

## Draft New London Plan - Consultation

Dear Consultation Team,

I am responding - as a private individual and London resident - to the consultation on the draft New London Plan.

I am pleased that the draft recognises the importance of green spaces. However, in a climate where London needs to build 66,000 new homes each year, policies need to be stronger if they are to give green spaces adequate protection.

In particular:

- Protecting the Green Belt requires even stronger enforcement
- It should not be possible to "swap" designated Metropolitan Open Land
- Private and public gardens should be protected alongside other local green and open spaces
- Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows
- There should be more emphasis on biodiversity as a key component of green infrastructure, and as an unquantifiable element of natural capital

The following more detailed response provides more detail on how draft policies can be amended and improved to deliver these objectives.

### Policy G1

I welcome the green infrastructure approach and the associated concept of ecosystem services. However, it is important that the inherent value of biodiversity is recognised, over-and-above the economic gains from ecosystem services as it appears in natural capital valuations.

I welcome the requirement for Boroughs to produce Green Infrastructure Strategies. These should make clear reference to Boroughs' Biodiversity Action Plans, which should be updated (many appear to be out-of-date). A firm deadline should be set for the production of Green Infrastructure Strategies, along with a requirement to refresh after (say) five years.

### **Proposed changes**

- The wording of Policy G1C should be strengthened, giving a stronger requirement for Boroughs to identify the importance of green infrastructure assets and opportunities for intervention.
- Add reference to BAPs.
- Set a deadline for production of Green Infrastructure Strategies.

### Policy G2

I welcome Policy G2, particularly the proposal in Policy G2B that "de-designation" of Green Belt will not be supported. This needs to be reinforced for it to be effective.

#### **Proposed change**

- A presumption against the alteration of Green Belt boundaries that reduce its extent should be included in Policy G2B so that it reads: **"The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt"**.

### Policy G3

Given the pressures on land use in London, I urge that Metropolitan Open Land (MOL) be protected, retained, and that public access is ensured. Therefore, I welcome the recognition that MOL should be protected from inappropriate development, but this is undermined by Policy G3C and the provision for "land swaps". MOL is characterised by its "permanence", so land swaps are inappropriate.

#### **Proposed changes**

- Policy G3C should be deleted along with the sentence in paragraph 8.3.2 "The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy".
- Policy G3B should be amended to read: **"The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs."**

### Policy G4

I am concerned that Policy G4 contains insufficient recognition of the contribution of private gardens to the extent of green space. A policy is needed to prevent widespread "garden grabbing".

#### **Proposed change**

- Policy G4A should be revised to include reference to private gardens to read: **"Local green and open spaces, including public and private gardens, should be protected"**.

I welcome support for the creation of new areas of accessible green and open space. These provisions should be strengthened by requiring measures in Policy G4 to improve the quality of green space.

#### **Proposed changes**

- **Policy G4C should read "Assessments should identify areas of public green and open space deficiency, including an assessment of deficiency in quality, taking account of Green Flag criteria, noise and air pollution, and using the categorisation set out in Table 8.1 as a benchmark for all the different types required."**
- Policy G4E 1) should include at the end **"including an assessment of, and where appropriate a plan, to improve the quality of the space"**.
- Policy G4D opens the door to off-setting. I do not support this, as it encourages degradation of original biodiversity, which cannot be replaced. The "replacement" is rarely, if ever, like-for-like. This builds in a mechanism for creating a net loss of biodiversity.

The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space, and other relevant policies amended accordingly.

### Proposed changes

Additions should be made to Policy D13 Noise as follows:

- Para B: Boroughs [etc] should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations **and ensure local green space is improved in line with Policy G4 (as amended) including by:**
- **taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution, using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or introducing natural or man-made noise barriers.**

The provision and improvement of green space requires funding to help deliver the Mayor's aspirations for Good Growth and increasing London's green cover and this should be addressed in Policy DF1.

### Proposed change

- Policy DF1 D (2) should be amended to read as follows: "Recognise the importance of affordable workspace and culture and leisure facilities, **including public green and open space**, in delivering good growth."

### Policy G5

Overall, I welcome the concept of an Urban Greening Factor. However, the UGF outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their experience.

### Proposed change

- Policy G5 – a further sub-section should be added as follows: **(C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.**

Further comments:

- It is inevitable that developers will manage down to the minimum UGF, minimising costs as they do so. In para 8.5.4 the proposed office development has a UGF of 0.54, well above the target 0.30. The developer could omit all the amenity grassland and open water features and reduce the green roof from 600m<sup>2</sup> to around 430m<sup>2</sup> and still meet the target. Why would he not do this?
- I believe that allowing Boroughs to develop their own approaches to the UGF risks confusion and a devaluation of the system as they compete for private development incomes.
- I welcome the mention of green roofs, providing these are designed for biodiversity (i.e. not just rough grass). The same applies to green walls, though these are more expensive to build and maintain, and are less environmentally friendly as a result. Green roofs and walls must not be used as ways to justify the loss of existing green spaces - or as reasons to avoid

including green spaces in developments. Children cannot play on green roofs and walls, and they are limited in the biodiversity that they can support.

#### Policy G6

It is important that this Policy is properly enforced. The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife. I support the Policy G6 A about protection of SINCs.

I especially support the specific mention of green corridors, as these can be disproportionately valuable for biodiversity and for the well-being of residents and visitors.

Off-site compensation is not supported, as it does not adequately compensate for the loss of on-site green space and associated biodiversity.

#### **Proposed change**

- The following sentence should be added at the start of sub-section D **"All new development should seek to achieve a net gain in biodiversity."**

#### Policy G7

Mature trees are a vital part of London's green infrastructure and there should be strict controls over felling them in Policy G7, along with recognition of the importance of established hedgerows. The policy to protect - and expand - London's urban forest is supported.

Tree selection - whether for protection or planting - should be based on broader considerations than BS 5837:2012. The focus should be on native species and on a range of trees that support biodiversity. For example, London Planes are resilient and have important heritage value, but produce neither pollen nor nectar and are very poor for biodiversity.

#### **Proposed changes**

- The value of hedgerows should be recognised in subsection B 1) of Policy 7 by amending it to "protect "veteran" trees, **mature hedgerows** and ancient woodland...".
- The first sentence of Policy G7(C) should be amended so it reads as follows: "Development proposals should ensure that existing trees of quality, **mature trees and hedgerows, and trees of value in terms of delivering ecosystem services such as water or air quality management**, are retained.

#### Policy GG2 and H1

I welcome the overarching policy GG2 concerning making the best use of land. This should be strengthened by reference in policy H1 to making use of excessive or redundant road space.

#### **Proposed change**

- Policy H1 B2d) should be amended to include reference to excessive or redundant road space and other car-related infrastructure so that it reads **"the redevelopment of surplus utilities and public sector owned sites, including excessive or redundant road space."**

#### Policies D1 - D6

I broadly welcome policies D1 to D6 that seek to improve the design and land use efficiency of new housing. Policy D6 concerning the optimisation of housing density needs to be amended to avoid a lack of associated public infrastructure, and excessive housing densities and "town cramming".

**Proposed changes**

- The phrase "in exceptional circumstances" should be deleted from the last sentence in Policy D6B 3) so that it reads "**This may mean that development is contingent on the provision of necessary infrastructure and public transport services...**".
- The density levels specified in Policy D6C should be amended to 80, 170 and 260 units per hectare respectively so that it reads: "**1) 80 units per hectare in areas of PTAL 0-1; or 2) 170 units per hectare in areas of PTAL 2 to 3; or 3) 260 units per hectare in areas of PTAL 4 to 6**".

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Ends