance existing green infrastructure</p> <p>Reincorporate infrastructure that improves connections between designations</p> <p>Contribute to the management and improvement of green infrastructure networks</p> |
|--|--|--|--|--|---|

3.6.2 Consultation responses summarised

- Ensure that developers provide sufficient greenspace provision in relation to their size
- London’s Urban Greening Factor (UGF) should be included and adopted while the borough is developing a borough-specific tool to measuring the green infrastructure requirements created by major developments
- Should show the network of green corridors, mapping existing and proposed green corridors
- 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

- No mechanisms of evaluating negative impact on vital ecosystem services of major developments and determining the value of green infrastructure for different kinds of people and means
- No emphasis on converting spaces to create new additional green infrastructure (i.e. by removing car parking and space for motor vehicles)
- Integrating green spaces is not clear
- Greater indication of the value of green infrastructure for the community in the requirements of this policy
- Greater account of existing vegetation, habitat connectivity

3.6.3 Issues to consider

National Planning Policy Framework (NPPF) (February 2019)

96.Paragraph 81 suggests that just like open spaces, green infrastructure is deemed to enable and support healthy lifestyles.

97.Paragraph 150 indicate that green infrastructure contribute to avoid increased vulnerability to the range of impacts arising from climate change. Green infrastructure is seen as suitable adaption measures, where new development is brought forward and could be vulnerable to climate change.

98.Paragraph 171 strategic approach to maintain and enhancing networks of habitats and green infrastructure

99.Paragraph 181 includes opportunities to improve air quality or mitigate impacts should be identified through traffic and travel management and green infrastructure provision and enhancement. While reference to open spaces indicates air quality improvements, equally tenuous to green infrastructure

PPG Natural Environment (2016)

100. The ambitions of green infrastructure should be to help:
- Build a strong, competitive economy
 - Achieve well-designed places
 - Promote healthy and safe communities
 - Mitigate climate change, flooding and coastal change

- Conserve and enhance the natural environment

101. This guidance encourages strategic policies to locate existing and proposed green infrastructure networks for their protection and enhancement, to set out appropriate policies for their protection and enhancement. Section 5 of this paper assesses the existing Green Links in Southwark.

New London Plan

102. Green infrastructure is similar in its protection weighting as MOL, which in the draft London Plan (2019), Policy G3 protects MOL from inappropriate development, including development which has the potential to harm MOL, and encouraging the enhancement of quality and range of uses for MOL.

103. Green belt policy (G4) as described above indicates the specific value of a green chain if it forms a link or network of green infrastructure and meets one of the following criteria:

'It contributes to the physical structure of London by being clearly distinguishable from the built-up area

It includes open area facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve the whole or significant parts, of London

It contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value)

National Capital Account for London's Public Parks

104. Supplementary Planning Guidance on the All London Green Grid. Policy SD3 (Growth locations in the Wider South East and Beyond) suggests that the Mayor will work to ensure growth targets do not intrude on its Green Belt or other protected open spaces.

The Greener Belt Strategy

105. Whilst the GLA have committed to delivering tens of thousands of homes to London, London's Green Belt have been protected and extended, with the target to make London **more than 50% green by 2050.**⁵

Southwark Living Streets

106. Southwark Living Streets and Southwark Cyclists have developed a proposal for a network of safe walking and cycling routes in Southwark. Although the proposal does not represent the Council's current policy objectives, it does provide a useful starting point from which to identify potential links between spaces.

3.6.4 Previous Issues in Southwark for Establishing Links between Open Spaces

107. The following points should be considered when identifying links between open spaces.

- Where possible routes should be in green spaces an off -road. However, there are limited opportunities to create truly off -street green links within the borough;
- There are opportunities to utilise and enhance publicly accessible linear green routes such as Greendale and Surrey Canal Walk, Deal Porters Walk, Surrey Canal Walk to Peckham, Russia Dock Woodland to Durrand's Wharf and Greenland Dock and the Thames Path;
- Where off -road routes are not possible, quieter, suburban, tree-lined streets should be identified as potential links between spaces. This may require the enhancement of the public realm and the introduction of pedestrian and cycle crossings at particular locations to address severance issues. DfT's Manual for Streets provides guidance on how to provide pedestrian-orientated environments;
- Suburban street patterns can often be disorientating and many of the borough's green spaces are hidden from view. The network will need to be clearly signed, potentially accompanied by maps produced by the Council;
- There is potential to include historical, ecological and cultural information as part of these walks for leisure purposes;
- The network would need to link in with other walking and cycling initiatives including the Green Chain Network and the borough's cycle routes;

⁵ Greater London Authority, London Environment Strategy, adopted May 2018

- There is potential to enhance the network of spaces that are on, or close to, the Thames Path, as well as routes from open spaces to the Thames;
- Greening streets by planting appropriate species of trees is one of a series of measures which can be employed to improve links between open spaces. Trees provide the aesthetic qualities required in softening the hard edges of the built environment and assisting in limiting or buffering harmful emissions of air and noise pollution;
- To maximise ecological and biodiversity benefits an appropriate tree density would be approximately 80 trees per linear km or 2 per 25m on each side of the street, whichever is the greater. This would provide a continuous coverage of tree crown cover for a typical London Plane tree;
- In the context of greenway links, trees have further benefits in that tree lines can provide a buffer between the footway and the carriageway and can help give guidance to routes. The planting of trees will also help to ensure that walking and cycling will be a more pleasant activity, even next to a busy road, continuing the greenway aesthetic onto the trafficked highway; and
- Trees act as a filter to trap toxic particles including lead and absorb gases such as carbon monoxide and sulphur-dioxide. Noise pollution is an increasingly serious form of pollution and trees can help filter out sound and provide a barrier against the drone of a busy road. Trees also provide habitats for a wide range of wildlife. They can increase the biodiversity of an area, helping to bring the countryside to the doorstep.

3.6.5 Enhancing the Recreational Role of Spaces

Infrastructure Plan

108. Southwark produced a Delivery and Implementation Plan (DIP) in 2010 to support the implementation of the Core Strategy policies. The DIP includes green infrastructure projects. This will be updated and monitored when possible.
109. Buffer areas of natural open space will provide 'green chains' to support the movement of wildlife through the borough as well as for walking and cycling. The Council is continuing to support development of new and existing corridors in partnership with the Mayor of London's 'All London Green Grid' strategy which seeks to provide linkages between existing natural open spaces at a regional scale. The costs below focus on capital costs.

110. Our draft open space policy AAP10 in the Old Kent Road Area Action Plan requires a 5m² of public open space per residential unit. If this is not provided on site, a financial contribution is secured through Section 106 and this will be available to improve existing parks and green public realm within the opportunity area.
111. The Council is exploring ways to link new parks and spaces with existing networks such as East Walworth Green Links. The linkages between parks as a main corridor for movement are given particular emphasis in our proposal for a Linear Park. This includes a mix through a Draft Linear Park Design Guidelines which as well as working strategically. Patel Taylor architects have been commissioned to prepare a detailed design guidelines document for the Old Kent Road Linear Park which will act as an overarching future design guide for the park, as each parcel of development is put forward. Local communities will be engaged from early draft of this strategy to ensure that they have a sense of ownership of the approach.
112. One of the design techniques used is to have the surrounding approved developments at Cantium, Nye's Wharf and Malt Street to have a rich mix of land uses on their ground floor including offices, retail, gallery space, light industrial uses and cultural destination spaces with active frontages to form different character areas within the park. Thereby the gateway to the park from the Old Kent Road would establish a presence on the actual Old Kent Road streetscape, currently heavily trafficated, to improve access to the open, green space. This is an example of beneficial use of green infrastructure.



Publicsquare

- This would be a good location for a farmers market.
- Close to north/south and east/west bus routes
- Not far from the future tube station
- Off Old Kent Road so benefitting from visibility
- Hard landscaped
- Works well with “High Street” frontage and is complementary
- Has good access for vans and parking space for deliveries should include some taps for water use for stall holders and maybe access to toilets.

Fig 2: Rooms off the park- Cantium Linear Park

1. Linear Park gateway onto Old Kent Road
2. Main circulation to north of park
3. Secondary circulation to south of park
4. Cross-routes pick out key north / south desire lines, connect to urban square and adjacent parcels and sub-divide park
5. Spill-out to block C commercial uses
6. Large lawn spaces to centre of park support activity
7. Localised seating pockets to edges
8. Play within 'wharf' area.
9. Connection to Linear Park on adjacent plot and across Old Kent Road
10. Connection to Livesey Place
11. Water at key points along park
12. SUDS as part of water theme within park
13. Semi-mature trees reinforce key routes and provide seasonal interest
14. Indicative locations for artwork along park

113. Other examples of additions to green infrastructure benefits that are being scoped to be provided by the Linear Park in the Old Kent Road AAP include:

- Artwork can celebrate the history of the site such as the former Surrey Canal and can be discreetly integrated such as in the paving or displayed in the shopfronts of the buildings.
- The existing parks within the area are popular with runners, particularly running loops around the larger spaces like Burgess Park. The attached map shows that the

existing set up in Old Kent Road prevents connection between spaces. By providing a dedicated jogging route in the park we will create opportunities for exercise, reinforcing this by having outdoor gyms along the way.

- Including spaces that have opportunities for gathering and events including an outdoor cinema and includes a dedicated play area.

Greener Belt Strategy

114. The AAP proposes a Greener Belt strategy seeks to create an inner London network of green spaces the links Southwark's major parks and those in Lewisham and Lambeth through the creation of new parks (Image attached). Our 2018 consultation questionnaire showed circa 70% support for this strategy and we have used the concept to engage with local groups.

115. There is also currently in draft, a management document for Parks and recreation in the Old Kent Road Opportunity Area. This will ensure coherency between the management structure and design guidelines for developing the three main new parks in the OKR AAP (Linear, Cantium and Malt St).



Fig 3: Greener Belt Strategy shown with South-East London Opportunity Areas highlighted in brown⁶

116. The greener belt strategy also promotes the provision of sustainable urban drainage and the promotion of rain gardens like those found in the Lendlease development in Elephant & Castle. These also help mitigate air pollution from roads. With this in mind we are exploring the idea of greening the large pavements at Rotherhithe New Road and Rolls Road.

3.6.6 Conclusion

117. Green infrastructure dominates discussions of designating new open space, as taken into consideration from the very earliest stages of development of an Area Action Plan. The Old Kent Road AAP is an example of how green infrastructure can be established and be improved through regeneration in the borough. Regeneration provides an opportunity for new green links to be improved and maintained which support sustainable modes of transport can flow, including cycling and walking, and improve health and recreational benefits attributed with open spaces.

3.7 P59 Biodiversity

3.7.1 Background to Policy P59

118. The Biodiversity policy is dependent on the network of open spaces designation, as these designations protect required habitats for different species to growth. The habitats are monitored in Southwark's Sites of Interest Nature Conservation (2016)⁷ and action plan to improving these sites are provided in the Biodiversity Action Plan (2013)⁸ currently in draft to be updated in 2020⁹.

⁶ Greater London Authority (GLA), London Environment Strategy, adopted May 2018

⁷ LB Southwark, 'Southwark's Sites of Interest for Nature Conservation' (published 2015)

⁸ LB Southwark, 'Southwark Biodiversity Action Plan 2013.'

⁹ LB Southwark, 'Draft Biodiversity Action Plan 2020. Protecting Biodiversity and Making Nature Accessible for All' (in consultation 2019)

119. The Biodiversity policy has not changed significantly through different iterations of the policy. Instead in the most recent iteration has includes the suggestion of green and brown roofs, green walls, soft landscaping, nest boxes, amongst the suggested landscaping principles to be included to improve biodiversity. Previously these design principles were separated into a Landscaping and urban design policy, but this has now come to be included in the Biodiversity policy for the responsibility of developers to ensure biodiverse habitats are maintained.

120. **Table 6** details how the New Southwark Plan policies have evolved through different stages of the Plan and highlight the key changes at each stage. These amendments have been informed by consultation responses received and further evidence base documents being prepared.

Table 6: Evolution of the New Southwark Plan Policy P59 – Biodiversity

| Policy | NSP Options (2014) | NSP Preferred Options (2015) | NSP Proposed Submission Version (2017) | NSP Amended Policies (2019) | NSP Submission (2019) |
|-------------------|--|------------------------------|--|-----------------------------|---|
| P60: Biodiversity | DM58: Biodiversity Development must avoid harm to: <ul style="list-style-type: none"> • biodiversity including expansion of green infrastructure and landscaping • SINCS/LNRS DM 39: Urban Design 39.1.7 Landscaping | DM53: Biodiversity | | | Green and brown roofs, green walls, soft landscaping, nest boxes, habitat restoration and expansion, improved green links and buffering of existing habitats. |

3.7.2 Consultation responses Summarised

121. The consultation responses received to the Proposed Submission version of Policy P60.

- No strategic issues were brought up as part of the consultation responses; instead it was minor wording changes etc.

3.7.3 Biodiversity Targets

National Planning Policy Framework (NPPF) (February 2019)

122. Paragraph 8c recommends plan-making to take a proactive approach to mitigating and adapting to climate change should be taken into consideration for the long-term implications for biodiversity, amongst other things.

123. Conserving and enhancing the natural environment are explicitly drawn out in Chapter 15 starting with Paragraph 170. This paragraph requires:

- Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils
- Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- Soil pollution, air quality etc.

124. Habitats and biodiversity specifically described in paragraphs 174 and beyond, which reads:

“To protect and enhance biodiversity and geodiversity, plans should:

- *a) Identify, map and safeguard components of local wildlife-rich habitats and wider 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 national and local partnerships for habitat management, enhancement, restoration or creation; and*

- *b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*¹⁰

125. The priority habitats and species mentioned above refer to those which have been identified as being the most threatened and requiring conservation under the UK Biodiversity Action Plan. Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011), and the UK Post 2010 Biodiversity Framework (2012), which replaced the England Biodiversity Strategy and the UK BAP, have resulted in changes to the terminology. At the National Level priority habitats and species are now referred to as Habitats and Species of Principal Importance for the Conservation of Biodiversity in England under the NERC Act 20062 (hereafter referred to as 'Species of Principal Importance' and 'Habitats of Principal Importance'). At regional and local levels the former are still in use.

PPG Natural Environment - Biodiversity Section (2019 updated)

126. The natural environment PPG was updated in July of this year to include a new section on biodiversity and net-gain.

127. Plans, and particularly those containing strategic policies, are encouraged to set out a suitable approach to biodiversity and wider environmental net gain, how it will be achieved, and which areas present the best opportunities to deliver gains. Such areas could include those identified in:

- natural capital plans;
- local biodiversity opportunity or ecological network maps;
- local green infrastructure strategies;
- strategic flood risk assessments;
- water cycle studies;
- air quality management plans;
- river basin management plans; and
- Strategic protected species licensing areas.

¹⁰ NPPF 2019 (Paragraph 174)

128. Consideration may also be given to local sites including where communities could benefit from improved access to nature.
129. Information on biodiversity and geodiversity impacts and opportunities needs to inform all stages of development (including site selection and design, pre-application consultation and the application itself). An ecological survey will be necessary in advance of a planning application if the type and location of development could have a significant impact on biodiversity and existing information is lacking or inadequate. Pre-application discussions can help to scope whether this is the case and, if so, the survey work required.
130. Even where an Environmental Impact Assessment (EIA) is not needed, it might still be appropriate to undertake an ecological survey, for example, where protected species may be present or where biodiverse habitats may be lost.
131. As with other supporting information, local planning authorities should require ecological surveys only where clearly justified. Assessments should be proportionate to the nature and scale of development proposed and the likely impact on biodiversity. Further guidance on information requirements is set out in making an application.

Environmental Bill (presented 2019)

132. In 2019, Defra introduced an Environment Bill that contains several measures with implications for the planning system and the opportunities it provides to protect and improve the natural environment.
133. Key measures include:
- a mandatory duty on developers to provide for a 10% net gain in biodiversity, preferably locally to the development;
 - a new mapping system will identify opportunities to improve biodiversity at a strategic scale and can be used to inform development plans and the net gain process;
 - local authorities will be required to consult on proposals to fell street trees, and will have a strengthened duty to improve biodiversity when delivering their functions;
 - There will also be a new statutory body, the Office for Environmental Protection, with the power to enforce the proper application of environmental law.

134. A new Biodiversity Action Plan will be adopted in 2020 for Southwark indicating how key measures regarding biodiversity can be adopted.

London Plan (adopted 2016)

135. Policy 2.18 commits the Mayor to develop a multifunctional network of green infrastructure that secures benefits to biodiversity and commits the Council to making planning decisions that ensure development incorporates green infrastructure links. Paragraph “D” mentions SINC’s in relation to development proposals stating that the appropriate protection should be provided to sites in relation to their importance and including metropolitan, borough and local sites. Paragraph “F” requires LPAs to consider four aspects to the biodiversity resource in relation preparing Local Development Frameworks. These are replicated in full below:

- Identify and secure the appropriate management of sites of borough and local importance for nature conservation in consultation with the London Wildlife Sites Boards (LWSB);
- Identify areas deficient in accessible wildlife sites and seek opportunities to address them;
- Include policies and proposals for the protection of protected Habitats and Species of Principal Importance and the enhancement of their populations and their extent via appropriate regional and local BAP targets; and
- 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.

136. Policy 7.19 of the adopted London Plan requires protection, enhancement, creation, promotion and management of biodiversity. Planning for nature from the beginning, opportunities for positive gains for nature through the layout design and materials of development proposals. SINC regulation:

- a) Uses 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.
- b) Identifies areas deficient in accessible wildlife sites and seek opportunities to address them.

- c) Includes 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.
- d) Ensures sites of European or National Nature Conservation Importance are clearly identified.
- e) Identifies, protects and enhances corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites.

137. This policy is in support The Mayor's Biodiversity Strategy and ensures the LPA's commit to making planning decisions, which ensure development make a positive contribution to biodiversity through achieving Biodiversity Action Plan targets and having due regard to European or nationally designated sites and protected species. This policy also commits the Council to making planning decisions to ensure 'strong protection' to SMIs, with due regard to the mitigation hierarchy.

New London Plan (emerging 2019)

138. Policy G6 of the Draft New London Plan includes Biodiversity and access to nature continues the same requirements of the Biodiversity (Action Plans) where harm requires compensation. Development proposals that are adjacent to or near SINCs or green corridors should consider the potential impact of indirect effects to the site, such as noise, shading or lighting, identifying the holistic design requirements of this policy.

Mayor's Biodiversity Strategy (2015)

139. The Mayor's Biodiversity Strategy was updated in 2015 setting out new suggestions on the protection and enhancement of biodiversity through the planning system. The 12 generic policies set out in the strategy mainly refer to monitoring and best indicators to assessing biodiverse sites.

London Climate Change Partnership's 'Adapting to Climate Change: creating natural resilience' (2018)

140. Provides further guidance he network formed by biodiversity sites and the spaces between them will have a significant role in assisting biodiversity to adapt to climate change. The richness of London's biodiversity is also dependant on private gardens,

parks and open spaces and green corridors along canals and railways as well as on the River Thames and its tributaries (Policy 7.29) that allow essential interconnection between London wildlife sites.

Biodiversity Action Plan (2020)

141. Southwark Biodiversity Action Plan outlines how Southwark Council will work with its partners to conserve, enhance and promote biodiversity in the London. The five key objectives for the plan include:

- Objective 1 - To protect biodiversity in Southwark's parks and open spaces.
- Objective 2 - To enhance habitats in parks and open spaces.
- Objective 3 - Promote biodiversity in parks and open spaces.
- Objective 4 - Create a high quality sustainable environment through biodiversity actions.
- Objective 5 - To ensure that everyone has an equal opportunity to share prosperity within the borough and to improve the quality of life for those most disadvantaged through biodiversity actions.

Southwark Sites of Interest for Nature Conservation Review (2016)

142. All existing SINC citations were updated with information gathered from the GiGL species records (within the last 5 years), incidental records and species and habitat information collected from field surveys. New citations were written for proposed SINC's. Fuller information was provided in relation to the following where relevant:

- Main habitat types and their nature conservation value;
- Recorded Habitats of Principal Importance and London/ Southwark BAP habitats;
- Value of habitats to species and species groups;
- Recorded Species of Principal Importance and London / Southwark BAP species;
- Wider ecological value (e.g. as a habitat corridor);
- Current management;
- Current or proposed enhancement works;
- Value to the community;
- Threats and opportunities.

143. This adheres to Policy G6 Point B for providing up-to-date information about the natural environment and the relevant procedures to identify SINC's and ecological corridors to identify coherent ecological networks.

3.7.4 Conclusion

144. Achieving biodiversity is an outcome of successfully maintained, monitored and protected green infrastructure. The assessment methodology in Section 5 ensures the designation of open spaces supports our biodiversity corridors.

4. Open Spaces Appraisal Methodology

4.1 Introduction

145. This section provides a methodology for assessing the quality of designated Open Space through the presentation of four criteria. The four criteria focus on Open Spaces priorities in the borough which should:

- a. Be clearly distinguishable from the built-up area;
- b. Provide amenity value for leisure, recreation, sport, arts and cultural activity with London-wide importance;
- c. Be of historic, recreational and/or biodiverse value at either national or metropolitan level;
- d. Form part of a Green Chain or green infrastructure network.

146. The data utilised to provide the appraisal in this section is taken from the Open Space Strategy (2013) and evidence-base (2010).

4.2 Open Space Issues in Southwark

147. These issues are defined from the most recent publication of evidence-base documents relating to the issue.

Current Issues facing Southwark's Public Open Space¹¹

- The borough's population is expected to increase by up to 19% between 2011 and 2026, which is expected to significantly increase the demand for open space. With limited opportunities to create new open space, the focus will need to be on improving the quality of, and access to, existing open space to meet this increase in demand.
- The assessment of population density and deprivation reveals 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.
- Residents are generally happy with the quality of open space and recognise its contribution to quality of life. This was identified as part of the residents' survey and

¹¹ Southwark's Open Space Strategy (2013)

confirmed in the stakeholder workshop. However there is potential for improvement, especially at smaller spaces.

- The majority of residents walk to open spaces. There is a need to ensure that open spaces are accessible by foot. This means ensuring that routes to spaces are clear, severance barriers are addressed, signage is available, and entrances to spaces are welcoming and that there is sufficient provision within close to residential areas.
- There is strong support for linking up existing open spaces to improve accessibility and enhance the network of open spaces for biodiversity. Improvements to signage were seen as vital to improving links to spaces. Furthermore, open spaces need to be inviting and to have clear entrances that are welcoming to those not already familiar with the space.
- Safety is a key issue at many spaces. In response to consultation many residents said that they were not necessarily put off from using open spaces, but would like to see an increased presence of park attendees or wardens. There was also strong support for the potential to design out antisocial behaviour whilst providing activities for children and young people.
- The stakeholder consultation revealed that there is strong support for the development of more allotments and community gardens, including new sites within existing spaces and within small amenity areas.
- Although amenity spaces can be monofunctional and are often of poor quality, they are valued highly by the local community. They provide opportunities for informal recreation close to residential areas and have potential to be improved as a biodiversity and community gardening resource.
- Within parks a wider range of recreational opportunities should be provided to better meet the needs of those aged under 25 who had the lowest levels of satisfaction.
- Litter, dogs mess and the general cleanliness of the environment were major issues highlighted in relation to open space throughout the borough.
- Where appropriate, on-site amenities including benches and toilets should be provided in scale to the size and character of the space. Improvements to these facilities were identified as a priority by the residents' survey.
- Development of community gardens were seen as an important resource for the community in providing a space for active learning that is accessible to all, unlike allotments which traditionally have restrictive access.

- In larger parks, particularly those strong in biodiversity there is still potential to improve existing interpretation facilities. Such facilities could be accompanied by outdoor classrooms for use by school and community groups.
- There is a need to balance the use of open spaces for tourism and businesses, especially in the north of the borough, with the needs of local residents.
- Extensive consultation with residents confirms the need to continue to provide grave space in the Southwark's cemeteries. The council's Bereavement service is currently providing graves for around 30% of service users and research suggests that the demand for grave plots will remain constant at this level into the future.

4.3 Proposed Methodology

148. The methodology to inform future MOL Open Spaces appraisal is reflective of the policy guidance set out in the previous section. This includes four criteria assessed against a five point scale. Each MOL Open Space criterion is considered equally significant, and therefore no weighting or aggregation of scores across the criteria was undertaken. As land only needs to meet one of the criteria to be fit for MOL designation, the highest scoring criteria provides the overall score. Each opportunity area is thereby given a score as to how closely it aligns with our open space ambitions.

149. These criteria align with the London Plan MOL criteria and will be used for our Open Spaces Appraisal. The first **Criterion A**: 'Contributes to the physical structure of London by being clearly distinguishable from the built-up area. The strongest criterion would include':

- Built development is completely absent. And/or:
- The parcel provides a very clear and highly defined sense of openness and separation, such that openness is the defining/dominant characteristic of the parcel.
And/or:
- Contains very strong and varied landscape structure (intimate spatial scale and landscape mosaic) and/or topographic variation, which define edge conditions – a hard, well-defined boundary.

150. Open Spaces Appraisal **Criterion B**: 'Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London'. Parcels with the strongest adherence to the criteria would include:

- A strategic Green infrastructure site of London-wide importance. And/or:
- Parcel contains 'destination' open air sports, recreational or cultural facilities of London-wide importance, which may also serve a catchment beyond London.

151. Open Spaces Appraisal **Criteria C:** 'Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value' such as:

- Parcel forms a key location in a World Heritage Site or is a key part of a Registered Park and Garden/contains many key features listed in the citation/contains a Registered Park and Garden in its entirety. And/or:
- Parcel forms an essential part of a Regional Park or other green space of Metropolitan importance. And/or:
- Parcel is ecologically outstandingly rich, possessing either internationally important habitats or is designated for ecology at such a level

152. Open Spaces Appraisal **Criteria D:** 'Forms part of a Green Chain or link in the green infrastructure network and meets one of the above criteria' such as:

- Parcel contains or forms part of a park of Metropolitan importance or contains part of a green link of London-wide importance, such as a Green Chain. Likely also to contain an extensive or well-connected green link network.

153. The assessment against these criteria will be addressed through the area visions and site allocations referencing each individual open space, and how effectively the area visions align with desired targets for the open space as represented in the appraisal criteria. First there will be a summary addressing the desired regeneration targets for open space in the area based on the published area action plans and area visions. Secondly, a table will provide under each opportunity area which provides name and quantity of open space in that area. This finally informs the points-based assessment in the appraisal methodology, to evaluate the effectiveness of the New Southwark Plan policy, site allocations and area visions, as well as supplementary documents, to achieve our overall ambition to improve, increase and maintain open space in the borough.

4.4 Analysis

154. The following section will provide a review of these criterion against each of the proposed Area Action Plan's in the borough.

Elephant and Castle SPD

155. The redevelopment of the Heygate Estate will include the provision of a brand new park. That is Elephant Park extending to at least 0.8 hectares (2 acres). The Council has approved £6million to enhance open spaces at Pullens Gardens, Victory Square, Dickens Square, Nursery Row Park, Newington Gardens and St Mary's Churchyard (first phase of which has been completed).

156. In addition to providing the new park, 1,200 new trees within a kilometre of the former Heygate Estate are being planted.

157. The sub-area has a total of 0.7ha of park provision per 1,000 populations, which is below the standard of 0.72ha per 1,000 populations. This is expected to fall to 0.56ha per 1,000 populations in 2026 as a result of population growth.

158. The area is also highly deficient in the amount of natural greenspace available, with just 0.38ha per 1,000 population (which will fall to 0.31ha per 1,000 population in 2026) compared to a standard of 1.5ha per 1,000 population.

159. The sub-area has the highest population density of any sub-area in the borough. Furthermore, the area has the second highest proportion of housing units with no access to private open space (after Bankside). Both of these indicators suggest high demand for open space within the sub-area. Satisfaction with open space was the lowest of any sub-area in the borough. However, opinions on quality were relatively good, which suggests that the lack of satisfaction is largely a result of the lack of quantity or range of open space. Residents of Elephant and Castle were also more likely to suggest that safety fears prevent the use of open spaces.

Table 7: Existing development in the Elephant & Castle over 1.0 ha

| Name of Space | Typology | Size (ha) |
|----------------------------------|-------------------|-----------|
| Newington gardens | Small local park | 1.20 |
| Nursery Row Park | Small Local Park | 1.45 |
| Geraldine Mary Hamsworth Park | Local Park | 5.94 |
| David Copperfield | Linear open space | 0.22 |

| | | |
|--------|--|--|
| Garden | | |
|--------|--|--|

160. Open space sites smaller than 1.00 ha
- St Mary’s Churchyard Newington (0.63)
 - Victory Community park (0.51)
 - West Square Garden (0.36ha)
 - Falmouth Road Community Garden (0.19)
 - Lamlash street (0.15 ha)

| Criterion A: ‘Contributes to the physical structure of London by being clearly distinguishable from the built-up area’ | | | | | |
|---|--|---|-----------------|------------------------|---|
| Criterion B: ‘Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London’: | | | | | |
| Criteria C: ‘Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value’ | | | | | |
| Criteria D: ‘Forms part of a Green Chain or link in the green infrastructure network and meets one of the above criteria’ | | | | | |
| | | | | | |
| Opportunity Area | Weak | Weak-moderate | Moderate | Moderate-strong | Strong |
| Elephant and Castle | Criterion B No parks at present that significantly contribute to London (MOL designated land) | Criterion A Some topography change and sense of openness in parks, however built development is most often notable | | | Criterion D The development of a new park is extremely important in its formation as part of Green Chain links between Walworth and Elephant Park. |

| | | | | | |
|---------------------------------|--------------|--|--|--|---|
| | | | | | Walking tours of the area have been undertaken to emphasize this value. |
| | | Criterion C Ecological value is moderately limited | | | |
| Total points (out of 25) | 10/25 40% | | | | |

Table 8: Open Spaces Appraisal in the Elephant & Castle over 1.0 ha

Canada Water AAP

161. The sub-area has the second highest amount of open space per person in the borough with 1.53ha per 1,000 populations, and therefore is above the standard of 0.72ha per 1,000 populations. The sub-area also has a high amount of natural greenspace, with 4.44ha per 1,000 population, which will fall to 3.55ha per 1,000 population in 2026 as a result of population growth, and which is well above the standard of 1.51ha per 1,000 population.

162. The quality and value of open space in Canada Water and Rotherhithe is generally good. However, Figure 9.4 shows that the following sites have potential for improvement:

- Improve the quality of landscaping and security at Deal Porters Walk (OS34).
- Bring Surrey Docks Sports Ground (OS6) back into use.
- Improve the quality of open space at St Pauls Sports Ground (CW1).
- Introduce new open space uses at the Former Nursery (CW2).
- Provide improvements to the athletics track and ancillary buildings at Southwark Park (OS53).
- Investigate the potential to introduce new habitat creation at Kings Stairs Gardens (OS28).
- Improve the range of facilities at Durands Wharf (OS40)

163. Canada Water and Rotherhithe have a good range of open spaces, some of which are already well linked together by green routes. However, there is potential to improve links including:

- Links between Southwark Park, Greenland Dock and Russia Dock Woodland through the new development opportunities within the town centre area.
- Potential to improve links from the Thames Path into Russia Dock Woodland.

Table 9: Existing development in the Canada Water over 1.0 ha

| Name of Space | Typology | Size (ha) |
|--|--|-----------|
| King's Stairs Gardens | Small local park | 3.46 |
| Albion Channel | Civic space | 1.16 |
| Stave Hill | Ecological Park Natural or semi-natural greenspaces | 2.23 |
| Russia Dock Woodlands | District Park | 10.80 |
| St Pauls Sports Ground | Outdoor Sports Facilities - education | 1.78 |
| Southwark Park | Metropolitan Park | 26.57 |
| Canada Water | Natural or semi-natural greenspaces | 2.36 |
| Surrey Docks Sports Ground (Pitches 2&3) | Outdoor Sports Facilities - education | 2.45 |

164. Open space sites smaller than 1.00 ha

- Hope Sufferance Wharf Civic Spaces 0.01
- St Mary's Churchyard, Cemeteries 0.27
- St Mary's Churchyard Gardens Pocket Park 0.37
- Knot Garden Civic Spaces 0.06
- Brunel Pump House Civic Spaces 0.12
- Deal Porter's Walk Linear Open Space 0.58
- Stave Hill Small Local Park 0.69

- Holy Trinity Churchyard Cemeteries 0.61
- Durand’s Wharf Small Local Park 0.97
- Surrey Docks Farm Other 0.89
- Former Nursery Canada Water and Rotherhithe Natural or semi-natural greenspaces 0.34
- Cumberland Wharf Canada Water and Rotherhithe Pocket Park 0.04
- Surrey Docks Adventure Playground Canada Water and Rotherhithe Provision for young people and teenagers 0.41
- Neptune Street Park Canada Water and Rotherhithe Pocket Park 0.10
- King George’s Field Park Canada Water and Rotherhithe Small Local Park 0.66
- Surrey Docks Sports Ground (Pitch 1) Canada Water and Rotherhithe Outdoor Sports Facilities - private 0.91

| | | | | | |
|---|--|--|--|--|---|
| Criterion A: ‘Contributes to the physical structure of London by being clearly distinguishable from the built-up area’ | | | | | |
| Criterion B: ‘Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London’: | | | | | |
| Criteria C: ‘Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value’ | | | | | |
| Criteria D: ‘Forms part of a Green Chain or link in the green infrastructure network and meets one of the above criteria’ | | | | | |
| Canada | | | | | Criterion A |
| Water | | | | | Built development is completely absent, open spaces is highly defined and frequent. |
| | | | | | Criterion B: London-wide value |
| | | | | | Criterion C: Ecologically |

| | | | | | |
|---------------------------------|---------------|--|--|--|--|
| | | | | | rich due to diverse nature of habitats |
| | | | | | Criterion D: MOL importance in area. |
| Total points (out of 25) | 25/25 100% | | | | |

Table 10: Open Spaces Appraisal in the Canada Water over 1.0 ha.

Aylesbury AAP

165. In total, the sub-area has a total of 2.33ha of park provision per 1,000 population, which is well above the standard of 0.72ha per 1,000 population. This is expected to fall to 2.1ha per 1,000 population in 2026 as a result of population growth. The area also meets the Borough's natural greenspace standards with 2.24ha per 1,000 population (which will fall to 2.01ha per 1,000 population in 2026) compared to a standard of 1.51ha per 1,000 population.

166. The Aylesbury and Walworth sub-area has some of the overall highest levels of need for open space as a result of the high rates of poor health, high levels of deprivation, high population densities and high child densities. The residents' survey identified that residents of the sub-area were more likely to rate the quality of open space as poor than in other areas of the borough.

167. Spaces which are in particular need of investment are:

- Aylesbury Allotments (401);
- Fielding St Allotments (409);
- Forsyth Gardens (OS90);
- Surrey Square Park (OS77); and
- Burgess Park (OS91).

168. Potential Improvements to Linkages between Spaces 9.58 There is potential to improve links between Burgess Park, which is well located in the centre of the borough,

to other major open spaces including Southwark Park, Kennington Park and the smaller open spaces in Peckham and Camberwell. The 'green fingers' proposed as part of the Aylesbury AAP linking the new development with Burgess Park will also help to connect the proposals with this important open space.

Table 11: Existing development in the Aylesbury & Walworth over 1.0 ha

| Name of Space | Typology | Size (ha) |
|--------------------|------------------|-----------|
| Surrey Square Park | Small local park | 1.39 |
| Burgess Park | District Park | 47.62 |
| Surrey Gardens | Small local park | 1.56 |
| Faraday Gardens | Small local park | 1.23 |

169. Open space sites smaller than 1.00 ha

- Aylesbury Road 0.10
- Fielding Street 0.16
- Walworth Garden Farm 0.17
- Forsyth Gardens Aylesbury & Walworth Small Local Park 0.45
- Sutherland Square Aylesbury & Walworth Pocket Park 0.04
- Pelier Park Aylesbury & Walworth Pocket Park 0.28
- St Peter's Churchyard Aylesbury & Walworth Cemeteries 0.36

| | | | | | |
|---|--|--|------------------------------|--|-----------------------------|
| Criterion A: 'Contributes to the physical structure of London by being clearly distinguishable from the built-up area' | | | | | |
| Criterion B: 'Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London': | | | | | |
| Criteria C: 'Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value' | | | | | |
| Criteria D: 'Forms part of a Green Chain or link in the green infrastructure network and meets one of the above criteria' | | | | | |
| Aylesbury | | | Criterion C: Ecologically | | Criterion A Burgess Park |

| | | | | | |
|---------------------------------|--------------|--|---|--|---|
| | | | rich due to diverse nature of habitats is moderate in Burgess Park. | | is particularly distinguishable. |
| | | | | | Criterion B: Burgess Park provides considerable value provided beyond the local area. |
| | | | | | Criterion D: Burgess Park is an example of a successful green link. |
| Total points (out of 25) | 18/25 72% | | | | |

Table 12: Open Spaces Appraisal in the Aylesbury & Walworth over 1.0 ha.

Peckham and Nunhead AAP

170. In total, the sub-area has a total of 1.1ha of park provision per 1,000 population, which is above the standard of 0.72ha per 1,000 population. This is expected to fall to 0.96ha per 1,000 population in 2026 as a result of population growth. The area also meets the borough's natural greenspace standards with 1.92ha per 1,000 population (which will fall to 1.67ha per 1,000 population in 2026) compared to a standard of 1.51ha per 1,000 population.

171. The AAP sets a target of 2000 new homes to 2026, the majority of which will be located in the Peckham core action area. GLA population estimates project that the

population will increase by 14.8% to 67,754. The variety of development sites also present opportunities to increase the provision of open space.

172. Access to parks and natural greenspaces is relatively good throughout the sub-area. The south of the sub-area has a greater amount of park provision per person, although Burgess Park provides opportunities to access larger open spaces for residents in the northern part of Peckham. There is a need to increase the provision of public parks and natural greenspace wherever possible within the north of the sub-area.

173. Proposals to address these deficiencies are:

- Reintegrate the northern section of Cossall Park (formerly part of Tuke's school) to the existing protected open space.
- Improve links to Burgess Park and Peckham Rye Park & Peckham Rye Common.
- Investigate the potential to improve the quality and range of provision at the amenity space at Meeting House Lane.

174. Spaces in Peckham generally scored lower in terms of quality than other spaces in the borough. The following spaces should be prioritised for improvements as outlined in the Open Spaces Strategy (2013):

- Goldsmith Road Nature Garden (OS103);
- One Tree Hill (OS150);
- Brayards Green (PN5); and
- Kirkwood Road Nature Garden (PN7).

175. Peckham has the most significant linear greenspace in the form of the Surrey Canal Walk linking Burgess Park with Peckham town centre. There is potential to extend this link southwards through the town centre to connect with Peckham Rye Park and Peckham Rye Common. There is also potential to improve connections to the spaces in the east of the sub-area and to link in with Nunhead Cemetery and the existing Green Chain Network.

Table 13: Existing development in the Peckham & Nunhead over 1.0 ha

| Name of Space | | Typology | Size (ha) |
|---------------|---------|------------------|-----------|
| Nunhead | Railway | Natural or semi- | 4.97 |

| | | |
|--|---------------------------------------|-------|
| Embankments | natural greenspaces | |
| Cossall Park | Local park | 1.12 |
| Peckham Rye Park and Common and Piermont Green Metropolitan Park | Metropolitan Park | 42.75 |
| Nunhead Allotments | Allotments | 3.46 |
| Honor Oak Sports Ground | Local Park | 5.06 |
| Honor Oak Allotments | Allotments | 2.21 |
| One Tree Hill | Natural or semi-natural greenspaces | 6.95 |
| Brenchley Gardens | Small Local Park | 3.17 |
| Aquarius Golf Course | Outdoor Sports Facilities - private | 13.31 |
| Waverley School | Outdoor Sports Facilities - education | 1.46 |
| Camberwell New Cemetery and | Grounds Cemeteries | 17.72 |
| Iydale Road Playing Field | Outdoor Sports Facilities - education | 6.20 |
| Nunhead Cemetery | Cemeteries | 20.37 |
| Nunhead Reservoir | Other | 3.87 |

176. Open space sites smaller than 1.00 ha

- Sumner Park Pocket Park 0.37
- Goldsmith Road Nature Garden Natural or semi-natural greenspaces 0.09
- Bellenden Road Tree Nursery Allotments 0.07
- St Mary Frobisher Gardens Pocket Park 0.14

- McDermott Grove Nature Allotments 0.13
- Consort Park Pocket Park 0.34
- Dr Harold Moody Park Small Local Park 0.51
- Nunhead Green Pocket Park 0.28
- Goose Green Playground Small Local Park 0.40
- Water Works Other 0.25
- Central Venture Park Provision for young people and teenagers 0.45
- 377 Calypso Gardens Pocket Park 0.23
- Grove Park Allotments ad Allotments 0.25
- Jowett Street Park Small Local Park 0.84
- Lyndhurst Square Amenity space 0.03
- Hatcham Gardens Pocket Park 0.11
- Brayards Green Amenity space 0.71
- Buchan Hall Sports Pitch Outdoor Sports Facilities - private 0.06
- Kirkwood Road Nature Garden Small Local Park 0.25

| | | | | | |
|---|--|--|--|--|---|
| Criterion A: 'Contributes to the physical structure of London by being clearly distinguishable from the built-up area' | | | | | |
| Criterion B: 'Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London': | | | | | |
| Criteria C: 'Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value' | | | | | |
| Criteria D: 'Forms part of a Green Chain or link in the green infrastructure network and meets one of the above criteria' | | | | | |
| | | | | | |
| Peckham and Nunhead | | | | | Criterion A Peckham Rye Park and other adjoining parks are particularly distinguishable from surrounding built form. |

| | | | | | |
|---------------------------------|---------------|--|--|--|---|
| | | | | | Criterion B: The number of parks in Peckham provides considerable value provided beyond the local area. |
| | | | | | Criterion C: Ecologically rich due to diverse nature of habitats |
| | | | | | Criterion D: Peckham Park and Surrey Canal Walk link Burgess Park with Peckham town centre successfully. |
| Total points (out of 25) | 25/25 100% | | | | |

Table 14: Open Spaces Appraisal in the Peckham & Nunhead over 1.0 ha

Old Kent Road AAP

177. The long term plan for the Old Kent Road is ultimately to deliver up to 20,000 homes for the area. This would require a net additional open space provision of **10 Ha**. (Burgess Park is approximately 46 Ha).

178. The draft Old Kent Road Opportunity AAP currently allocates a total of 16,356 homes within its master plan areas (e.g. OKR1, OKR2, etc). This requires a new open space provision of **8.18 Ha**. The current proposed provision at January 2019 is **8.3Ha**. Future development potential that was omitted to the draft AAP in 2017 but may influence figures in future AAP drafts include:

- Bricklayers Arms masterplan, which was under dispute with TfL over land ownership (subject to a station decision)
- Tustin and Ledbury estates rebuilding / infill (subject to residents preferences)
- Longer term redevelopment of the Integrated Waste Management Facility (IWMF)
- Redevelopment of Small Sites (not subject of masterplans)
- The provision of 10 HA. Additional hectars is therefore a possibility. The Area Action Plan proposes three large new parks:
 - Mandela Way / Frensham Street Depot
 - Old Gasworks
 - Linear Park along the route of the Surrey Canal
- These are alongside a network of new smaller parks, green links and public spaces to benefit existing and new residents.
- All three of these parks have been enlarged from the draft AAP

179. As well as working strategically, we have commissioned Patel Taylor architects to prepare a detailed design guidelines document for the Old Kent Road Linear Park which will act as an overarching future design guide for the park, as each parcel of development is put forward. We will be engaging with local communities in the early draft of this strategy to ensure that they have a sense of ownership of the approach.

Table 15: Proposed open space provision in the Old Kent Road.

| Total units currently proposed in the OKR AAP | Total open space required (5m ² per unit) | Total open space proposed |
|---|--|--------------------------------|
| 16,356 units | 81,780m ² (8.18 Ha) | 84,100m ² (8.41 Ha) |

180. In terms of population and provision, the indicative Old Kent Road opportunity area population of 64,441(2036), consisting of 29,441 created by the regeneration (16,356 units x 1.8 people) and an existing population of 35,000, would benefit from a total open space provision of 8.41 Ha at 0.31 Ha of open space per 1,000 population. The 0.31 Ha

per 1000 population of open space is double the predicted local deficit of 0.13 Ha outlined in the Open Space Strategy.

Table 16: Projected population changes on the Old Kent Road.

| Indicative existing OKR population | Indicative new OKR population | Total population of opportunity area (2036) | LBS open space strategy provision <i>without</i> regeneration (2026) | Proposed open space provision <i>with</i> regeneration (2036) |
|------------------------------------|-------------------------------|---|--|---|
| 35,000 | 29,441 | 64,441 | 0.13ha per 1,000 population | 0.31 Ha of open space per 1,000 population |

181. The 8.41 Ha network of new spaces and links would offer more choice and opportunity where there is currently a clear deficiency. This improved open space provision alongside full workspace reprovision and infrastructure including schools, roads and public realm would not be possible without the opportunity area designation. If no development took place, the open space provision would decrease to 0.13 Ha due to the lack of new open spaces being delivered. The 8.41 Ha of total open space does not include 46 Ha of Burgess Park which is a significant resource abutting the opportunity area that has recent seen significant investment to improve its quality. The Open Space Strategy included Burgess Park within the Aylesbury sub area which created an over provision of park space for this sub area, although the Old Kent Road opportunity area population can easily access and use Burgess Park and Southwark Park. All existing housing amenity land is also not included in the open space calculation.

Table 17: Existing development in the Old Kent Road over 1.0 ha (considered in MOL Open Space Review)

| Name of Space | Typology | Size (ha) |
|--------------------------------------|-------------------------------------|-----------|
| South Bermondsey Railway Embankments | Natural or semi-natural greenspaces | 2.29 |

Table 18: Currently in pipeline open space development (Not considered in MOL Open Space Review)

| Name of Space | Density | % open space | No units | Size (ha) |
|---------------|---------|--------------|----------|-----------|
|---------------|---------|--------------|----------|-----------|

| | | | | |
|---------------|-----------------------------|--------------------------|------|------|
| Ruby Triangle | 2,713 HRH in officer report | 45.59% (approx. 0.62 ha) | 1152 | 1.36 |
| Malt Street | 2,687 HRH | 62% (approx. 1.19 ha) | 1300 | 1.9 |
| Cantium | 2,147 HRH | 41.76% (approx. 0.71 ha) | 1113 | 1.7 |

182. Open space sites smaller than 1.00 ha

- Alscot Road Allotments Allotments 0.09
- Evelina Lowe Nature Garden Pocket Park 0.19
- Bramcote Play Area Provision for young people and teenagers 0.18
- Varcoe Road Nature Garden Pocket Park 0.19
- Paterson Park (Western part) Small Local Park 0.52
- The Stables Other 0.33
- Paragon Gardens Pocket Park 0.59
- Salisbury Row Park Small Local Park 1.14
- St Anne's Churchyard Cemeteries 0.19
- St James' Road Allotments Allotments 0.28
- Shuttleworth Park Pocket Park 0.27
- Galleywell Road Nature Garden Natural or semi-natural greenspaces 0.08
- Swanmead Small Local Park 0.46
- Bermondsey Spa Park Small Local Park 1.59
- Lucey Way/Alexis Street Small Local Park 1.05
- Aspinden Road Nature Garden Natural or semi-natural greenspaces 0.04
- Beormond Environs Open Space. Small Local Park 0.11
- St James' Churchyard Small Local Park 0.76
- Bermondsey Square Amenity space 0.02
- Trinity Church Square Cemeteries 0.10
- Dickens Square Small Local Park 1.20
- Merrick Square Pocket Park 0.14
- Tabard Gardens Local Park 1.75
- Hankey Place Gardens Pocket Park 0.08

- Long Lane Park Pocket Park 0.14
- St John's Churchyard Bankside, Borough and London Bridge Cemeteries 0.95
- Dr Salter's Playground Provision for young people and teenagers 0.22
- Cherry Gardens Linear Open Space 0.31
- Angel Public House Civic Spaces 0.06
- King Edward III Manor House Other 0.31

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|---|--------------|---|--|--|--|--|
| Criterion A: 'Contributes to the physical structure of London by being clearly distinguishable from the built-up area' | | | | | | |
| Criterion B: 'Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London': | | | | | | |
| Criteria C: 'Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value' | | | | | | |
| Criteria D: 'Forms part of a Green Chain or link in the green infrastructure network and meets one of the above criteria' | | | | | | |
| | | | | | | |
| Old Kent Road | Criterion A: | Existing open space is not strongly distinguished from its surrounding urban condition. | | | | |
| | Criterion B: | Open space in this area does not provide significant level of leisure, recreation or cultural | | | | |

| | | | | | |
|---------------------------------|--|--|--|--|--|
| | activities. | | | | |
| | Criterion C: Existing parks are not recognised for Metropolitan level importance. | | | | |
| | | | | Criterion D: Existing parks do not feed in sufficiently to green links; however a proposed linear park suggests this will be the case following regeneration. | |
| Total points (out of 25) | 7/25 28% | | | | |

Table 19: Open Spaces Appraisal of existing development in the Old Kent Road over 1.0 ha
Bankside, Borough and London Bridge

183. The sub-area has a total of 0.25ha of park provision per 1,000 population, which is well below the standard of 0.72ha per 1,000 population. This is expected to fall to 0.20ha per 1,000 population in 2026 as a result of population growth. The area is also deficient in the amount of natural greenspace available, with just 1.22ha per 1,000 population

(which will fall to 0.97ha per 1,000 population in 2026) compared to a standard of 1.51ha per 1,000 population.

184. The majority of open spaces in the sub-area are of good quality and are valued by the local community. Spaces which are below the borough average for quality and value, and should be the focus of improvements, includes:

- Christchurch Gardens (OS1). Potential to improve landscaping and facilities to address park deficiency in this area.
- Marlborough Playground (OS17). Potential to improve landscaping and access.
- Leathermarket Gardens (OS20). Potential improvements to biodiversity.

185. Potential Improvements to linkages between spaces

- The Thames Path is a key route through the sub-area. The Thames itself is perhaps Bankside's most important open space and helps to define the character of the sub-area;
- There is potential to provide links from other parts of the sub-area to link into the Thames Path;
- There is potential to improve links between the clusters of open spaces around Redcross Way. Many of these spaces are hidden from view and could be linked together by more effective signage and tree planting;
- There is also potential to link to other parts of the borough, including Elephant and Castle and Bermondsey, as well as Burgess Park and Southwark Park, in order to address the deficiency in access to larger open spaces.

| | | | | | |
|---|--------------------------|--------------------------|-------------------|---------------------------|--|
| Criterion A: 'Contributes to the physical structure of London by being clearly distinguishable from the built-up area' | | | | | |
| Criterion B: 'Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London': | | | | | |
| Criteria C: 'Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value' | | | | | |
| Criteria D: 'Forms part of a Green Chain or link in the green infrastructure network and meets one of the above criteria' | | | | | |
| | | | | | |
| Bankside / Borough | Criterion D: Green links | Criterion A: Green links | Criterion B: Open | Criterion C: considerable | |

| | | | | | |
|---------------------------------|---|--|--|---|--|
| London Bridge | are relatively non-existent however other forms of important links exist. | are not strongly distinguished from surrounding area but attempts are made to do so in the form of street furniture. | spaces are used for leisure activity moderately. | heritage importance of these parks attributed to the Thames Path. | |
| Total points (out of 25) | 10/25 40% | | | | |

Table 20: Open Spaces Appraisal of existing development in the Bankside, Borough and London Bridge over 1.0 ha

Camberwell

186. The sub-area has a total of 0.27ha of park provision per 1,000 population, which is below the standard of 0.72ha per 1,000 population. This is expected to fall to 0.23ha per 1,000 population in 2026 as a result of population growth. The area is also deficient in the amount of natural greenspace available, with 0.47ha per 1,000 population (which will fall to 0.42ha per 1,000 population in 2026) compared to a standard of 1.51ha per 1,000 population.

187. Camberwell has a number of spaces that are not fulfilling their current potential, many of which are located in the south of the sub-area closer to Dulwich. Figure 9.6 shows all spaces which are below the borough average for quality and value. Quality improvements are particularly required to:

- Nairn Grove Nature Garden (OS134);
- Greendale Playing Field (OS128);
- Benhill Road Nature Garden (OS97); and
- Greendale Artificial Pitch (OS129).

188. There is potential to improve links between Burgess Park and the smaller parks and open spaces within Camberwell. There is also potential to create routes linking Greendale and Dulwich with other parts of the sub-area and extending links to Dulwich.

| | | | | | |
|---|--------------|---|---|--|--|
| Criterion A: 'Contributes to the physical structure of London by being clearly distinguishable from the built-up area' | | | | | |
| Criterion B: 'Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London': | | | | | |
| Criteria C: 'Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value' | | | | | |
| Criteria D: 'Forms part of a Green Chain or link in the green infrastructure network and meets one of the above criteria' | | | | | |
| | | | | | |
| Camberwell | | Criterion D: Green links are relatively non-existent however some exist. | Criterion B: Open spaces are used for leisure activity moderately. | Criterion A: Green links are strongly distinguished from surrounding area but attempts are made to do so in the form of street furniture. | |
| | | | | Criterion C: considerable heritage importance of these parks attributed to the Thames Path. | |
| Total points (out | 13/25 52% | | | | |

Table 21: Open Spaces Appraisal of existing development in Camberwell over 1.0 ha

Dulwich

189. In total, the sub-area has a total of 0.91ha of park provision per 1,000 population, which is above the standard of 0.76ha per 1,000 population. This is expected to fall to 0.76ha per 1,000 population in 2026 as a result of population growth. The area also meets the borough’s natural greenspace standards with 4.1ha per 1,000 population (which will fall to 3.73ha per 1,000 population in 2026) compared to a standard of 1.51ha per 1,000 population.

190. Figure 9.8 shows all spaces which are below the borough average for quality and value. The following sites have potential to be improved in terms of quality:

- St Peter’s Church Yard (OS170)
- Dawson Heights (OS155)
- Herne Hill Cycle Stadium (OS146)
- Long Meadow (OS184).

Criterion A: ‘Contributes to the physical structure of London by being clearly distinguishable from the built-up area’

Criterion B: ‘Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London’:

Criteria C: ‘Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value’

Criteria D: ‘Forms part of a Green Chain or link in the green infrastructure network and meets one of the above criteria’

| | | | | | |
|--|--|--|--|--|--|
| | | | | Criterion C: Some existing parks are recognised for | Criterion A: Existing open space is strongly distinguished from its |
|--|--|--|--|--|--|

| | | | | | |
|---------------------------------|--------------|--|--|--------------------------------|--|
| | | | | Metropolitan level importance. | surrounding urban condition. |
| | | | | | Criterion B: Open space provide significant level of leisure, recreation or cultural activities. |
| | | | | | Criterion D: Existing parks feed completely into green links. |
| Total points (out of 25) | 19/25 76% | | | | |

Table 22: Open Spaces Appraisal of existing development in the Dulwich over 1.0 ha.

4.5 Data Source

191. The appraisal is undertaken using professional judgment, supported by the baseline information in section 3 of this paper and wider evidence base.

4.6 Limitations of Appraisal

192. Benefits from open spaces spill over into neighbouring boundaries. Future population projections and future proposed or approved open spaces have not been considered.

4.7 Conclusion of Appraisal

193. The assessment methodology for MOL designation provides details to allow an evaluation to take place of the effectiveness of the New Southwark Plan policy, site

allocations and area visions, as well as supplementary documents, to achieving an overall improvement and maintenance in open space.

Areas within the borough can be rated against this assessment in the following order:

| Opportunity Area | Appraisal Rating (%) |
|-------------------------------------|----------------------|
| Elephant and Castle | 40 |
| Canada Water | 100 |
| Aylesbury | 72 |
| Peckham and Nunhead | 100 |
| Old Kent Road | 28 |
| Bankside, Borough and London Bridge | 40 |
| Camberwell | 52 |
| Dulwich | 76 |

Table 23: MOL Open Spaces Designation Assessment Methodology rating for each opportunity area in the borough

194. The appraisal indicates the opportunity areas in the borough which most effectively comply with the Open Spaces appraisal criterion set out for optimum open space provision. It is based on data of the quality of open space as currently being provided, rather than forecasting based on future, approved or proposed open spaces. In conclusion, it indicates the areas with the poorest provision of open space for both quality and quantity as Elephant and Castle and the Old Kent Road. These are areas that are planning to undergo a large quantity of regeneration in coming years, and a statement into the update of open space has been provided in this paper. Overall, the current indicative appraisal for open space will be improved based on the proposed and approved open spaces both in Elephant and Castle and on the Old Kent Road. This suggests that current area visions and supplementary planning documents are in line with national and regional policy.

5. Concluding Summary of Borough Infrastructure

195. The Open Spaces background paper shows that policy within the New Southwark Plan is effective in promoting the protection, improvement and maintenance of open spaces within the borough. It recognises the importance of open spaces for heritage, biodiversity, air quality, health, transport, wellbeing and amenity values. It highlights the importance of open space in providing a successful development plan and improving built form. This paper also shows that the adoption of policy which promotes the proactive planning of strategic open spaces will have positive impacts in being able to identify areas of deficiency in open space and secure increased coordination with developers in regeneration areas to improve and enhance open spaces. This ensures continued conformity with regional and national policy.

196. The Council has paid careful consideration to national and regional policy during the production of the New Southwark Plan. In this paper each policy is justified against the NPPF and London Plan guidance. Section 4 provides an appraisal of all opportunity areas in the borough for ease of reference, and to identify deficiencies in order to monitor any potential shortcomings in current open spaces provision in line with future projected population growth. The limitation of the appraisal is that it does not take into consideration future or proposed open spaces or future population projections, thereby providing only a retrospective value into the meeting of each opportunity area with the Open Spaces appraisal.

6. References

National

- Department for Communities and Local Government (2012), National Planning Policy Framework (NPPF) (Revised in 2019)
- Department for Communities and Local Government (2019), Planning Practice Guidance: Natural Environment
- Commission for Architecture and the Built Environment and the Greater London Authority (2009), Open Space Strategies, Best Practice Guidance
- Department for Communities and Local Government (2014), Planning Practice Guidance: Open space, sports and recreation facilities, public rights of way and local green space
- DEFRA (2019), Environment Bill 2019
- DEFRA (2010), English national parks and the broads: UK government vision and circular 2010
- Planning Inspectorate (2019), Report to the Mayor of London: Report of the Examination in Public of the London Plan 2019

Regional Level

- Greater London Authority (2016), London Plan, Consolidated with Alterations Since 2011
- Greater London Authority (2019), Draft London Plan – Consolidate Changes Version
- Greater London Authority (2018), London Environment Strategy
- Greater London Authority (2002), Biodiversity Strategy. (Revised in 2015)

Local Authority Level

- LB Southwark (2013), Biodiversity Action Plan
- LB Southwark (2011), Canada Water AAP SINC's background paper
- LB Southwark (2019), Draft Biodiversity Action Plan 2020
- LB Southwark (2010), Core strategy SINC background paper
- LB Southwark (2011), Energy and Carbon Reduction Strategy
- LB Southwark (2017), Infrastructure Plan
- LB Southwark (2011), Local Plan, Core Strategy

- LB Southwark (2019), Movement Plan
- LB Southwark (2019), Old Kent Road AAP Proposed Submission Version
- LB Southwark (2013), Open Space Strategy
- LB Southwark (2007), Plan Saved Policies
- LB Southwark (2013), Peckham and Nunhead AAP open spaces background paper
- LB Southwark (2013), Peckham and Nunhead AAP SINC's background paper
- LB Southwark (2016), SINC Review and Borough Ecological Survey
- LB Southwark (2007), Section 106 Planning Obligations SPD

Glossary

| | |
|------------------------------|---|
| AAP | Area Action Plan |
| BAP Biodiversity Action Plan | A BAP describes biological resources in an area and provides detailed plans for conservation of these resources. |
| Blue Ribbon Network | A spatial policy covering London's waterways and water spaces and land alongside them. It includes the Thames, the canal network, the other tributaries, rivers and streams within London and London's open water spaces such as docks, reservoirs and lakes. |
| BOL | Borough Open Land |
| DfT | Department for Transport |
| DIP | Delivery and Implementation Plan |
| EIP | Examination in Public: The process by which an planning inspector publicly examines a Development Plan Document. |
| GLA | Greater London Authority |
| Green Chain | Areas of linked but separate open spaces and the footpaths between them. They are accessible to the public and provide way-marked paths and other pedestrian and cycle routes. |
| Green infrastructure (GI) | The multifunctional, interdependent network of open and green spaces and green features (e.g. green roofs). It includes the Blue Ribbon Network but excludes the hard-surfaced public realm. This network lies within the urban environment and the urban fringe, connecting to the surrounding countryside. It provides multiple benefits for people and wildlife including: flood management; urban cooling; improving physical and mental health; green transport links (walking and cycling routes); ecological connectivity; and food growing. Green and open spaces of all sizes can be part of green infrastructure provided they contribute to the functioning of the network as a whole. |
| LBS | London Borough of Southwark |
| LNR | Local Nature Reserve |

| | |
|-------------|---|
| MOL | Metropolitan Open Land |
| NATURA 2000 | The network of nature protection areas within the European Union, made up of Special Areas of Conservation and Special Protection Areas |
| NNR | National Nature Reserve |
| NPPF | National Planning Policy Framework |
| OKR | Old Kent Road |
| OOS | Other Open Space, areas of open space in the borough which have high local significance |
| PROW | Public Right of Way |
| PPG | Planning Practice Guidance |
| RAMSAR | Ramsar are wetland of international importance that have been designated under the criteria of the Ramsar Convention on Wetlands |
| SAC | Special Area of Conservation, listed in the EU Habitats Directive |
| SINC | Site of Importance for Nature Conservation SINCs are sites which are recognised as being of particular importance to wildlife and biodiversity are divided into Sites of Borough Importance for Nature Conservation (Grade I and Grade II) and Site of Local Importance for Nature Conservation. |
| SMI | Sites of Metropolitan Importance for Nature Conservation |
| SNCI | Site of Nature Conservation Interest |
| SSSI | Special Site of Scientific Interest due to their fauna, flora, geological or conservation value at a local level. |
| UDF | Unitary Development Framework |
| UDP | Urban Development Plan, refers to Southwark Plan adopted (2007) |