

London Plan Examination in Public

Matter 64 Green infrastructure, open space and urban greening

Friends of the Earth (755)

Would the policies for green infrastructure assist in creating a healthy city in accordance with Policy GG3 and will they provide an effective strategic context for the preparation of local plans and neighbourhood plans?

1. We consider that Policy GG3 will be supported by the urban greening policies because for too long, urban nature and its value has been overlooked and not considered as central to planning policy and outcomes. Providing proper green infrastructure and amenity as part of, and alongside, new housing presents architectural, design and planning challenges, but these are the challenges of our age. Raising the quality of development and its surroundings, by ensuring green infrastructure is an integral part of proposals, not just focusing on the quantity of housing, will help avoid society being passed the costs and consequences of poor development such as inadequate access to local space and opportunities for engagement with nature and the inability to enjoy outdoor exercise and recreation.

Are Policies G1, G4 and G5 and their detailed criteria justified and necessary and would they provide an effective basis for development management?

2. These 'greening' policies reflect that too much built development has, and still does, harm nature and fails to properly incorporate 'green' features which can aid health, resilience and the urban realm. The policies seek to raise the quality of design of individual houses, developments and sites as a whole to address the growing needs of society for quality spaces and places that support good personal health and lifestyles, community cohesion, urban resilience, and more. Development, planning, architectural, surveying and other professions are keen to demonstrate how they are addressing this broad, integrated agenda and either have, or are developing, the skills to improve how development takes place such as greatly enhancing energy and water efficiency to planning how land can be multi-functional.

3. Policies G1, 4 and 5 do not hold back development; they help make it fit for purpose by avoiding poor use of land, materials and resources including public and private finance. A test of the policies is whether they properly draw on the data, evidence and ongoing monitoring and require these to be used by Boroughs, communities, land managers and developers.

How would they affect the implementation of Policies GG4 and GG5 on delivering the homes Londoners need and growing a good economy?

4. Policy GG4 refers to housing meeting "high standards of design", providing for "*identified needs*" and "*planning for all necessary supporting infrastructure from the outset.*" Healthy communities are poorly served if their housing lacks proper access to local green and open space and other amenities which any community could reasonably expect to enjoy.

6. Implementation would be well served by ensuring that the quality of design of individual houses and development sites are raised to address the imperatives, not just of housing the population, but doing so in ways that help improve environmental conditions and performance in all locations. As well as improving the quality of developments, which will exist for many decades, the policies are consistent with the economy operating within, not beyond, society's needs especially extant environmental pressures which are increasingly shown to have direct and indirect effects on public health, personal welfare and economic resilience.

a) Is the Mayor's target of making more than 50 percent of London green by 2050 and its designation as a National Park City justified and achievable?

7. Designation of London as a National Park City is justified and achievable. It requires the kind of policies in the London Plan to ensure land is used more wisely and in better considered, multi-functional ways than has been the case for many years. We support the Mayor's target of making London more than 50% physically green (and/or blue). This is not simple task; the extra space required to meet the target is unlikely to be realised via large sites alone. Large sites can, of course, play their part but the target will require attention to be given to the 'greening' of overlooked areas, areas between and behind buildings, smaller and medium sized sites (see Policy H2), business parks, road sides, domestic dwellings, residential roads and high streets.

8. Great care will need to be taken with regard to how achieving the 50% green cover target is interpreted in practice. Street trees, green roofs and green walls are not an adequate substitute for the loss of publicly accessible green, open space. The London Plan should make clear that while these features have value they are not a substitute for existing and high quality accessible green (and blue) space. To that end, we note and endorse the proposed amendment to Policy G5 that "*Existing green cover retained on site should count towards development meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.*" The weighting given to different types of surface cover in the proposed Urban Greening Factor reflects that not all forms of green infrastructure are of equal merit.

b) Do the policies adequately reflect the qualitative differences and value of different types of green infrastructure, including open and green space and the role of waterways (blue space) and the access to it?

9. See answer to d) below.

c) Given the All London Green Grid is it necessary for Boroughs to prepare green infrastructure strategies in accordance with Policy G1 B?

10. The ALGG is a useful framework and guidance without the London Plan's statutory weight; its existence does not obviate the need for Boroughs to have policies on, and detailed understanding of, their 'green' features, assets and ecosystems and how these function, or should function, across boundaries. Indeed, it is not clear how well the ALGG is driving increased green (and blue) space provision to improve connectivity and access to boost biodiversity and resilience. Improved monitoring of its progress through Borough strategies and reporting would help a great deal. It is important that the Mayor brings forward updated SPG on the ALGG and how it is supported by use of good data, evidence and monitoring.

d) Does Policy G4 provide sufficient protection for the amount and quality of all green and open space including private gardens and allotments and on housing estates? Is the categorisation in Table 8.1 justified? Should the policy refer to the improvement of existing spaces?

11. The policy would benefit from amendment to recognise the wide variety of green open spaces in London that need protecting, including allotments and residential gardens, on housing estates, informal green spaces, garden squares - not all green spaces that need protecting fit the category 'public open space'. There is concern that the Mayor's suggested deletion of 'green' in numerous places throughout the policy, including the title, will make the policy narrower in scope and potentially less robust.

12. In addressing open space deficiencies Policy G4 should refer to the improvement of existing spaces as there is considerable potential to elevate the quality of existing areas, such that they support biodiversity, provide linkages across the urban landscape and are more publicly accessible for recreation, education and relaxation. The policy should address more explicitly the need to consider both the quality of the green open space and how this can be maintained and enhanced to benefit people and nature. Regarding the categories in Table 8.1, we suggest this is broadly correct. However, the table should recognise that informal green open space to which the public has access is often of considerable value to the local community and other users of such spaces. The table should highlight that such spaces should not be overlooked but factored in to plans and decisions. Town Greens, which are protected in perpetuity, and which confer local people recreation rights, should also be added to this list.

13. The draft Plan omits explicit protection for residential gardens. We are concerned that without a policy presumption against developing back gardens as set out in the current London Plan (2016 version) *Policy 3.5 Quality and Design of Housing Development* the rates of loss of garden land in London will accelerate. The London Plan should require Boroughs to apply a more discerning approach such as by accommodating development on the footprint of the existing developed areas and retaining or providing the equivalent amount of garden land to serve the new development.

15. London's parks face growing pressure to accommodate commercial uses. Depending on the nature and duration of the activity these have the potential to cause significant harm. Many of London's parks and open spaces offer a tranquil retreat from the bustling, noisy and built up urban environment, giving users / visitors the opportunity to enjoy nature, attractive green surroundings and potentially experience a variety of wildlife even in a semi natural or wholly man-made setting. These activities can cause significant disturbance (built structures, lighting, motorised vehicles, noise, litter, and traffic) detracting from enjoyment of the open space and impacting on wildlife. Strong planning policies are needed to limit the duration and extent of activity that may be permitted and to ensure events are only permitted after consultation with users, for a short duration only, where possible providing for the majority of the open space to remain undisturbed, and requiring site restoration to be carried out swiftly to an acceptable standard otherwise penalties should apply. Policy G4 should provide a steer on these matters to ensure a consistent, robust London-wide approach.

e) Is the expectation that Boroughs develop an Urban Greening Factor based on Policy G5 and Table 8.2 justified with particular regard to viability and practicality?

14. The Urban Greening Factor is a helpful guide to demonstrate practical delivery and to elevate ambition instead of settling for lowest common denominator features such as trees in paving and amenity grass and planting of little or no biodiversity benefit.

15. A question arises about the degrees of public and private recreational access and how these are weighted. For example, the 0.4 factor given to amenity grass may reflect its low biodiversity value but not necessarily its role for recreation. Also, the Factor must avoid the potential risk, however unintended, that with amenity grassland rated 0.4 and roofs and trees rated 0.7 to 0.8 the table effectively promotes the replacement of open spaces with green roofs and trees. A species poor (regularly mown lawn) can be improved to become species rich and be open space whereas once land is developed it never becomes open space again.

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