

GLA Planning

# Urban Greening Factor London Plan Guidance

## Consultation summary report

February 2023

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**Greater London Authority**

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## 1. Introduction

On 30 September 2021, the Greater London Authority (GLA) launched a consultation on the Mayor’s draft Urban Greening Factor (UGF) London Plan Guidance (LPG). The consultation closed on 20 December 2021. Three online seminars were held during the consultation, attended by 78 people.

The consultation received 49 written responses, which are summarised in this document. The Mayor would like to thank everyone who took part for engaging with the guidance.

## 2. Who took part?

Through the consultation period there were 78 attendees to virtual events; 3,384 views of a dedicated webpage page on the GLA’s consultation platform; and 49 consultation responses (35 submitted through the online platform, and 14 sent directly via email). Detailed participant data is only available for those that responded to the consultation via the online platform, and represents a small sample of those engaged.

Respondents were asked what type of organisation they represent or whether they were responding as an individual; 23 respondents answered this question.

Respondent type	Number	Percentage
Individual	6	26%
Business	4	18%
Campaign group	4	18%
Community group	1	4%
Government body or agency	1	4%
Local authority outside London	0	0%
London borough	6	26%
Professional body	1	4%
<b>Total</b>	<b>23</b>	

Respondents were also asked equality monitoring information in order to assess how representative survey respondents were, compared to the demographics of Londoners. The number of responses received on those questions was limited and therefore the relevant analysis has not been included in this consultation summary report.

### **Other engagement**

Other engagement was undertaken prior to the formal consultation, including:

- workshops with London boroughs
- workshops with landscape architects and other industry professionals.

Equality monitoring information was not collected for these engagements.

## **3. Consultation feedback and GLA response**

As part of the engagement on the draft guidance, respondents to the formal consultation survey were asked to submit responses to specific questions, which are summarised here. Where numbers of responses are reported, these are responses received through the formal consultation survey; however, comments received by email were also considered, and are included in the analysis for the relevant questions.

This section also includes responses through the **other engagement** channels noted above. However, the key issues that arose from these were also raised in response to the formal consultation survey, and have been included in the analysis of responses.

### **3.1 Overall approach**

**Q1: To what extent do you agree or disagree with the following sentence? ‘The guidance is clear about how to apply the Urban Greening factor (UGF) to development proposals.’**

Thirty-five respondents answered this question. Of these, 77 per cent agreed that the guidance was clear about how to apply the UGF to development proposals; and 12 per cent either somewhat or strongly disagreed.

Response	Number	Percentage
Strongly agree	12	34%
Somewhat agree	15	43%
Neither agree or disagree	4	11%
Somewhat disagree	2	6%
Strongly disagree	2	6%
<b>Total</b>	<b>35</b>	

**Q2: To what extent do you agree or disagree with the following sentence? ‘The guidance is clear about how boroughs should set local UGF targets.’**

Thirty-four respondents answered this question. Of these, 58 per cent agreed that the guidance was clear on how to set local UGF targets and 24 per cent disagreed.

Response	Number	Percentage
Strongly agree	7	20%
Somewhat agree	13	38%
Neither agree or disagree	6	18%
Somewhat disagree	5	15%
Strongly disagree	3	9%
<b>Total</b>	<b>34</b>	

### 3.2 Calculating the UGF

**Q3: The guidance sets out how different greening types (‘surface-cover types’) are measured, weighted and scored in Table 3.1 and in more detail in Appendix Table A1.1. To what extent do you agree or disagree with the following sentence? ‘The guidance on categorising and scoring surface-cover types is clear and easy to use.’**

Thirty-four respondents answered this question. Of these, 67 per cent agreed that the surface-cover types were clear and easy to use and 18 per cent disagreed.

Response	Number	Percentage
Strongly agree	11	32%
Somewhat agree	12	35%
Neither agree or disagree	5	15%
Somewhat disagree	4	12%
Strongly disagree	2	6%
<b>Total</b>	<b>34</b>	

**Q4: Please tell us if you think there are additional surface-cover types that you think should be included in Table A1.1.**

Twenty-two respondents answered this question, and suggested the following:

- The guidance should be clear how rivers, streams, canals and other water bodies are scored.
- The guidance should clarify how blue roofs, brown roofs and scrub are scored.
- ‘Green roof’ should be replaced by ‘living/biodiverse roof’.
- The guidance should disincentivise impermeable surfaces and be clearer on how specific types of paving are scored.
- The UGF should ensure non-native and invasive species are avoided.
- Some specific circumstances and types of greening should have a score of zero (e.g. standard trees in above-ground pots or containers and artificial grass).
- Minimum specifications should be given for soil quality and depth.
- The scores for different types of hedges should be clarified or amended.
- Green walls and green roofs can be expensive to maintain.

**GLA response**

Some of the comments suggested **amendments to the scores for existing greening measures** set out in Table 8.2 of the London Plan. This table sets out broad categories for surface-cover types that remain appropriate. The guidance cannot make amendments to the overall categories and scores in the London Plan.

Some respondents suggested adding **additional layers of detail** or sub-categories to the surface-cover scoring table. While we acknowledge that further layers of detail could make the UGF scores more precise, the UGF is intended to be a flexible tool that is straightforward to use for applicants and planners. Making the surface-cover scoring more complex is likely to make the UGF tool more difficult to implement.

Amendments to the scoring based on **biodiversity value** were proposed by some respondents. While a key aim of the UGF is to deliver gains for biodiversity, this is not the sole function of the policy, which recognises the wider multifunctional role of green infrastructure – such as in supporting sustainable drainage. Changes were also requested to the scoring to promote the retention of **veteran trees**. The UGF works in combination with other London Plan policies such as G6 – Biodiversity and access to nature, and G7 – Trees and woodlands, which set out specific policy requirements on these topics.

There were a number of suggestions relating to **hedges** in terms of measurement and scoring. It is considered that it would be overly complex to include sub-categories of hedges as part of this guidance, so no amendments have been made. There were also comments relating to the use of **invasive species**. The UGF is a flexible tool that does not incorporate information on species selection. Proposals should follow existing legal requirements, local policies and best practice relating to the planting of invasive species. To make clear how **bodies of water** should be scored, Table A1.1 has been amended to clarify that this should include rivers, canals and streams. **Scrub** has also been included in the table. **Artificial grass** has been included to confirm that this should receive a zero score. Additional text has been added to table A1.1 to clarify that **brown roofs** should be scored according to substrate depth as per green roofs.

In circumstances where trees and other planting are included above **basements and underground structures**, the guidance has been amended to clarify that where this is at ground level, the relevant UGF score should be given for each type of planting (i.e. each corresponding surface type in the UGF table), rather than an overall green roof score.

**Q5: The guidance sets out how to submit and assess UGF scores for a development site as part of a planning application. To what extent do you agree or disagree that ‘the information applicants are required to submit on the UGF will allow applicants and planners to accurately assess and verify UGF scores’?**

Thirty-four respondents answered this question. Of these, 58 per cent agreed that the information required would allow applicants and planners to accurately assess and verify UGF scores, and 18 per cent disagreed.

Response	Number	Percentage
Strongly agree	10	29%
Somewhat agree	10	29%
Neither agree or disagree	8	24%
Somewhat disagree	4	12%
Strongly disagree	2	6%
<b>Total</b>	<b>34</b>	

**Q6: The guidance sets out how to submit and assess UGF scores for a development site as part of a planning application. Please tell us if you have any comments on the UGF assessment and verification process.**

Twenty-nine respondents answered this question, and suggested the following:

- Further detail on the verification of UGF scores is required.
- A more detailed calculation table should be provided to identify and verify each individual area of planting.
- More guidance should be given on how to weigh up greening choices against other policy aims and constraints.
- Further clarity is needed on how the UGF is calculated for phased developments.
- The guidance should explain how adopted roads and other land not under control of the applicant within a site area should be accounted for in calculations.
- Clarity is needed on how the maturity of planting is captured in the calculations.
- Further information on whether greening measures must always be within the red line of a site is required.

**GLA response**

The guidance has been amended to include additional detail on **verifying information** submitted as part of a planning application.

It is not considered appropriate to make the **reporting of scores for areas of planting more complex**, as this level of detail will be disproportionate for most applications. However, the guidance has been updated to note that the local planning authority may request further detailed information, where necessary to

clarify or verify proposed greening measures, e.g in the case of **large or more complex masterplans**.

The guidance has been amended to clarify how **roads and other similar land within the red line boundary** should be factored into calculations.

For **phased developments**, the guidance has been amended to provide further flexibility to achieve optimum greening across the site as a whole.

Further clarity on how the UGF scores for green measures account for the **maturity of planting** has been added to the guidance.

The intention of the UGF is for greening measures to be delivered as an integrated part of development and so should be delivered on site. However, there may be limited circumstances where some **off-site provision** is acceptable. The guidance has been amended to make clear that it is for boroughs to determine if this approach is appropriate, while being clear that this should be the exception and robustly justified.

### 3.3 Development of borough targets

**Q7: The guidance sets out how to define a green infrastructure baseline and identify greening priorities in a borough. Please tell us if you have any comments on establishing a green infrastructure baseline and identifying borough priorities.**

Twenty-seven respondents answered this question, and suggested the following:

- The relationship between the UGF, Green Infrastructure Strategies and forthcoming Local Nature Recovery Strategies (LNRS) and other related borough plans such as tree strategies be made clearer.
- Boroughs do not have sufficient resource and expertise to develop and enforce local UGF targets.
- Further guidance is needed on the use of offset payments and links to other sources of funding.
- The UGF should include mechanisms for recording biodiversity gain, contributions to canopy cover and more detail on soil quality.
- The guidance does not take into account the specific circumstances of boroughs which may constrain the amount of green infrastructure that can be delivered.

#### GLA response

The guidance has been updated to include further text on how the **UGF relates to green infrastructure strategies and LNRS**, and how it can be used by boroughs as

**part of a suite of tools to promote nature recovery and enhance biodiversity.** References have been added to additional plans, strategies and data sources that may be useful in setting local UGF targets

It is recognised that **resources** for green infrastructure will vary from borough to borough. The London Plan provides a target that can be applied directly to major development schemes where a borough has not developed a local target. It has been made clearer in the guidance that boroughs can determine whether it is appropriate to **continue to apply the London Plan targets** or to pursue a more specifically tailored local target. We will continue to offer support to boroughs through the guidance itself, and through training and workshop sessions for borough officers.

While some responses suggested adding further detail (e.g. in relation to biodiversity, canopy cover and soil quality), the UGF is intended as a simple tool to improve the quality and quantity of green infrastructure; and works **alongside other policy** measures (e.g. Policy G6 – biodiversity and access to nature) which have more specific aims. Introducing additional detailed elements would make the UGF disproportionately more complex to implement, compared with the additional benefits added detail would give.

**Q8: The guidance sets out different approaches for boroughs to consider when setting a local UGF target. Please tell us if you have any comments on setting borough UGF targets, or if there are other options that should be included.**

Twenty-two respondents answered this question, and suggested the following:

- The UGF should take account of existing green space provision and its access and capacity issues.
- There should be clarification on how often the UGF policy will be reviewed and how planning reform proposals will impact the UGF.
- Boroughs should only be able to set higher UGF scores than those set out in the London Plan; and conversely, boroughs should only be able to set standards lower than those in the London Plan.
- The GLA should provide further guidance about a threshold for applying the UGF to smaller-scale developments.
- Boroughs with different UGF targets will create complexity for developers working across different boroughs, and they should not set their own standards.
- There should be further detail on the methodology used to derive the London Plan targets.
- The guidance is too brief on methodology for setting targets for different locations.

## GLA response

The **UGF sits alongside other London Plan policies** and guidance that must also be considered in setting local targets in Local Plans, and in applying the UGF to development proposals. It is not considered necessary to extend the scope of the UGF, as related matters raised by respondents are covered by other policies and guidance such as Policy G1 – Green Infrastructure; forthcoming guidance on Green Infrastructure Strategies; and Policy G6 – Biodiversity and access to nature.

The targets set in the London Plan are considered to be broadly achievable across London. There may be specific circumstances for some areas where a higher or lower target is appropriate. Boroughs will be expected to use **relevant evidence to support local targets** as part of the normal Local Plan development and Examination process.

London Plan Policy G5 sets out how the UGF should be applied to major developments. Boroughs are encouraged to explore how the principles of the UGF can be applied to **other scales of development**. Some additional examples have been added to this section and reference to the **evidence base for the London Plan targets** has been included. It will be for individual boroughs to determine appropriate thresholds if they wish to apply the UGF to developments below the major threshold set out in the London Plan.

While it is appreciated that varying targets across different boroughs will be less simple for developers operating in different boroughs to apply, this is considered necessary to allow for **local circumstances and opportunities** to be captured and realised. The guidance is clear that the **methodology and the weighting scores for greening measures** should be in line with those set out in the London Plan and guidance to ensure consistency in the overall approach across London.

Any review of the current targets and weighting scores set in Policy G5 would be through a future revision to, or replacement of, the London Plan. At this stage, the outcomes of any proposed **reforms to the planning system** are unknown; however, it is likely that the UGF will remain a useful tool for delivering greening that is compatible with design codes and with nationally mandated Biodiversity Net Gain.

## 3.4 Further comments

### Q9: Do you have any further comments to make on the guidance?

Thirty-eight respondents answered this question, and suggested the following:

- It would be better to use the UGF alongside the proposed Green Infrastructure Strategies guidance.
- Monitoring information on how the UGF has already been applied to schemes would be useful to understand the impact it is having, and how this information will be shared and used to inform revisions to future policy (including the London Development Database, use of section 106 for monitoring).

- There is a weakness in enforcement and maintenance of green infrastructure features (including how long features should be retained, use of section 106).
- The UGF is seen as tick-box exercise.
- The guidance should be clearer on the relationship between the UGF and Biodiversity Net Gain.
- There should be further guidance on how to balance greening needs with other policy aims and requirements.
- TfL should improve on delivering greening.
- There is uncertainty on how local UGF targets will be scrutinised.
- Targets should be more ambitious to tackle the climate emergency.
- The targets should be applied flexibly, as target scores are unachievable on some sites.
- The greening measures encouraged by the UGF do not provide ground-level open space and play facilities
- Offsite payments where UGF targets have not been achieved should not be acceptable.
- The guidance is helpful in setting out how to apply the UGF to planning proposals, and how councils should approach a green infrastructure baseline, but further guidance should be provided on setting local scores.
- There are concerns about deliverability due to borough resources and capacity.
- The UGF scoring should reflect heritage concerns and historic landscapes.
- Clarity is needed on how building regulations and guidance relate to fire impact on greening measures.

### GLA response

A significant number of comments in this section of the questionnaire related to topics covered in other questions. These comments have been included in the analysis for the relevant topic in this document.

A number of the points raised in this part of the consultation relate to matters that are beyond the scope of the UGF guidance; many are more relevant to **green infrastructure strategies**. Relevant comments raised in response to this consultation will be used to inform future guidance planned on preparing these strategies.

Further comments were made that requested **changes to elements of policy G5 in the London Plan**. Guidance cannot make changes to the London Plan policy, which would only happen through an update or replacement to the London Plan. Proposed local targets will be reviewed by the Mayor as part of the **Local Plan general conformity** with the London Plan process.

The guidance has been amended to emphasise that **greening should be a fundamental element of site design** and considered early in the design process. A new section has been added to the guidance on providing advice in circumstances where **UGF targets are not met on-site**.

Minor amendments have been made to clarify how UGF scores are recorded in the **Planning Datahub**.

Additional text has been included in the guidance on securing greening measures, and on ongoing **maintenance and monitoring**.

The relationship between **UGF and Biodiversity Net Gain requirements** has been clarified.

### 3. Equality impacts

As part of the consultation, a draft Equality Impact Assessment (EqIA) was undertaken, which did not identify any negative equality impacts on protected groups. Questions relating to the EqIA were included in the UGF survey and were consulted on as part of the overall consultation on the draft guidance.

Four responses were received to the EqIA survey on the draft UGF guidance.

Respondents raised the following potential equality impacts arising in relation to the draft guidance:

- All urban greening elements added must be accessible for people with disabilities and those who use mobility devices.
- There is a need for all greening to create environments where women and girls feel safe when outside.

A further EqIA of the changes made to the guidance resulting from the consultation did not identify any negative equality impacts on protected groups.

#### GLA response

Both potential equality impacts raised in response to the draft UGF guidance had been identified during the draft EqIA, and mitigating actions were set out to maximise the positive overall impact of greening on these protected groups. The UGF works alongside other policies, such as those requiring the provision of accessible amenity

space, to ensure that the planning process contributes to providing green environments that are accessible.

Creating green spaces within developments that are welcoming and well maintained is likely to have a positive impact for women and girls, supporting their right to safety, both actual and perceived, in these spaces. Greening of spaces as part of meeting UGF requirements will be integrated into the development and will generally be at a smaller scale than traditional open spaces. This can provide opportunities to interact with nature in a way that feels safe, and may be of particular benefit to women and girls.

#### **4. Next steps and monitoring**

We would like to thank everyone who took the time to contribute to the development of the UGF guidance and engage with the consultation. All views that were shared with us have been considered in the development of the final UGF guidance document, and we have aimed to summarise the key points raised in this report.

For the latest information on the UGF guidance and the UGF calculator please visit the GLA's [UGF webpage](#). For any queries please email: [urbangreeningfactorlpg@london.gov.uk](mailto:urbangreeningfactorlpg@london.gov.uk).

## Appendix 1 Summary of engagement

### Informal and/or early engagement

Activity type	Participation
Workshops, seminars and training sessions	Industry professionals including borough officers and councillors; the Landscape Institute; the Chartered Institute of Ecology and Environmental Management; Urban Design London; Public Practice; University College London

### Formal engagement

Date	Activity type	Participation	Representation
30 September 2021 – 20 December 2021	Consultation survey and written responses	All	49 responses
19 October 2021	Webinar – Introducing the UGF	All	12 attendees
4 November 2021	Webinar – Applying the UGF to development proposals	All	26 attendees
16 November 2021	Webinar – Applying the UGF for local planning authorities	London boroughs	40 attendees

