

London Plan Examination in Public

Matter 40 Public Realm

Friends of the Earth (755)

M40. Would Policy D7 provide a justified and effective strategic framework for delivering high quality public realm? In particular:

- a) Would Policy D7 relate to strategic planning matters, particularly in relation to street furniture and management and ongoing maintenance of the public realm?**
- b) Would the criteria of the policy be justified and effective, in relation to matters such as sunlight, the natural environment and meanwhile uses?**
- c) Overall, would it provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to this matter?**

1. Policy D7 sets out some welcome measures in relation to street furniture and management and ongoing maintenance of the public realm. However, the policy does not appear to address matters relating to sunlight and daylight. In addition, insufficient consideration is given to providing and maintaining space for nature to thrive in the public realm. These are crucial considerations, particularly so given the Plan's focus on achieving higher densities by building upwards.
2. With more tall buildings, streets and public spaces- the public realm - will become increasingly overshadowed and darker, leaving fewer opportunities for people to experience sunlight, which is essential for good health. However, depending on various factors including topography, site curtilage, minimum set-backs and layout it can be possible to accommodate height with minimal loss of sunlight and daylight. Places that are sunlit are more attractive and in turn likely to encourage more people to walk and cycle and spend more time outdoors.
3. To be effective, the policy should be amended to explicitly require consideration to be given to daylight and sunlight with a view to safeguarding good levels of daylight and sunlight in the public realm, and minimising their loss and identifying and taking advantage of opportunities to create attractive sunlit spaces within the public realm.
4. Another matter where the policy appears weak relates to the natural environment. Street trees are an integral part of the public realm in London as are those in parks and gardens. It is therefore surprising that trees are not mentioned in the policy especially given that they

meet so many policy objectives, such as providing shelter, supporting biodiversity and enhancing health - physical and mental.

5. There are a number of other factors crucial to creating and maintaining a high quality, environmentally sustainable public realm which the policy does not address or addresses inadequately. This includes:
 - Recognition that 'vibrant' spaces are not appropriate everywhere or all the time. Tranquil spaces are essential for people and wildlife to thrive;
 - Recognition of the role of waterways or 'blue' infrastructure - existing and new - and their vital contribution to the public realm and opportunities and needs in this regard;
 - A commitment to and requirement for conserving and restoring urban nature as an integral part of and alongside new development. We suggest the policy refer to the need to retain mature trees;
 - Consideration of the role of sustainable infrastructure in the public realm.
6. As currently worded the policy is not considered justified or effective in relation to matters such as sunlight or the natural environment. However, with amendments to address concerns outlined above it would be more likely to do so.

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