



ORGANISATION	LONDON FIRST
ID	1588
MATTER	M64 GREEN INFRASTRUCTURE, OPEN SPACE AND URBAN GREENING

M64. 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? Are Policies G1, G4 and G5 and their detailed criteria justified and necessary and would they provide an effective basis for development management? How would they affect the implementation of Policies GG4 and GG5 on delivering the homes Londoners need and growing a good economy? In particular:

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?

1. These issues are referenced at paragraph 1.2.6 of the draft Plan, which states:

“Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering more than 50 per cent green cover across London, will be important to help London become a National Park City.”

2. This is the only reference in the draft Plan. There is no reference to London becoming more than 50 per cent green, or becoming a National Park City, within either the Good Growth objectives or the green infrastructure policies in Chapter 8.

3. The aspiration for London to become a National Park City is bold and attractive; but requires considerable work at both a policy and practical level. The Plan cannot commit to such an ambition without this. London First believes that the purpose of the draft new London Plan Examination is to assess the justification and effectiveness of the green infrastructure, air quality, biodiversity, and nature conservation policies in terms of their implications for design, viability, and thus delivery of development. The effectiveness of those policies, individually and cumulatively, will determine London’s ability to become more than 50 per cent green or a National Park City.

4. For these reasons, London First suggests that the extract above from paragraph 1.2.6 of the draft Plan should be amended thus:

1.2.6 Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, ~~delivering more than 50 per cent green cover across London, will be important to help London become a National Park City.~~

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?

1. The green infrastructure policies in Chapter 8 are entirely focused on a quantitative outcome. G1 refers to the protection of existing green and open spaces and the need for development proposals to incorporate elements of green infrastructure, but there is no reference to enhancing the quality of existing infrastructure. Similarly, G4 requires Development Plans to identify areas of deficiency, but makes no reference to the improvement of existing assets. Finally, G5 is wholly focused on a quantitative outcome, allowing no flexibility for qualitative assessment of different types of provision, which again would result in a more sustainable outcome.
2. Where existing green and open spaces are of poor quality and not making a positive contribution to their local community, opportunities should be taken to enhance them. This more nuanced approach, which identifies opportunities to improve poor-quality spaces in tandem with opportunities for new provision, would deliver a better outcome for Londoners, rather than simply focusing on increasing the volume of notionally defined green space.

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

1. The All London Green Grid (*The Mayor's Green Infrastructure and Open Environments Supplementary Planning Guidance*, 2012) focuses on London's strategic green infrastructure framework. At the borough level, Local Planning Authorities should be preparing a more detailed green infrastructure strategy for their Local Plan evidence base in any event, including categorisation of existing green infrastructure (in quantitative and qualitative terms), identification of any areas of deficiency, and identification of opportunities to improve the quality and accessibility of existing assets, with particular emphasis on areas identified for housing growth.

2. It is vital to ensure that work undertaken at borough level complements strategic work undertaken by the GLA, thus preventing duplication of work and ensuring the most efficient use of resources. Work undertaken by the boroughs should feed into the All London Green Grid; it is the responsibility of the Mayor to ensure that there is appropriate cross-borough collaboration.

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?

1. Policy G4 specifically concerns publicly accessible open space. Private residential gardens are, by very definition, not publicly accessible; some allotments are privately owned; other allotments and housing estate spaces are regarded as semi-public. They do not fall within the remit of G4, and it is not its purpose to protect them.
2. Such protection is provided by other policies in the draft Plan. The definition for Previously Developed Land in the Glossary clarifies that private residential gardens and allotments are excluded. Specifically in relation to building on private gardens, Policy H2: Small sites makes clear that where infill residential development is brought forward, maximum ground-coverage limits are set (H2D) and there must be no net loss of overall green cover (H2HB). Furthermore, in relation to allotments, Policy G8: Food growing seeks to protect existing allotments and encourage new provision.
3. As stated above in respect of (b), G4 should refer to the enhancement of existing assets, where required, to ensure that poor-quality open spaces are improved and make a more positive contribution to their local community.

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?

1. London First supports the overarching aim to increase the extent of green surfaces in London, consistent with the other objectives within the Plan, but considers the policy onerous because of the restrictions it places on scheme design and the possible detrimental impact on scheme viability. G5 currently has the potential to undermine delivery and the Good Growth objectives.
2. The ability for any development or building to deliver urban greening will vary depending on location, proposed use, and operational requirements. In densely developed locations in London, site coverage tends to be high; there is limited scope for greening other than in the form of a green roof and possibly

green wall(s), depending upon proximity of neighbouring buildings and orientation. However, plant and machinery often need to be located at roof level. Allocating a proportion of internal accommodation for plant and machinery, to allow a green roof on top of the building, will worsen the net to gross ratio and significantly impact on the viability of the scheme. Similarly, it will restrict the provision of on-site renewable energy infrastructure, commonly provided in the form of roof-top photovoltaic panels. It is also noteworthy that energy policies elsewhere in the Plan encourage developers to make greater use of heat pumps, which have additional plant requirements at roof level compared to alternatives that have been more commonly used in the past. For these reasons, G5 should allow off-site provision, possibly through a payment-in-lieu or a credit system in a portfolio approach, in exceptional circumstances and where justified.

3. London First's March 2018 representations expressed concern that the GLA's *London Plan Viability Study* (December 2017) had not properly tested the costs of delivering urban greening. Appendix H of that Technical Report stated that the costs of urban-greening measures had been included in the external works cost, but, as these were based on benchmarks (existing developments), it was highly unlikely that the costings reflected new draft policy requirements. As noted above, to achieve an Urban Greening Factor (UGF) of 0.3 in central London changes to building form are likely to be required, such as creating an extra floor for services equipment to enable the roof to be fully greened.
4. The GLA has since published its *London Plan Viability Study Addendum Report* (November 2018). The GLA has acknowledged that the point made by London First was a valid one, and the Addendum Report confirms that an additional cost allowance has been made for urban greening in the updated viability appraisal. However, without sight of the GLA's model, it is impossible to verify the approach and consequential adjustments. In broad terms, this is another cost on development that contributes to the cumulative impact of the draft Plan on development viability. In our written statements in respect of M92 and M93, London First will explore these issues further.
5. In Table 5.2: *Assumptions used in the sensitivity testing* (page 40) and in paragraph 1 of Annex D of the November 2018 Addendum Report, similar statements are made to suggest that the majority of urban-greening types identified in Table 8.2 of the draft Plan are already typical within landscape design. In particular, paragraph 1 of Annex D states:

“Turner and Townsend have confirmed that the majority of urban greening types are already typical in developments and it is expected that developments would apply other types only if there is a commercial case for doing so.”

6. Yet clearly the aim of G5 is to increase the green areas being developed on schemes, therefore the range and size of green areas will need to increase to satisfy G5. As discussed above, on constrained urban sites, such as in central London and in town centres, this will include a greater number of green roofs. Whilst these bring significant sustainability benefits, they carry additional costs, not only in the delivery of the green roof itself, but the knock-on effects of having to use internal accommodation for plant and machinery and preventing the use of roof-top renewables. The impact of these additional costs on viability must be acknowledged in terms of the ability of a scheme to meet other policies in the Plan, such as the delivery of affordable housing or affordable business space.
7. London First also wishes to raise concerns regarding the approach to calculating the Urban Greening Factor (UGF) in the evidence base report *Urban Greening Factor for London* (The Ecology Consultancy, July 2017). G5's target UGF figures of 0.4 and 0.3 for residential and non-residential floorspace respectively are based on just three case studies in Appendix 2 of that report (two residential and one commercial). This limited sample is unrepresentative of the full range of development types and built form in London. Hotels, industrial, retail and mixed-use schemes have not been tested. The calculation methodology does not reflect areas of a building where green infrastructure is unachievable: for example, sloped or mansard roofs, particularly involving heritage assets and conservation areas. G5 should be flexible enough to deal with such considerations.
8. In addition, the boundaries used to determine the example figures are not representative of the plot/site boundary and seem to be arbitrary depending on the building, with no surrounding public realm included. By its very nature, surrounding public realm tends to incorporate more hardstanding, which will reduce the deliverable UGF figures. Existing central London projects with terraces, green roofs and extensive landscaping have been found to deliver UGF values of between 0.11 and 0.17, meaning that it would be impossible to meet the policy target of 0.3. If surrounding landscaping in suburban locations is taken into account, the target becomes much more achievable.
9. These concerns were raised in our March 2018 representations and the GLA has not since put forward any further case studies or evidence to justify its approach to the UGF figures of 0.4 and 0.3.
10. G5 should be amended to include a more achievable UGF of 0.2, especially for Inner London sites. Furthermore, this new policy requires clarity and certainty for developers; London First does not agree that boroughs should have the ability to set alternative UGFs. The target should instead be sensitively applied, having regard to context and location of the site, and each application should be considered in terms of the need to balance other policy objectives.

11. G5B currently reads:

- B** *Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.*

12. It should be amended thus:

- B** *Boroughs should sensitively apply the Urban Greening Factor (UGF), having regard to the size and context of the site, and overall nature and benefits of the proposal, to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to site circumstances. The Mayor ~~recommends~~ suggests a target score of 0.2 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development. Where there are particular constraints, such as conservation areas or listed buildings, the Mayor suggests a target score of 0.1 or off-site provision, where justified in exceptional circumstances.*