The Mayor's London Plan

Examination in Public (EIP)

London National Park City Foundation [2065]

Matter M64 and Policies G1, G4 and G5: Green infrastructure and Natural Environment - Green infrastructure, open space and urban greening

29 January 2019

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. Green infrastructure has been debated and explored for some time but the London Plan presents the first real opportunity to be clear about its quality, function and role. As such the Plan can inform good decisions about the different types of green infrastructure and where and how these are applied as part of development and in rectifying harm to habitats and ecosystems. Clarity about this in the London Plan will assist Boroughs in developing suitable local plans and will aid communities in any work they undertake to devise neighbourhood plans. This is especially the case if quality data and evidence about existing ecological status and the potential to address deficits is utilised.

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

2. We endorse these policies which seek to 'green' the urban realm including by ensuring the positive role of new urban development in a variety of ways, including incorporating urban 'greening' into the design, build and ongoing operation of sites, and by the creation and maintenance of new green open space and environmental features, especially in areas of deficiency.

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?

3. Policy GG4 is supported and enhanced by policies G1, G4 and G5 because they help development to incorporate natural features and new urban greening measures such that new housing can "meet high standards of design" and have the "necessary supporting infrastructure", as required by Policy GG4. Similarly, policies G1, G4 and G5 support Policy GG5 in creating the necessary "physical and social infrastructure" and supporting more equitable access to London's diversified economic success which Policy GG5 seeks.

4. London being the world's first National Park City came from Londoners and has so far been supported by over 1,000 Borough ward councillors, by a majority of London

Assembly members, by the Mayor of London, and by a range of professionals across sectors, all of whom see the need to change how cities develop and operate by being better for nature, working with the grain of nature and making more of London's natural, heritage, cultural assets.

5. Visually, London is a very green looking city. Biologically, London has a wealth of wild species and natural features. None of this can be taken for granted and deficits in nature and access to nature exist with consequences for the look, feel and form of London and for public health, well-being and sense of place.

6. Making the majority of London physically 'green' (and blue) is a considerable task. Finding large tracts of green and blue open space for habitats, public access and recreation can help reach the target, but this cannot be counted on. Moreover, sole reliance on large new parks would not necessarily address nature deficits across the rest of the capital and would also do little to ensure that the way development takes place improves. It is likely that a range of approaches will contribute to achieving the 50%+ target, from the use of larger areas to the role of individual new developments and the restoration and retrofitting of existing features and landscapes. For example removing harmful hard surfacing even at a small scale can transform local spaces and places, create linkages and connectivity for people and wildlife alike, and improve the urban realm and urban resilience. The role of public and private space whether larger areas of land / wetland or at the level of individual developments has a role in meeting the National Park City target.

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?

7. There is welcome and rising interest in green infrastructure. To be effective GI must result in more than superficial, visual amenity with landscaped grassy areas and planting that does little or nothing either for biodiversity or for public contact with nature and the outdoors. Properly designed and deployed, 'green infrastructure' can plug nature deficits, help restore environmental conditions and support the functioning of resilient ecosystems. Doing so requires proper use of the data and evidence on habitats, species, the conditions they need to thrive and how to address deficits across the urban landscape. Such evidence should be central to informing how development takes place so that smart assessments are made on matters such as flood risk, nature deficits, lack of access to open space, urban cooling and so on.

8. The emphasis on 'green' infrastructure tends to result in Policy G4, Table 8.1 (Categories of public open space) and Table 8.2 (Urban Greening Factors) overlooking the role of London's rivers, waterways and water bodies as part of the urban realm and how these can be more consciously made part of GI plans.

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

9. We do not regard the All London Green Grid as a substitute for statutory policies on biodiversity, green and open space and green infrastructure by Boroughs in Local Plans, which should draw on a fine degrees of detail about local natural assets and

conditions of species, habitats and environmental features which are likely to be beyond the scope of the strategic framework envisaged for the ALGG SPG.

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?

9. GiGL has estimated that only around 17% of London is public open space. Private space cannot be ignored in terms of its role for biodiversity, recreation, food growing and other public goods covered by the Plan. How private development occurs and is managed also has a role in London's National Park City aspirations. The pressure to build presents genuine concerns that land for housing will be over developed leaving little or no provision for access to nature and open space for recreation and learning which all communities should reasonably expect to have on their doorstep.

10. There is tremendous scope to improve how existing spaces and places are designed, managed and maintained to perform a range of useful functions. Across London, even on land which has been developed, there is underused and often poorly deployed space which could be made more multi-functional and productive for open space, food growing, nature conservation, rainwater capture and more.

11. Table 8.1 sets out a broadly logical categorisation of spaces and the broad roles these play. What the categorisation does not do in any detail is identify how well different types of open space are performing. For example, what is the role of small open spaces for restoring biodiversity and / or for sustainable urban drainage? Are enough being planned as development takes place or are these being squeezed out as land is taken for housing and other development? Knowledge of how different types of spaces and GI assets are functioning matters because without clarity about how they are performing the London Plan cannot adequately track, assess and respond to matters it seeks to address, such as health and resilience.

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?

10. The measures contained in the Urban Greening Factor are the kind of measures which the development sector should be able to incorporate as standard to their plans as part of ensuring schemes meet London's needs, and the Plan provides a useful lead to Boroughs in ensuring this occurs.

11. The retention of existing green cover (especially if it is well established) as described in Policy G5 BA is important because not all green infrastructure can or should be artificial. Table 8.2 covers many different features not all of which will be publicly accessible and this may be a consideration for the way features are scored.