

***Green infrastructure, open space and urban greening***

***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?***

“There is sufficient evidence of the benefits of GI in addressing environmental problems to warrant large scale planning implementation” so concludes a review of evidence of GI for London<sup>1</sup>. There is a general alignment in goals across the draft London Plan and the London Environmental Strategy to control climate-change emissions, urban heat island effect, to promote biodiversity conservation, sustainable drainage, recognising deficiency of quantity and quality of green spaces and green infrastructure in London. Although few of these goals are referenced in GG3 and some more in GG6, the homes that Londoners need and a good economy cannot be achieved in a sustainable and cost effective way without proactively tackling these fundamental issues. A useful discussion of the economic costs and positive economic benefits of GI can be found in the UCL evidence review<sup>2</sup>.

The statutory purpose of planning is to achieve sustainable development and the internationally agreed principle stresses that we achieve our goals of living within environmental limits and a just society by means of a sustainable economy, good governance and sound science. Therefore, the homes that are needed should be situated within areas of, for example, open spaces and green features; and a good economy is one, among other things, that is resilient, where environmental challenges are addressed.

Whether Policies G1, G4 and G5 are fit for purpose is discussed under the following sub-questions.

***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?***

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<sup>1</sup> UCL’s ‘Green Infrastructure for London: a Review of the Evidence’ 2018 (p46)  
<https://www.ucl.ac.uk/engineering-exchange/sites/engineering-exchange/files/ucl-green-infrastructure-for-london.pdf>

<sup>2</sup> Op cit (p38)

***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?***

Mayor's target to achieve more than 50% green cover in London by 2050 does not consider blue spaces by reference to the Glossary definition of 'green cover'. However, the policies in Chapter 8 are skewed towards a focus on green spaces and do not provide a clear framework lacking as they do clear definitions; and as a result, leave too much room for wide interpretation. There is a lack of emphasis on the role of waterways (blue space) in addressing biodiversity conservation, sustainable drainage, deficiency of quantity and quality of green infrastructure in London and this is likely to impede progress to the achievement of the Mayor's greening target. In any event the target should have an implementation 'road map' with interim targets that are shorter term and realistic.

The approach embodied within the campaign to declare London as a National Park city is one where the city and people are intrinsically connected with nature and the outdoors by harnessing the involvement of communities to make London a greener, healthier and fairer place to be in. This help would remedy the profound disconnection from nature that is the lived experience many Londoners, one which can result in apathy towards wider environmental issues<sup>3</sup> which need to be resolved.

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

It is generally necessary for boroughs to prepare GI strategies, but the wording of Policy G1 B should make clear that the strategies include identification of opportunities for collaboration rather than seeming to be their only purpose. That boroughs prepare GI strategies lays down a useful marker that GI, green and open spaces in particular, need to be valued in decision making. NPPF para 73 requires assessments that identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required. However, NPPF had cancelled Planning Policy Guidance (PPG) 17: Planning for Open Space, Sport and Recreation which had contained detailed guidance on preparing such assessments. But the Mayor commits to reviewing the All London Green Grid, which dates from March 2012, to provide pan London guidance on preparing GI strategies (para 8.1.3) thereby filling a gap in detailed up to date guidance which will reduce unnecessary duplication of effort among the boroughs .

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<sup>3</sup> Op cit (p25)

***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?***

Housing estates can contain green and garden and play spaces that are valued by the residents and which contribute to the amenity and natural environment of the neighbourhood. They are literally on the 'doorstep' of homes and can provide an immediate opportunity for play and recreation for those least able to travel greater distances. These spaces need to be protected and improved as appropriate.

The Policy should say more on improving the quality of existing spaces and access thereto. Table 8.1's accessibility to public open spaces has focussed on distance from homes, failing to consider the importance of the more nuanced aspects of mode/nature/ease/safety of accessibility. These are factors which could impede access for vulnerable groups like children, older people and people with mobility problems. The table should be entitled: 'Green Infrastructure Categorisation' and should also include 'Private green elements' of gardens, hedgerows, trees in order to highlight their contribution towards a green and sustainable city.

Generally Policy G4 falls short of providing protection for local green and open spaces. This is in the face of diminishing local authority resources and their attempts at realising their assets, including by permitting changes of use and development of green and open spaces. For example, the site of former Hendon Football Club on Clitterhouse Playing Fields, that has been excluded from MOL designation for proposed housing.

Clause D should (emphatically) read: "The loss of green and open spaces should be resisted". If there are to be 'exceptions, then the compensatory spaces and facilities should be significantly greater and of better quality. This would need to be demonstrated and supported by the local beneficiaries. Net additions in quantity and quality of green and open spaces are an imperative in the face of London's continuing growth and development pressures. Further guidelines for implementation, monitoring and adherence to policy need to be set out as other legal redresses such as enforcement of covenants prove insufficient.

***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?***

Whilst UGF could be welcomed as an indicator supporting the first part of Policy G5, i.e. G5 A, it does not have the necessary credibility to be expressed as policy as in G5 B and C. There is a lack of clarity in policy G5 on how Boroughs are expected to develop an UGF. While the target scores set out in G5 B seek to propose minimum

standards to manage the urban greening of new developments, no justification is given to how the target scores have been set. There is an apparent high level of mathematical precision, calculating to 2 decimal points. But the basis for the Factors is confined to only one simplified environmental performance measure, namely their potential for rainwater infiltration as a proxy to provide benefits such as improved health, climate change adaptation and biodiversity conservation. Target scores are just blanket absolute values; ones that do not consider/evaluate the progress of Boroughs in contributing to the urban greening of London over time, nor the quality of the greening. Consequently, this Policy greening London is not assured, negating the effectiveness of the Policy.

It has not been adequately demonstrated that the “inclusion of urban greening measures in new development will result in an increase in green cover” (para 8.5.1). Limited research has been conducted into this aspect. Target scores have not been proposed for other types of land-use, e.g. educational, industrial, mixed-use development. Borough planning resources are under strain with little or no capacity to develop their own UGFs and in any event this could produce divergent scoring methodologies complicating, among other things, cross-borough developments. There are technical deficiencies, for example, by failing to consider the density of green infrastructure installed within the planned occupied area as influenced by soil conditions, a reliance on site area based calculations not factoring in the vertical distribution of greenery in high-rise buildings. Existing valued and valuable natural areas could be lost to new development that has achieved the appropriate score. For the 50% green cover to be achieved it is likely that existing developments should be so retrofitted. Indeed, there is a need for a more holistic policy framework to explain and justify how such indicators as UGF can contribute to this overarching goal of making London more than 50% green.