

LI London comments on the draft New London Plan

1st March 2018

The LI is the chartered body for the landscape profession. It is a professional organisation and educational charity working to protect, conserve and enhance the natural and built environment for the public benefit.

Landscape Institute London (LI London) is the branch of The Landscape Institute (LI) that covers the Greater London area. The branch represents the LI on consultation responses to policy issues relating to the London area.

CHAPTER 8 – GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT

LI London broadly supports the policies set out in the Draft London Plan, but are concerned that stronger measures are required to protect the environment to resist pressures on London's open spaces.

In February 2018 the Mayor announced the first National Park City Week (21st-29th July 2018)¹, however there is nothing in the London Plan about opportunities associated with the new National Park City or how it will impact policy.

Policy G1 Green Infrastructure

A – LI London suggests adding the word 'extended'. The sentence should read 'London's network of green and open spaces' ... 'should be extended, protected, planned, designed and managed ...' Otherwise, the percentage of open space is unlikely grow from 47 to 50% as envisioned.

Policy G2 London's Green Belt

A – LI London considers that there needs to be a better definition of 'inappropriate' in order to protect the Green Belt from such development. It is recognised that the NPPF, Section 9, Clause 81 states that local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. However, many sport pitches are now artificial turf, which could be considered not very sustainable, whilst there is no direct mention of green recreation e.g. country parks, wildlife reserves, fishing lakes, etc.

LI London has concerns about some development itemised in Clause 90 as 'not inappropriate' in particular 'mineral extraction' and 'engineering operations' However, LI London is pleased to note that Policy SI11 Hydraulic Fracking states that development proposals for fracking should be refused, noting the high probability that these would be in the Green Belt or MOL.

¹ <https://www.london.gov.uk/press-releases/mayoral/call-to-community-groups-to-get-involved>

A1) – Development proposals are already being approved which have the potential to harm the Green Belt.² The Landscape Institute will be publishing a new report concerning Green Belt policy in spring 2018 (based on an autumn 2017 consultation). A related 2016 report is available online³.

8.2.1 - Regarding the re-use and intensification of brownfield land, and as LI London pointed out in our response to the Draft Environment Strategy, whilst we agree in principle that brownfield sites are often good choices as development sites (see Policy H1 2), we consider that some brownfield sites may be valuable in their own right or as part of the much-needed connectivity for wildlife, particularly invertebrates. There needs to be more recognition of such supplementary habitat sites that are not recognised as part of the SINC network of priority habitats^{4 5}. A similar point appears to be made in 8.2.2 about some 'derelict and unsightly' parts of the Green Belt as a reason for protecting it.

Policy G3 Metropolitan Open Land

A – LI London recommends that the statement needs to be clearer on what is or isn't 'inappropriate' development. All MOL should be protected from development not directly associated with improvements to the open space and its facilities, but it would be appropriate to upgrade (develop) play areas, cafes and other park elements.

D – 2) LI London considers that the issue of 'arts and cultural' activities can be contentious, so should not necessarily count as criteria towards designation as MOL. Whilst occasional arts and cultural events have been happening on open spaces for centuries e.g. circuses and fairs, negative examples include noisy privately run music events. An example is the highly contentious closing off of part of Finsbury Park, already MOL, for several weeks over the summer for festivals like Wireless, that are highly profitable for the organisers but less so for the local authorities and highly disruptive for local residents.

8.3.2 – LI London is concerned at the concept of 'land swaps' which would be detrimental to any MOL as a whole and also risk the fragmentation of greenspace and associated reduction in green infrastructure value. New greenspace provided elsewhere as a land swap would have to be able to meet or surpass the quality of the land being lost (historic, recreational, biodiverse) as well as meeting the requirements of the section D clauses and suggest this would only work if there is suitable adjacent land: unlikely in most inner city boroughs or areas of deprivation.

8.3.3 – The term 'landscape' improvement is a more acceptable term than 'landscaping improvement'. Also at 8.4.4.

Policy G4 Local green and open space

LI London broadly supports this policy, although we have the following concerns:

B – How is the creation of such spaces to be supported? There is little in the subsequent clauses to clarify this.

C - Areas deficient in access to public space are also likely to be under the greatest pressure for housing and/or other development, making it even more difficult to create more public open space.

² For example: <http://www.bbc.co.uk/news/business-32998019> (2015). A useful map of current proposals to build on protected Green Belt land can be found here: http://londongreenbeltcouncil.org.uk/threats_map/

³ https://www.landscapeinstitute.org/wp-content/uploads/2016/09/GreenBeltPolicy_LIConsultationFindings_Aug2016-003-1.pdf

⁴ <https://www.buglife.org.uk/open-mosaic-habitat-inventory>

⁵ <https://greenrooftraining.com/beyond-roofs-brownfield-gardening/>

D – As above, LI London agrees that the loss of Green and Open Space (GOS) should be resisted in areas of deficiency, but notes that such loss is currently taking place. If housing densities are increased as currently proposed then the result will be that more areas of greenspace deficiency are created since it is not possible to meet the proposed densities without loss of existing greenspace and reduced provision of new greenspace, which is being squeezed out in favour of more housing units. Even if the area of open space can be retained, it will be subjected to increasing pressure from the increased population.

8.4.3 — LI London agrees that the creation of new green or open space is essential, but again question how is this to be achieved when in practice it is being lost to development, particularly housing. See Natural Capital Accounting and Urban Green Factor.

Table 8.1

- Generally: Are distances shown as-the-crow-flies or walkable?
- Gardens are included as small open spaces – presumably this doesn't include private gardens, which are by definition not 'Public Open Spaces'?
- Pocket Parks – What about encouraging the boroughs or permitting residents to convert unnecessary parking spaces to pocket parks or parklets?

LI London has a related concern, where developers are trying to count leftover corner of greenspace on a masterplan, such as corners of car parks, as 'public open space' for their planning calculations, even if it is not suitable for any recreational purpose or for biodiversity. Green spaces reclaimed by community groups rely on goodwill for maintenance so may fail in the long term and local authorities don't have funding to take on more green space when their funding is already insufficient to enable them to look after their existing sites properly. Some partnerships have been successfully set up between skilled borough staff and volunteer groups. On the other hand, the demand for housing understandably results in such incidental green space being picked off for infill development.

Policy G5 Urban greening

A – LI London wonders why only 'major' developments should contribute to the greening of London. This misses an opportunity to encourage green building techniques and extend open space. Urban greening should be applied to all development.

B – Whilst LI London recognises that each borough will be able to decide exactly how their own Urban Green Factor (UGF) is calculated and when applied, we wonder whether, using the London Plan guidelines, there will be a minimum acceptable UGF that boroughs will need to take on, or just a 'suggested target'? The need for local variation is understood, but LI London is concerned that the UGF will be manipulated to minimise the provision of accessible green space. Why does the London Plan suggest a target of 0.4 for residential while the UGF for London report suggests 0.5?

8.5.1 LI London agrees with the principles of this clause, but is sceptical as to whether the inclusion of Urban Greening measures in new developments will actually deliver an increase in open space, although we acknowledge it should produce a beneficial increase in overall Green Cover. A balance needs to be achieved between accessible green and open space and spaces for wildlife that should be protected from public access.

Although the scoring schemes for Urban Greening Factors are relatively simple, with an overall score ranging between 0 and 1, the factor assigned to any particular surface cover type may vary from one planning authority to another.' (8.5.3). It may be more appropriate to define a specific limit across all

LPAs, in order to avoid high factors of low biodiversity or inaccessible green 'features' (as they are referred to on p.302, Policy G1, Clause A).

LI London considers that the installation of Green Roofs should be a separate planning requirement from the UGF. As the UGF for London report demonstrates, they can be used to achieve targets. However, whilst green roofs are beneficial, particularly to biodiversity, air quality and the environmental sustainability of buildings, they rarely contribute to usable/ accessible green and open space for people. LI London considers this is an important difference.

Green Roofs are already a requirement in many other cities / countries for certain types of new buildings. The UGF for London report does not include these, as it focuses solely on cities that have used UGF, which is very different from the Green Roof cities, some of which are listed below:

- Hamburg's Green Roof Strategy is based on a combination of financial incentive, dialogue, regulation and science⁶;
- Toronto – compulsory since 2010 along with other 'aggressive' green infrastructure policies (small residential properties are exempt)⁷;
- In 2001, Tokyo mandated new buildings 1,000m² or larger be covered by at least 20% of greenery⁸;
- Linz, in Austria is much smaller, but has compulsory Green Roofs as Linz had a serious industrial pollution problem⁹;
- Copenhagen was the first Scandinavian city to adopt a policy requiring green roofs for all new buildings with roof slopes of less than 30 degrees¹⁰;
- Basel, in Switzerland has the largest area of green roofs in the world per capita¹¹;
- San Francisco was, in 2016, the first US city to require that certain new buildings be built with a green roof – 15-30% of roof space on most new construction projects to incorporate solar, green roofs or a blend of both¹²; and
- Denver - 20% of rooftop space on buildings over 25,000 square feet required from Jan 2018¹³.
- Other cities have been incentivised to install green roofs, e.g. in Mexico City the city's environment secretariat is financing green roofs for their multiple environmental, educational and health benefits¹⁴. In France, however, a law making it compulsory for commercial buildings has been watered down.

8.5.3-4 and Table 2 Urban Greening Factor (UGF)

LIL is concerned that this will be used by developers to minimise the area of accessible / usable open space to maximise development of the site and make up the UGF by beefing up on the Green Walls and Green Roofs. Green Walls companies are already using this as a selling point. The UGF could be manipulated and become a tool to aid 'greenwashing'.

⁶ <http://climate-adapt.eea.europa.eu/metadata/case-studies/four-pillars-to-hamburg2019s-green-roof-strategy-financial-incentive-dialogue-regulation-and-science>

⁷ <https://www.toronto.ca/city-government/planning-development/official-plan-guidelines/green-roofs/>

⁸ http://www.greenroofs.com/Greenroofs101/industry_support.htm#Japan

⁹ <http://www.green-roof.group.shef.ac.uk/pdf/edmundmaurer.pdf>

¹⁰ <https://inhabitat.com/copenhagen-adopts-a-mandatory-green-roof-policy/>

¹¹

<https://fenix.tecnico.ulisboa.pt/downloadFile/3779580646989/Basel%20Switzerland%20Building%20regulations%20for%20green%20roofs.pdf>

¹² From National Geographic. 27th Oct 2016

¹³ <http://www.denvergreenroof.org/>

¹⁴ The Guardian, 24th April 2014.

Non-native species mixes and problems with long-term maintenance of green walls are also a concern. This is a relatively new technology and may prove unsustainable on all but the most high-end developments. An example is the failure of the green wall at Westfield Shepherds Bush. More research is needed on ecological value of green walls. There is extensive use of non-native perennials, grasses and ferns in green walls throughout London, which will presumably need replacing regularly and provide shelter but some species may produce little in the way of nectar rich habitat for insects.

This is recognised in the Urban Green F for London report, which suggests that it could become a tick-box exercise and also that the 2-D exercise may not be appropriate for the increasing numbers of very tall buildings in London.

LI London applauds the inclusion of soil volumes as a factor, with a higher factor for a more suitable quantity of soil, but questions whether the differential is sufficient to encourage better soil provision.

Should semi-natural 'flower-rich grassland' score the same top mark as woodland and 'semi-natural vegetation'? How can flower rich grassland that can be established in 1-2 years be comparably scored with mature woodland that has taken 100 years plus to establish and will support a vastly greater range of species?'

It may be more appropriate to define this high quality grassland as 'species-rich' rather than 'flower-rich'. This may include both (recreations of) native species grassland as well as colourful but non-native flower meadows.

Policy G6 Biodiversity and Access to Nature

B 5) – We note the uncertainty about European designations post-Brexit. Also at 8.6.1.

C – LI London is concerned that it appears to be acknowledged that situations will arise where SINC's are going to be subject to 'unavoidable damage', presumably because certain types of development (e.g. HS2) will take priority over SINC sites. How is 'unavoidable' damage to a SINC to be decided?

E – It would be helpful if the London Plan could clearly state that there will be a requirement for before and after comparative surveys / assessments, to enable a comparison to be made for a site, as recommended in the Ecology Consultancy's supporting document, such as Phase 1 Habitat Survey or BREEAM assessments?

Policy G7 Trees and woodlands

LI London is pleased to see the importance given to trees and woodlands.

B 2) – LI London would like to know how 'strategic' locations for tree planting are to be defined. These are currently done by each borough as part of their planning policy and tree policy reports, some much more effectively than others. Will the GLA have a London wide tree strategy in future?

C – LI London considers that 'unavoidable' might be a more appropriate word than 'imperative' where trees have to be removed.

8.7.1 – Trees deliver a great many benefits, but ‘filter noise’ is more perception than reality unless the vegetation belt is very wide¹⁵.

8.7.2 – LI London is pleased to see that ‘The Mayor wants to increase tree cover in London by 10% by 2050’ and reference to the Trees and Design Action Group (TDAG)’s guidance documents. It would be helpful to provide an indication as to whether tree cover is currently increasing or decreasing, and we look forward to the next i-Tree survey for this.

Policy G8 Food growing

A 1) – LI London would like to see a clearer steer as to *how* boroughs are to protect existing allotments and encourage new food-growing spaces when there is such pressure to take advantage of high land values when local authority funds are so low¹⁶. In practice, many allotments are no longer in local authority management and are self-managing, or trusts making them even more vulnerable to redevelopment by private owners, especially where long leases of land are now running out.

8.8.1, 8.8.5 - LI London considers that the Plan should include growing food initiatives within existing public parks that at the moment consist only of amenity grass with a few trees, although we recognise that maintenance budgets are already stretched. LI London is pleased to see reference to the Capital Growth Network¹⁷. This is an excellent way to help build local communities and create links with the boroughs. Such initiatives do much to increase the biodiversity of sterile spaces, including housing estates and the public realm as well as parks. The Edible Bus Stop¹⁸ and Incredible Edible Lambeth¹⁹ are good examples.

8.8.2 – LI London questions why only new schools are mentioned as having potential for food growing. There is a lot of scope for food growing to be carried out at existing schools – even Inner City schools with little outdoor space and no sports fields have potential for growing salad crops in planters, and elsewhere most schools could find space. LI London notes that no mention is made of growing food in schools in Policy S3 Education and childcare facilities.

8.8.4 – This clause refers to the Mayor’s Food Strategy, but as far as LI London can tell, the 2006 version has not yet been updated, despite a commitment to do so in early 2017.

¹⁵ <https://www.greenblue.com/na/trees-as-sound-barriers/> and <https://www.trees.org.uk/Trees.org.uk/files/8c/8c69f212-a82e-424b-96d1-c8ff6dc02403.pdf> (copyright required to reproduce)

¹⁶ https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/archives/archive-assembly-reports-plansd-growing-food.pdf. This is an archived GLA document from 2010, but still relevant – presumably the GLA are aware of it.

¹⁷ <http://www.capitalgrowth.org/>

¹⁸ <http://theediblebusstop.org/>

¹⁹ <http://www.incredibleediblelambeth.org/>

OTHER CHAPTERS – PLANNING LONDON’S FUTURE, SPATIAL DEVELOPMENT PATTERNS, DESIGN AND HOUSING

LI London does not intend to respond in detail to these chapters, but would like to make the following points:

CHAPTER 2 SPATIAL DEVELOPMENT PATTERNS

LI London is cautiously in agreement with the principle of densification, but are concerned that it will be extremely difficult to achieve without the loss of open and green space. The use of traditional mid-rise street patterns will be more appropriate to the context of many parts of London as a way to achieve high density.

Policy SD4 The Central Activities Zone (CAZ)

LI London is pleased to see recognition of London’s unique qualities in this section, in particular at 2.4.7, which refers to the importance of sustaining and enhancing London’s environment and concentrated heritage assets, including the River Thames, World Heritage Sites, and Designated Views as well as smaller waterways and green and open spaces. We are not sure whether the public realm should be referred to as a ‘more local feature’, however.

CHAPTER 3 DESIGN

Policy D1 London’s form and characteristics

Whilst these principles are fine in themselves, LI London considers that whilst they generally echo current Urban Design principles in a positive way, there is little in this entire chapter that is specific to London. However, the Design chapter does appear to integrate well with issues outlined in other chapters.

Whilst there is mention of design quality, context, heritage and distinctiveness, apart from a reference to ‘attractive, resilient places’, rather oddly linked to management of surface water (D1, B5), there is no mention in the London Plan of beauty, delight and the creation of inspiring places that people will take pleasure in visiting, or instil pride to live in a particular neighbourhood. LI London believes that it is important not to lose sight of these factors despite the pressure for housing development. It is possible to incorporate such value without adding cost. Communities need more than housing to develop into viable neighbourhoods.

Whilst it is accepted that duplication of policy should be avoided, LI London suggests that as a minimum there should be a cross-reference to Chapter 8 to emphasise that open spaces and green infrastructure are an intrinsic and interconnected part of London, especially now that London will be the first National Park City.

3.1.4 LI London is pleased to see a recommendation for ‘maximising urban greening’ and the creation of green open spaces, to help ameliorate the effects of climate change as well as place-making, ecological and connectivity benefits.

3.1.4, 3.2.8, D7 A and elsewhere - the word ‘landscaping’ should be replaced by landscape treatment, equivalent to ‘architectural treatment’. ‘Landscaping’ is a catch-all term with little meaning. Also it implies that ‘landscaping’ is detached from other elements and potentially seen as an optional add-on. If more planting is meant, then say so.

Policy D2 Delivering good design

3.2.7 LI London suggests that in addition to planning case officers and 'qualified urban design officers', that (Chartered) Landscape Architects should also be included in design scrutiny. LI London also recommends that the GLA requires ALL boroughs to appoint and run design review panels. Many don't and the result is that too many poor schemes go through the planning system unchallenged.

Policy D4 Housing quality and standards

Private Outdoor Space 'A minimum of 5m² for each 1-2 person dwelling and an extra 1 m² for each additional occupant' is very small: a car parking space is 11.5 m².

3.4.6 States that this space, however, should be practical in terms of its shape and utility. LI London is concerned that balconies are permitted to be the sole form of private outdoor open space, with the result that Boroughs are seeing a huge rise in planning applications where private balconies are being provided for each unit to meet this standard in full i.e. no actual greenspace per unit just access to 'fresh air'. LI London recommends that balconies are no longer acceptable as the sole form of private outdoor space. Alternatively, if they are, then the space standard should be increased to at least 8 m² + 1 m² per additional person.

Policy D6 Optimising housing density

A - LI London is concerned that this section seems lacking and focuses too much on efficient land use and transport connections/ capacity. It is not stated whether infrastructure capacity or "surrounding context" include green infrastructure.

3.6.6 – The clause refers to shared amenity space and high-quality public realm, but does not mention proximity to public open space. Housing density (3.6.9 & 10) assessment is complicated.

Policy D7 Public Realm

LI London considers that the population's needs (not to mention carefully planned improvements to existing public parks) are a vital element of London's green infrastructure. LI London requests that this be rectified and in some detail to match the existing clauses on design of town centres, highways and incidental landscape treatment currently described.

Throughout the entire 'public realm' section, the only mention of public parks is in a note referring to public drinking fountains (3.7.11). Excellent design of new public parks and greenspaces is vital if London is to meet the needs of an increasing population. As a minimum there should be cross-referencing to Chapter 8.

B and C – LI London considers that it is important to achieve a balance and hierarchy of spaces and movement – otherwise one use can dominate another e.g. running a busy cycle route through a quiet area of greenspace needs care to avoid loss of tranquillity and severance of pedestrian areas, such as the Hyde Park cycle lane.

I – LI London advises that the last sentence requires clarification. It is agreed that applications solely to introduce 'unnecessary street furniture', such as advertising signs and free-standing cash machines should be refused. For larger developments, it would be more appropriate to include a simple statement recommending developers minimise street clutter and give careful thought to the use, design and location of street furniture.

J – LI London is unclear why ‘open street events’ are innovative. There are better examples of innovation, such as ‘smart city’ developments.

M – LI London welcomes the principle of water fountains for health benefits and to help eliminate single-use plastic, but there is no funding available to councils to maintain them and they become vandalised and out of order, quickly frustrating local people. There is a similar issue for public toilets which become sites for anti-social or criminal activity.

3.7.1 – LI London considers that this clause should include specific mention of parks as well as squares and open spaces: see chapter 8 definitions. ‘Open spaces’ is not another word for ‘parks’.

3.7.3-3.7.4 - LI London is concerned that quiet residential streets are predominantly used for parking throughout London. Boroughs, and developers, must be persuaded to ensure shared streets are kept free of cars in the long term, for example by refusing permission for car parking within developments. ‘Home-zones’ have been trialled in the UK for 20 years but the concept has failed to work in many locations due to the perception that the public has an overriding love of private cars, although car use is actually declining²⁰. Car ownership is only around 30% of households in some boroughs. LI London supports the Mayor’s Healthy Streets Approach.

Some boroughs, e.g. Islington require car-free development in some instances, and car free development was already in the previous London Plan (policy 6.13). This may be more acceptable in inner-city than the suburbs. Better public transport, more car clubs, more home deliveries and high parking permit fees can all help to discourage private car ownership.

3.7.8 - LI London considers that this clause is unclear and needs rewording. Whilst the concept is admirable, clarification is needed as to how can this work – all developments will affect neighbouring public realm and local authorities are restricted as to how they can require a developer to mitigate this. S106 and the Community Infrastructure Levy (CIL) may be requested, and in some cases used, but what if the adjacent ‘public realm’ is privately owned? Nearby locations may be suggested where the borough considers there is a deficit/need, but this doesn’t help the immediately affected locations.

3.7.10 - LI London considers that whilst safety is paramount, the lighting of open spaces be carefully reviewed as it is beneficial to maintain ‘dark sky’ areas e.g. public parks for the benefit of wildlife e.g. bats and birds, in addition to reducing light pollution..

3.7.11 See comment on drinking fountains.

Policy D8 Tall Buildings

LI London is concerned that there is little reference to the visual impact of the rapidly expanding numbers of tall buildings on the overall skyline and how this is changing London’s unique character. LI London has drafted its own skyline policy, which aligns well with Barbara Weiss’s Skyline Campaign.²¹ However, LI London is pleased to see Clause C f) stating that buildings near the River Thames should not contribute to a canyon effect or adversely affect strategic views.

3.8.1 LI London is concerned that amongst the justifications for needing tall buildings is the suggestion is that they will help people navigate around the city. Whilst all buildings grouped in the city of London and Canary Wharf used to reflect this, the recent change allowing a ‘pepper-pot’ scatter of tall buildings across London reverses this effect. This reduces the distinctive character of high-rise

²⁰ <http://peakcar.org/wp-content/uploads/2015/07/Metz-CaseStudies-1-5-15-pdf.pdf>

²¹ <http://www.skylinecampaign.org/>

hubs, whilst allowing bland or unsuitable towers to pop up completely out of context in highly unsuitable locations.

3.13.6 - LI London would like to see further development of the Tranquil and Quiet Areas concept.

CHAPTER 4 - HOUSING

LI London strongly suggest that there is a need to consider densification by mid-rise and terraced streets in preference to high-rise (Create Streets), as well as changes to the matrix for measuring, and whether building in suburban gardens will reduce the amount of publicly accessible open and green space.

CHAPTER 5 – SOCIAL INFRASTRUCTURE

LI London generally supports this chapter, apart from a couple of small concerns below:

Policy S4 Play and informal recreation

B – B2 d) Trees and planting linked with children's play areas add extra dimensions to play, provide contact with nature and improve the setting visually, but planting within play areas often fails to establish or gets trampled or damaged by over-enthusiastic children, for example the Diana memorial playground, Kensington Gardens. LI London therefore recommends that a good range of suitable planting should be provided adjacent to children's play areas. Children can then also be encouraged to explore a wider area and interact with their environment whilst reducing stress on individual planting areas.

5.4.3, 5.4.4 - LI London would welcome more clarity on differentiating between formal play provision requirements and informal 'play on the way' type opportunities within new developments. Developers may inappropriately seek to count incidental play e.g. random boulders in a planting bed, as part of their formal 10m² per child play area provision.

More guidance is also needed on separate but still formal provision of youth activities (e.g. skate, parkour, seating and hangout areas, Multi-Use Games Areas (MUGAs) and goal ends, outdoor gym equipment and high energy play kit, all of which are best located away from formal children's play areas and fill the activity gap for the 13-17 years age range, who would not want to be seen in a playground but have nowhere else to go.

5.4.6 - LI London notes that this recommendation is difficult to implement. Whilst the idea of schools permitting out of hours public use of their grounds is to be encouraged, the actual take up is still relatively low due to issues with managing the school site safety and security. Supervised use of school grounds for community sports and after school clubs does happen but open access for informal play seems to be an impossible goal unless funds are made available for staffing and extra cleaning and safety checks each day.

Policy S5 sports

LI London supports the policies and clauses in this section and supports the continued recommendation to protect existing playing fields and to provide a good range of formal and informal sports activities such as healthy walking and outdoor gyms. The latter should be designed to work in association with development of other London Plan policy recommendations including green infrastructure, pedestrian and cycle routes and access to wildlife.

5.5.2 - LI London is concerned greenspace may be lost to the provision of Artificial Grass Pitches (AGPs) in public parks and recreation grounds. These pitches are often floodlit and fenced for organised fee paying sports, despite often being in public parks. This leads to a reduction in available free to use playing fields and a loss of greenspace, as artificial turf is synthetic.

CHAPTER 7 – HERITAGE AND CULTURE

LI London supports the proposals and policies in the heritage sections of this chapter (7.0 - 7.4.1 and policies HC1-4) which are well considered and provide clear policy guidance.

CHAPTER 9 – SUSTAINABLE INFRASTRUCTURE

This chapter covers Air Quality, but doesn't seem to be much about Climate Change. This was covered in more detail in the Mayor's Environment Strategy.

Policy SI4 Managing Heat Risk

B 2 - LI London notes the inclusion of green walls and roofs as useful contributors to the reduction of heat entering buildings, and at 9.4.2 in relation to alleviating the urban heat island effect, although there doesn't seem to be any mention of the value of the shade of large canopy trees in the public realm in achieving similar benefits.

Policy SI11 Hydraulic fracturing (Fracking)

9.11.3 – See comment at G2 (above).

9.11.4 – LI London notes that this clause effectively states that a Landscape and Visual Impact Assessment (LVIA) or Townscape and Visual Impact Assessment (TVIA) would be required for as well as Traffic and other assessments, presumably as part of an Environment Statement (ES).

Policies SI12 Flood risk management and SI13 Sustainable Drainage

SI13 B - LIL supports the proposed hierarchy of preferred SuDS proposals for surface water run-off given in this section. However, we note that whilst a 'drainage hierarchy' is identified, including the recommendation to prioritise rainwater harvesting, blue, green and brown roofs and above ground attenuation with lowest ranking given to the currently very popular below ground attenuation tanks (no benefit to people or wildlife) or simple connection to existing sewers (no longer permitted except in special circumstances?), it does not specifically mention rain gardens, swales, SuDS (although similar is referred to), or the value of tree roots which can help to absorb surface water flooding.

Policy SI 14 Waterways – strategic role

LI London is broadly supportive of this policy.

CHAPTER 10 – TRANSPORT

LI London broadly supports the proposed Transport policy, in particular the aim to reduce car-dependency and encourage a modal shift towards walking, cycling and public transport, and the Healthy Streets Approach, but has the following comments / queries:

10.5.1 and Policy T5 - LI London is concerned that there is no reference to extension of the Cycle Superhighways. Instead, there is to be a new London-wide network of 'strategic cycling routes with new routes and improved infrastructure' that is not further described, defined or mapped in the document.

LI London considers that it is at least as important to provide a coherent, consistent, network of safe, convenient cycle routes, as it is to provide cycle parking and cycle hire. We are concerned that the indicative list of transport schemes at Table 10.1 is too vague and will not deliver such a network.

There doesn't appear to be anything specifically about encouraging or recommending segregated cycle routes. These are particularly important for inclusivity and to encourage women, older people, children and other less confident people to feel safe enough to cycle.

10.5.5 - LI London is pleased to see that cycle facilities for disabled cyclists are to be included.

10.5.6 - LI London considers that it is more important to encourage parents/carers not to drive children to school, so should *not* provide vehicle drop-offs or car-parking. Few London schools are inaccessible by foot, cycle or public transport.

LI London notes that The London Plan seems to be strangely limited on roads, though rail is covered more comprehensively.

Policy T7 Freight and Servicing, Clauses D to G

Congestion and deliveries:

LI London is pleased to see encouragement of deliveries at off-peak hours and by modal shift to sustainable last-mile movements, as a significant amount of congestion is due to deliveries – not only to businesses & retail, but to individuals from on-line shopping.