

London national Park City Foundation comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

London National Park City Foundation (LNPCF)

Response to the Mayor of London's draft London Plan, 2 March 2018

Introduction

The London National Park City Foundation (LNPCF) is the Charitable Foundation set up to advance the establishment and development of London as a National Park City. We are pleased to submit our response to the Mayor's draft London Plan.

In keeping with our positive view of London as a National Park City the Plan and the Mayor's Housing and Environment strategies present the opportunity to make far better use of spaces across the capital, in and around existing development by increasing the quality of land use. More active use of space in and around development can help advance and integrate the Mayor's aims on nature and biodiversity, on inclusive neighbourhoods, skills and containment of London in relation to the wider south east region.

We trust this consultation response is helpful.

Questions about this submission should be sent to: Paul de Zylva paul.dezylva@nationalparkcity.org

Summary

The draft London Plan:

- Is quite strong on protecting London's existing Green Belt and Metropolitan Open and (MOL) as part of containing London's growth;

- Has as a good new planning policy that “Local green and open spaces should be protected”;
- Addresses the suggestion that the Green Belt should be developed because is not always very ‘green’. The draft Plan contains a potentially useful policy to address where Green Belt which is not as nature-rich as it could be, for whatever reason (neglect, etc) and can be improved for nature, access and more;
- Seeks to mix up development for multi-functionality so that more is gained from the way land is used;
- Also contains a potentially good policy to address locations where there may be deficiencies in the amount / quality of green space local areas;
- Proposes a new ‘Urban Greening Factor’ with a formula for deciding how much green roofing, planting, etc is needed in new major developments. This may prove useful in providing more certainty about how each major development is adopting proper green measures as standard;
- Seeks to implement action on carbon and its trenchant symptom: London’s persistently poor air, including via ‘Healthy Streets’ policies;
- Contains some potentially useful policies on play and recreation;
- Has potentially other good policies on trees and increasing tree cover

However:

- It is unclear whether the proposed green belt and MOL policies will address councils allowing such designated land to be built / encroached on such as in Hounslow;
- The question remains how much remaining local green spaces, often in areas of nature deficit, will come under pressure to intensify as a result of Plan policies;
- The draft Plan is too vague on outdoor spaces in relation to housing, new development and town centres and urban greening in relation to the wider public realm;
- The Plan needs to be clearer about how development and regeneration will actively contribute to restoring nature, ensuring quality provision of green open space and other ‘social infrastructure’ based on data and metrics such as from the All London Green Grid, GIGL and public health and nature deficiencies;
- The draft Plan is vague and weak on waterways and rivers, as though they are somehow separate from green infrastructure, and by including reference to the under-resourced London Rivers Action Plan without seeking to address how the Plan can support that action plan.

Specific comments and observations

Foreword

The London National Park City Foundation (LNPCF) supports the Mayor's intention in his Foreword:

- Page xiii: “This new London Plan marks a break with previous London Plans, represents a step-change in our approach and serves as a blueprint for the future development and sustainable, inclusive growth of our city.”
- Page xiv: “We let down future generations if we do not properly plan for accommodating growth in a way which is environmentally, economically and socially sustainable.
- “So this London Plan sets out a new way of doing things, something I am calling Good Growth. Good Growth is about working to re-balance development in London towards more genuinely affordable homes for working Londoners to buy and rent. And it's about delivering a more socially integrated and sustainable city, where people have more of a say and growth brings the best out of existing places while providing new opportunities to communities.
- “Good Growth is not about supporting growth at any cost, which for too long has been the priority, leaving many Londoners feeling excluded and contributing to a lack of community cohesion and social integration.”
- Pages xv and xvi: “...And a city where access to great culture is built into the fabric of every part of London, with our rich heritage and cultural offer supporting our growing world-class creative industries.”

“I also see the London Plan revolutionising the way we get around our city - enabling a boom in active travel, with walking and cycling becoming the primary, default choice for millions of Londoners because we have made it far easier and safer. I envisage London as a greener city, with high quality open spaces, parks and commons, and one where we lead the way in tackling climate change by moving towards a zero-carbon city by 2050. And when I look to the future, I see London as a city with clean air for our children to breathe...”

Building strong and inclusive communities – Policy GG1, Page 13

LNPCF supports Policy GG1 to:

B - Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.

C - Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish.

D - Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.

E - Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.

Making the best use of land – Policy GG2, Pages 14 - 16

LNPCF supports the intention to:

1.2.1 This rapid growth will bring many opportunities, but it will also lead to increasing and competing pressures on the use of space. To accommodate growth while protecting the Green Belt, and for this growth to happen in a way that improves the lives of existing and new Londoners, this Plan proposes more efficient uses of the city’s land.

1.2.2 The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space efficiently, but also better for the people who use them. This will mean creating places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses, and co-locating different uses to provide communities with a wider range of services and amenities.

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 50 per cent green cover across London, will be important to help London become a National Park City.

1.2.7 London's distinctive character and heritage is why many people want to come to the city. As new developments are designed, the special features that Londoners value about a place, such as cultural, historic or natural elements, can be used positively to guide and stimulate growth, and create distinctive, attractive and cherished places.

Policy GG2

LNPCF supports Policy GG2:

To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:

- A. Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.
- B. Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach.
- C. Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.
- D. Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.

E. Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth.

F. Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.

Creating a healthy city - Pages 16 - 17

LNPCF supports the intention to:

1.3.1 The health of Londoners is, to a large extent, determined by the environment in which they live. Transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by the planning system, and local authorities are accordingly responsible for planning and public health.

1.3.2 The scale of London's health inequalities is great, and the need to reduce them is urgent. Healthy life expectancy is lower in more deprived areas, and the differences between parts of London is stark – more than 15 years for men and almost 19 years for women. London's ongoing growth provides an opportunity to reduce these inequalities, and delivering Good Growth will involve prioritising health in all London's planning decisions.

1.3.3 The causes of London's health problems are wide-ranging. Many of London's major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access varies widely across the city. Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts. A healthy food environment and access to healthy food is vital for good health. Good planning can help address all of these issues.

1.3.4 The Healthy Streets Approach outlined in this plan puts improving health and reducing health inequalities at the heart of planning London's public space. It will tackle London's inactivity crisis, improve air quality and reduce the other health impacts of living in a car-dominated city by planning street networks that work well for people on foot and on bikes, and providing public transport networks that are attractive alternatives to car use. It will also ensure that streets become more social spaces.

LNPCF supports Policy GG3:

To improve Londoners' health and reduce health inequalities, those involved in planning and development must:

1. Ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.
2. Promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices.
3. Use the Healthy Streets Approach to prioritise health in all planning decisions.
4. Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments.
5. Plan for improved access to green spaces and the provision of new green infrastructure.
6. Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold.
7. Seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.

Delivering the homes Londoners need - Policy GG4, Page 19 - 20

LNPCF PROPOSAL: Policy GG4 does not address housing's outdoor surroundings apart from perhaps in a highly condensed way in part D of the policy:

"Identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset."

Policy GG4 and its supporting text (see below) should expressly mention the need for quality open space for play, recreation and other access as a break from built development.

1.4.9 The things that make London's economy so strong are the same things that make London an attractive and exciting place to live, work and visit. London's ethos of tolerance and respect, its rich cultural and historic assets, the quality of its streets and public places, its spirit of creativity and entrepreneurialism – these things attract businesses of all sizes and allow them to develop and thrive. The people who these businesses employ need strong communities, pleasant environments that promote good health, and good quality, affordable homes in places they want to live. The continuing success of London's economy is reliant upon making the city work better for everyone.

1.4.11 The right infrastructure is also required to help businesses succeed across London. The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processes, opening up new markets and allowing more flexible working. Convenient transport connections and street, rail and waterway networks that allow the efficient movement of goods and people are also vital, alongside the schools, healthcare facilities and other amenities that employees need to be healthy and productive.

Growing a good economy - Policy GG5, Page 21

LNPCF PROPOSAL: LNPCF finds that Policy GG5 does not explicitly cover nature and quality green and natural space and that either parts D and F of the policy should be strengthened and made more explicit to mention the need for quality green open space for a range of reasons, or that a new part G should capture this:

CURRENT TEXT:

To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

1. Promote the strength and potential of the wider city region.
2. Seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London.
3. Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.
4. Ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth.
5. Ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning.
6. Promote and support London's rich heritage and cultural assets, and its role as a 24-hour city.

LNPCF PROPOSES ADDING:

1. Ensure development and regeneration provides quality green open space for play, recreation and other access as a break from built development and to ensure all schemes play an active role in restoring nature, public health and London's resilience.

LNPCF supports the intention of the supporting paragraphs on page 27:

2.0.2 London's green and open spaces are a vital part of the capital. Its parks, rivers and green open spaces are some of the places that people most cherish and they bring the benefits of the natural environment within reach of Londoners. London's Green Belt and Metropolitan Open Land designations (see Chapter 8) serve to protect these strategically important open spaces, prevent urban sprawl and focus investment and development on previously developed land.

2.0.4 ... proper planning of utilities and communications capacity and the social infrastructure that supports the day-to-day lives of Londoners, well in advance of new development. Opportunity Area Planning Frameworks and Local Plans should have clear strategies for their delivery.

The Central Activities Zone (CAZ) - Policy SD4, Page 66 - 69

LNPCF supports the intention to:

2.4.7 The distinct environment and heritage of the CAZ should be sustained and enhanced through development decisions, Local Plans and other initiatives such as the transformation of Oxford Street. This should recognise both its strategic elements, including the River Thames, the Royal Parks, World Heritage Sites, Designated Views and unique concentration of heritage assets, as well as more local features including the public realm, smaller waterways and green and open spaces.

2.4.8 Air quality in the CAZ is particularly poor due to the intensity of the road network and land uses. The CAZ also experiences high levels of construction which results in dust and emissions from construction activities and equipment that adversely affect air quality. The Mayor is taking practical steps to improve air quality in the CAZ including the T-charge and stricter Ultra-Low Emission Zone which will impose charges on the most polluting vehicles.

Town centres - Policy SD6, Pages 78 - 79

LNPCF PROPOSAL: LNPCF finds that Policy SD6 overlooks quality urban greening of high biodiversity value and it is not explicit from the text below that these will be covered by Policy SD6's use of the term 'social infrastructure':

1. London's varied town centres and their vitality and viability should be promoted and enhanced as:

- 1) strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development
- 2) locations for mixed-use or housing-led intensification and higher-density renewal, securing a high-quality environment and complementing local character and heritage assets...(and)
- 6) a key mechanism for building sustainable, healthy, walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management.

LNPCF notes that 'social infrastructure' is defined on page 202 as follows:

5.1.1 Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes health provision, education, community, play, youth, recreation, sports, faith, and emergency facilities.

We also note that Green infrastructure in all its forms is also a key component of social infrastructure, and is addressed separately in Chapter 8, Policy G3 Metropolitan Open Land and Policy G4 Local green and open space.

Town centre network - Policy SD7, Pages 81 and 82

LNPCF PROPOSAL: LNPCF finds the same for Policy SD7 as for Policy SD6 above.

Strategic and local regeneration, Page 94

LNPCF supports the stated intentions:

2.10.6 The Areas for Regeneration are home to many established and varied communities, and there is likely to be a strong sense of place, local identity, and character that is reflected in the buildings, streets and spaces in the area, the lives of the people that live there and the activities that take place. Local Plans, Opportunity Area Planning Frameworks, and regeneration strategies should identify, protect and promote the places and spaces that are particularly valued by local communities, including cultural venues, heritage assets, community facilities and social infrastructure, as well as creating new spaces for people to enjoy.

LNPCF PROPOSAL: LNPCF proposes that enjoyment is subjective whereas policies which are playing a role in restoring high quality nature are not, and should be part of this policy.

Design: London's form and characteristics - Policy D1, Pages 98 - 100

LNPCF PROPOSAL: LNPCF finds that Policy D1 and its supporting text is too general in overlooking the need for spaces and development to actively contribute to restoring high quality nature.

CURRENT TEXT:

B Development design should:...

- 3) aim for high sustainability standards
- 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character
- 5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water
- 6) achieve comfortable and inviting environments both inside and outside buildings.

3.1.4 Maximising urban greening and creating green open spaces provides attractive places for Londoners to relax and play, and helps make the city more resilient to the effects of climate change. Landscaping and urban greening should be designed to ecologically enhance and, where possible, physically connect, existing parks and open spaces.

LNPCF PROPOSAL: Policy D1 and supporting text must relate and gear urban greening and landscaping to precise needs to restore nature, increase public contact with nature, and access to open space for play, recreation and learning, and build resilience. Such needs can be informed by metrics such as data on nature deficits and public health data and information from the All London Green Grid and GIGL.

Communal play space for children and young people, Page 113

LNPCF supports the intention:

3.4.7 Communal play space for children and young people should be provided in developments with an estimated occupancy of ten children or more in accordance with the requirement of Policy S4 Play and informal recreation.

Public realm - Policy D7, Page 122

LNPCF PROPOSAL: Policy D7 mentions urban greening but not particularly convincingly such that public realm will activity contribute to restoring urban nature rather than the current common approach to the installation of trees in concrete or tubs and planting of low nature value. Key sections of the current text are:

H Incorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity.

I Ensure that shade and shelter are provided with appropriate types and amounts of seating to encourage people to spend time in a place, where appropriate. This should be done in conjunction with the removal of any unnecessary or dysfunctional clutter or street furniture to ensure the function of the space and pedestrian amenity is improved. Applications which seek to introduce unnecessary street furniture should normally be refused.

J Explore opportunities for innovative approaches to improving the public realm such as open street events.

K Create an engaging public realm for people of all ages, with opportunities for formal and informal play and social activities during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm.

L Ensure that on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Pedestrian crossings should be regular, convenient and accessible.

Education and childcare facilities - Policy S3, Page 208

B 8) ensure that facilities incorporate suitable, accessible outdoor space

9) locate facilities next to parks or green spaces, where possible

10) ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.

LNPCF PROPOSAL: LNPCF finds that this policy (parts B 8, 9 and 10) referring to school open space and access provides a get-out clause to remove space if this can be justified, which is highly likely. The supporting paragraph on page 211 should be made part of *Policy S3* with more enthusiasm:

Where possible, natural features such as trees, greenery and spaces for food growing should be incorporated into playgrounds and school sites, recognising both the health and educational benefits these can provide. Healthy and safe routes to education and childcare facilities, should be considered through the design process.

Play and informal recreation - Policy S4

LNPCF PROPOSAL: LNPCF find that the policy and supporting text underplay the role of natural play and lack strength in how this is part and parcel of play, of being outdoors and of informal and formal learning and recreation.

A. Boroughs should:

1) undertake audits of existing play and informal recreation provision and opportunities, and assessments of need, considering the quantity, quality and accessibility of provision

2) produce strategies on play and informal recreation facilities and opportunities, supported by Development Plan policies, to address identified needs.

B Development proposals for schemes that are likely to be used by children and young people should:

- 1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile
 - 2) for residential developments, incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that:
 - a) provides a stimulating environment
 - b) can be accessed safely from the street by children and young people independently
 - c) forms an integral part of the surrounding neighbourhood
 - d) incorporates trees and/or other forms of greenery.
 - 3) incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently
 - 4) for large-scale public realm developments, incorporate incidental play space to make the space more playable
 - 5) not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.
- 4) mobile within their neighbourhood, is important for children and young people's wellbeing and development.

5.4.2 Many children and young people, however, find that there are limited opportunities for them to play in their local neighbourhood. This is often not because of a lack of formal play provision, but due to restrictive street design and layouts, poor links between spaces for play and recreation, and the threat of busy roads and traffic. Developments should encourage children and young people to move around freely through safe streets and footpath networks that connect to more formal play provision, green spaces and parks, and that follow the Healthy Streets Approach.

5.4.3 Where formal play provision is provided in new developments, it should be free, well-designed, accessible, inclusive and stimulating. It should integrate into the wider network of public open spaces and not be severed from the rest of a neighbourhood by physical barriers such as main roads. Play provision should be overlooked in some way to allow for a level of informal community supervision and generate a sense of safety and security. Integrating natural environments into play provision is encouraged, acknowledging the benefits to learning, and to help to support a green infrastructure network across the city.

5.4.4 There should be appropriate provision for different age groups, including older children and teenagers. Particular consideration should be given to consultation with children and young people in the design of new provision to understand their changing needs. The needs of parents and carers should also be considered in the design of these spaces. Appropriate arrangements for management and maintenance of play and communal facilities should be provided. Youth facilities for young people should also be incorporated where possible to ensure that young people have suitable spaces to meet and play and feel welcome and included in developments and the public realm.

5.4.5 Formal play provision should normally be made on-site and in accordance with Development Plans' play policies for the area, using a benchmark of 10 square metres per child as a basis for assessing future requirements arising from a projected increase in the child population of the area. Supplementary Planning Guidance will provide additional detail on the application of this benchmark and other implementation issues. Where development is to be phased, there should be an early implementation of play space.

5.4.6 Off-site provision, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents. This is likely to be more appropriate for the provision of play facilities for older children, who can travel further to access it, but should still usually be within 400 metres of the development and be accessible via a safe route from children's homes. Schools, school playing fields and other facilities can also provide an important contribution to play and informal recreation facilities and should be encouraged to allow community access to facilities out of hours.

5.4.7 Through the development of play strategies, boroughs should ensure the integration of play provision and child-friendly neighbourhoods into other borough strategies.

Heritage conservation and growth - Policy HC1, Pages 268 - 269

LNPCF supports Policy HC1:

7.1.1 London's historic environment, represented in its built form, landscape heritage and archaeology, provides a depth of character that benefits the city's economy, culture and quality of life. The built environment, combined with its historic landscapes, provides a unique sense of place, whilst layers of architectural history provide an environment that is of local, national and international value. London's heritage assets and historic environment are irreplaceable and an essential part of what makes London a vibrant and successful city, and their effective management is a fundamental component of achieving good growth.

7.1.2 London's diverse range of designated and non-designated heritage assets contributes to its status as a world-class city. Designated assets currently include four World Heritage Sites, over 1,000 conservation areas, 19,000 list entries for historic buildings, 150 registered parks and gardens, 160 scheduled monuments, and one battlefield. Non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows and ancient woodlands.

7.5.1 London's rich cultural offer includes visual and performing arts, music, spectator sports, festivals and carnivals, pop-ups and street markets, and a diverse and innovative food scene, which is important for London's cultural tourism. The capital's cultural offer is often informed, supported and influenced by the work of the creative industries such as advertising, architecture, design, fashion, publishing, television, video games, radio and film. Cultural facilities and venues include premises for cultural production and consumption such as performing and visual arts studios, creative industries workspace, museums, theatres, cinemas, libraries, and music and other entertainment venues, including pubs and night clubs. Although primarily serving other functions, the public realm, parks, skate-parks and sports venues can provide important settings for a wide range of arts and cultural activities.

Green infrastructure - Policy G1, Pages 302

LNPCF supports Policy G1:

- A. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.
- B. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.
- C. Development Plans and Opportunity Area Planning Frameworks should: 1) identify key green infrastructure assets, their function and their potential function 2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

Supporting text:

8.1.1 A green infrastructure approach recognises that the network of green spaces, street trees, green roofs and other major assets such as natural or semi-natural drainage features must be planned, designed and managed in a more integrated way to meet multiple objectives including: promoting mental and physical health and wellbeing; adapting to the impacts of climate change; improving air and water quality; encouraging walking and cycling; and conserving and enhancing biodiversity and ecological resilience alongside more traditional functions of green space such as play, sport and recreation.

8.1.2 All development takes place within a wider environment and green infrastructure should be seen as an integral element and not as an 'add on'. It's economic and social value has become increasingly evident across all of London at all scales and has been highlighted in the London i-Tree Assessment and the Natural Capital Account for London's Public Parks.

8.1.3 To help deliver on his manifesto commitment to make London at least 50 per cent green by 2050, the Mayor will review and update existing Supplementary Planning Guidance on the All London Green Grid – London's strategic green infrastructure framework - to provide guidance on the strategic green infrastructure network and the preparation of green infrastructure strategies.

London's Green Belt - Policy G2, Page 303

LNPCF supports Policy G2:

A. The Green Belt should be protected from inappropriate development: 1) development proposals that would harm the Green Belt should be refused 2) the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported.

B. The extension of the Green Belt will be supported, where appropriate. It's *(sic)* de-designation will not.

Supporting text:

8.2.1 The Mayor strongly supports the continued protection of London's Green Belt. The NPPF provides a clear direction for the management of development within the Green Belt and sets out the processes and considerations for defining Green Belt boundaries. London's Green Belt makes up 22 per cent of London's land area and performs multiple beneficial functions for London, such as combating the urban heat island effect, growing food, and providing space for recreation. It also provides the vital function of containing the further expansion of built development. This has helped to drive the re-use and intensification of London's previously developed brownfield land to ensure London makes efficient use of its land and infrastructure, and that inner urban areas benefit from regeneration and investment.

8.2.2 Openness and permanence are essential characteristics of the Green Belt, but despite being open in character, some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly. This is not, however, an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and reducing the urban heat island effect. The Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt and to improve the quality of these areas in ways that are appropriate within the Green Belt.

Metropolitan Open Land - Policy G3, Page 303

- A. Metropolitan Open Land (MOL) should be protected from inappropriate development: 1) development proposals that would harm MOL should be refused 2) boroughs should work with partners to enhance the quality and range of uses of MOL.
- B. The extension of MOL designations should be supported where appropriate.
- C. Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.
- D. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria: 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

Supporting text:

8.3.1 Metropolitan Open Land is strategic open land within the urban area. It plays an important role in London's green infrastructure – the network of green spaces, features and places around and within urban areas. MOL protects and enhances the open environment and improves Londoners' quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, and health benefits through encouraging walking, running and other physical activity.

8.3.2 The principles of national Green Belt policy also apply to MOL. Any proposed changes to MOL boundaries which result in loss must be accompanied by thorough evidence which demonstrates that there are exceptional circumstances, as set out in the NPPF. The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy.

8.3.3 Proposals to enhance access to MOL and to improve poorer quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL will be encouraged. Examples include improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage.

Local green and open space - Policy G4, Page 305

1. Local green and open spaces should be protected.
 2. The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.
 3. Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required.
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1. The loss of green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.
 2. Development Plans and Opportunity Area Frameworks should: 1) include appropriate designations and policies for the protection of green and open space to address deficiencies 2) ensure that future green and open space needs are planned for in areas with the potential for substantial change 3) ensure that green and open space needs are planned in line with objectives in green infrastructure strategies in order to deliver multiple benefits and in recognition of the cross-borough nature of some forms of green infrastructure.

Supporting text:

4 8.4.1 Green and open spaces – planned, designed and managed as green infrastructure – provide a wide range of social, health and environmental benefits, and are a vital component of London’s infrastructure. Although individual spaces may not provide the strategic functions of Green Belt or MOL, they are nonetheless important at the neighbourhood level, as they are the spaces which most Londoners use most often. Connectivity across the network of green and open spaces is particularly important as this provides opportunities for walking and cycling and for improving wildlife corridors.

8.4.2 Boroughs should undertake a green and open space needs assessment to inform their green infrastructure strategy (drawing from existing strategies such as play, trees and playing pitches).

8.4.3 The creation of new green or open space is essential in helping to meet the Mayor’s long-term target of making more than 50 per cent of London green by 2050. New provision or improved access should be particularly encouraged in areas of deficiency in access to public open space. It will also be important to secure appropriate management and maintenance of open spaces to ensure that a wide range of benefits can be secured and that any conflicts between uses are minimised.

8.4.4 Proposals to enhance green and open spaces to provide a wider range of benefits for Londoners will be encouraged. Examples could include improved public access for all, inclusive design, recreation facilities.

Urban greening - Policy G5, Page 308

LNPCF PROPOSAL: Policy G5 and supporting text must relate and gear urban greening and landscaping to precise needs to restore nature, increase public contact with nature, and access to open space for play, recreation and learning, and build resilience. Such needs can be informed by metrics such as data on nature deficits and public health data and information from the All London Green Grid and GIGL.

1. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
2. 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.

Supporting text:

5 8.5.1 The inclusion of urban greening measures in new development will result in an increase in green cover, and should be integral to planning the layout and design of new buildings and developments. This should be considered from the beginning of the design process.

8.5.2 Urban greening covers a wide range of options including, but not limited to, street trees, green roofs, green walls, and rain gardens. It can provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity – the latter being especially important in the most densely developed parts of the city where traditional green space is limited.

8.5.3 A number of cities have successfully adopted a 'green space factor' to encourage more and better urban greening. The Mayor has developed a generic Urban Greening Factor model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments. This is based on a review of green space factors in other cities. The UGF is currently only applied to major applications, but may eventually be applied to applications below this threshold as boroughs develop their own models. London is a diverse city so it is appropriate that each borough develops its own approach in response to its local circumstances. However, the challenges of climate change, poor air quality and deficiencies in green space need to be tackled now, so while each borough develops its own bespoke approach the Mayor has recommended the standards set out above. Residential development places greater demands on green infrastructure, and as such, a higher standard is justified.

Protecting London's waterways - Policy SI17, Page 365 - 373

LNPCF PROPOSAL: This surprisingly weak policy and supporting text on restoring the natural function of rivers and waterways seem to be after-thoughts reliant on the under-resourced London Rivers Action Plan and voluntary action of catchment partnerships. The text briefly acknowledges that there is more than one river in London before reverting to issues of transport on the Thames, wharves and other matters. Resourcing for action to improve rivers and water course is also not expressly addressed in Chapter 11 on Funding of the London Plan on pages 452-3.

The Policy should explicitly set rivers and waterways as part of Green and Blue Infrastructure, restore use of the Blue Ribbon Network and require adherence to catchment management plans and priority project identified by those.

9.14.2 London's waterways are multifunctional assets. They provide transport and recreation corridors; green infrastructure; a series of diverse and important habitats; a unique backdrop for important heritage sites, landscapes, views, cultural and community activities; and drainage, flood and water management functions. As such, they provide environmental, economic and health and wellbeing benefits for Londoners. They are protected and their water-related use - in particular safe and sustainable passenger and freight transport, tourism, cultural, community and recreational activities, as well as biodiversity - is promoted. Many of these functions are also supported by boroughs' local Riverside Strategies, the Environment Agency's Thames River Basin Management Plan and the Port of London Authority's Vision for the Thames.

1. Development proposals that facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect the foreshore and increase the heritage and habitats value, should be supported if appropriate. Development proposals to impound and constrain waterways should be refused.
2. Development proposals should support and improve the protection of the distinct open character and heritage of waterways.

Supporting text:

9.17.1 London's rivers have been significantly altered from their natural state. River restoration seeks to enhance their biodiversity, water quality and amenity value. The London Rivers Action Plan, and the Catchment Partnerships which support the Thames River Basin Management Plan, identify many opportunities for river restoration, as well as showing examples that have been implemented around London.

Page: [Foreword](#)

Section: [N/A](#)

Foreword

The London National Park City Foundation (LNPCF) supports the Mayor's intention in his Foreword:

- Page xiii: “This new London Plan marks a break with previous London Plans, represents a step-change in our approach and serves as a blueprint for the future development and sustainable, inclusive growth of our city.”
- Page xiv: “We let down future generations if we do not properly plan for accommodating growth in a way which is environmentally, economically and socially sustainable.
- “So this London Plan sets out a new way of doing things, something I am calling Good Growth. Good Growth is about working to re-balance development in London towards more genuinely affordable homes for working Londoners to buy and rent. And it’s about delivering a more socially integrated and sustainable city, where people have more of a say and growth brings the best out of existing places while providing new opportunities to communities.
- “Good Growth is not about supporting growth at any cost, which for too long has been the priority, leaving many Londoners feeling excluded and contributing to a lack of community cohesion and social integration.”
- Pages xv and xvi: “...And a city where access to great culture is built into the fabric of every part of London, with our rich heritage and cultural offer supporting our growing world-class creative industries.”

“I also see the London Plan revolutionising the way we get around our city - enabling a boom in active travel, with walking and cycling becoming the primary, default choice for millions of Londoners because we have made it far easier and safer. I envisage London as a greener city, with high quality open spaces, parks and commons, and one where we lead the way in tackling climate change by moving towards a zero-carbon city by 2050. And when I look to the future, I see London as a city with clean air for our children to breathe...”

Page: [Policy GG1 Building strong and inclusive communities](#)

Section: [N/A](#)

Building strong and inclusive communities – Policy GG1, Page 13

LNPCF supports Policy GG1 to:

B - Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.

C - Ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish.

D - Promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for face-to-face contact and social interaction during the daytime, evening and night time.

E - Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.

Page: [Policy GG2 Making the best use of land](#)

Section: [N/A](#)

Making the best use of land – Policy GG2, Pages 14 - 16

LNPCF supports the intention to:

1.2.1 This rapid growth will bring many opportunities, but it will also lead to increasing and competing pressures on the use of space. To accommodate growth while protecting the Green Belt, and for this growth to happen in a way that improves the lives of existing and new Londoners, this Plan proposes more efficient uses of the city's land.

1.2.2 The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space efficiently, but also better for the people who use them. This will mean creating places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses, and co-locating different uses to provide communities with a wider range of services and amenities.

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 50 per cent green cover across London, will be important to help London become a National Park City.

1.2.7 London's distinctive character and heritage is why many people want to come to the city. As new developments are designed, the special features that Londoners value about a place, such as cultural, historic or natural elements, can be used positively to guide and stimulate growth, and create distinctive, attractive and cherished places.

Policy GG2

LNPCF supports Policy GG2:

To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:

- A. Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.
- B. Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach.
- C. Understand what is valued about existing places and use this as a catalyst for growth and place-making, strengthening London's distinct and varied character.
- D. Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.

E. Plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth.

F. Maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.

Page: [Policy GG3 Creating a healthy city](#)

Section: [N/A](#)

Creating a healthy city - Pages 16 - 17

LNPCF supports the intention to:

1.3.1 The health of Londoners is, to a large extent, determined by the environment in which they live. Transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by the planning system, and local authorities are accordingly responsible for planning and public health.

1.3.2 The scale of London's health inequalities is great, and the need to reduce them is urgent. Healthy life expectancy is lower in more deprived areas, and the differences between parts of London is stark – more than 15 years for men and almost 19 years for women. London's ongoing growth provides an opportunity to reduce these inequalities, and delivering Good Growth will involve prioritising health in all London's planning decisions.

1.3.3 The causes of London's health problems are wide-ranging. Many of London's major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access varies widely across the city. Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts. A healthy food environment and access to healthy food is vital for good health. Good planning can help address all of these issues.

1.3.4 The Healthy Streets Approach outlined in this plan puts improving health and reducing health inequalities at the heart of planning London's public space. It will tackle London's inactivity crisis, improve air quality and reduce the other health impacts of living in a car-dominated city by planning street networks that work well for people on foot and on bikes, and providing public transport networks that are attractive alternatives to car use. It will also ensure that streets become more social spaces.

LNPCF supports Policy GG3:

To improve Londoners' health and reduce health inequalities, those involved in planning and development must:

1. Ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.
2. Promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices.
3. Use the Healthy Streets Approach to prioritise health in all planning decisions.
4. Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments.
5. Plan for improved access to green spaces and the provision of new green infrastructure.
6. Ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold.
7. Seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.

Delivering the homes Londoners need - Policy GG4, Page 19 - 20

LNPCF PROPOSAL: Policy GG4 does not address housing’s outdoor surroundings apart from perhaps in a highly condensed way in part D of the policy:

“Identify and allocate a range of sites, including small sites, to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset.”

Policy GG4 and its supporting text (see below) should expressly mention the need for quality open space for play, recreation and other access as a break from built development.

1.4.9 The things that make London’s economy so strong are the same things that make London an attractive and exciting place to live, work and visit. London’s ethos of tolerance and respect, its rich cultural and historic assets, the quality of its streets and public places, its spirit of creativity and entrepreneurialism – these things attract businesses of all sizes and allow them to develop and thrive. The people who these businesses employ need strong communities, pleasant environments that promote good health, and good quality, affordable homes in places they want to live. The continuing success of London’s economy is reliant upon making the city work better for everyone.

1.4.11 The right infrastructure is also required to help businesses succeed across London. The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processes, opening up new markets and allowing more flexible working. Convenient transport connections and street, rail and waterway networks that allow the efficient movement of goods and people are also vital, alongside the schools, healthcare facilities and other amenities that employees need to be healthy and productive.

Growing a good economy - Policy GG5, Page 21

LNPCF PROPOSAL: LNPCF finds that Policy GG5 does not explicitly cover nature and quality green and natural space and that either parts D and F of the policy should be strengthened and made more explicit to mention the need for quality green open space for a range of reasons, or that a new part G should capture this:

CURRENT TEXT:

To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

1. Promote the strength and potential of the wider city region.
2. Seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London.
3. Plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.
4. Ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth.
5. Ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning.
6. Promote and support London's rich heritage and cultural assets, and its role as a 24-hour city.

LNPCF PROPOSES ADDING:

1. Ensure development and regeneration provides quality green open space for play, recreation and other access as a break from built development and to ensure all schemes play an active role in restoring nature, public health and London's resilience.

LNPCF supports the intention of the supporting paragraphs on page 27:

2.0.2 London's green and open spaces are a vital part of the capital. Its parks, rivers and green open spaces are some of the places that people most cherish and they bring the benefits of the natural environment within reach of Londoners. London's Green Belt and Metropolitan Open Land designations (see Chapter 8) serve to protect these strategically important open spaces, prevent urban sprawl and focus investment and development on previously developed land.

2.0.4 ... proper planning of utilities and communications capacity and the social infrastructure that supports the day-to-day lives of Londoners, well in advance of new development. Opportunity Area Planning Frameworks and Local Plans should have clear strategies for their delivery.

Page: [Policy SD4 The Central Activities Zone \(CAZ\)](#)

Section: [N/A](#)

The Central Activities Zone (CAZ) - Policy SD4, Page 66 - 69

LNPCF supports the intention to:

2.4.7 The distinct environment and heritage of the CAZ should be sustained and enhanced through development decisions, Local Plans and other initiatives such as the transformation of Oxford Street. This should recognise both its strategic elements, including the River Thames, the Royal Parks, World Heritage Sites, Designated Views and unique concentration of heritage assets, as well as more local features including the public realm, smaller waterways and green and open spaces.

2.4.8 Air quality in the CAZ is particularly poor due to the intensity of the road network and land uses. The CAZ also experiences high levels of construction which results in dust and emissions from construction activities and equipment that adversely affect air quality. The Mayor is taking practical steps to improve air quality in the CAZ including the T-charge and stricter Ultra-Low Emission Zone which will impose charges on the most polluting vehicles.

Town centres - Policy SD6, Pages 78 - 79

LNPCF PROPOSAL: LNPCF finds that Policy SD6 overlooks quality urban greening of high biodiversity value and it is not explicit from the text below that these will be covered by Policy SD6's use of the term 'social infrastructure':

1. London's varied town centres and their vitality and viability should be promoted and enhanced as:
 - 1) strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development
 - 2) locations for mixed-use or housing-led intensification and higher-density renewal, securing a high-quality environment and complementing local character and heritage assets...(and)
 - 6) a key mechanism for building sustainable, healthy, walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management.

LNPCF notes that 'social infrastructure' is defined on page 202 as follows:

5.1.1 Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes health provision, education, community, play, youth, recreation, sports, faith, and emergency facilities.

We also note that Green infrastructure in all its forms is also a key component of social infrastructure, and is addressed separately in Chapter 8, Policy G3 Metropolitan Open Land and Policy G4 Local green and open space.

Town centres - Policy SD6, Pages 78 - 79

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Town centre network - Policy SD7, Pages 81 and 82

LNPCF PROPOSAL: LNPCF finds the same for Policy SD7 as for Policy SD6 above.

Page: [Policy SD10 Strategic and local regeneration](#)

Section: [N/A](#)

Strategic and local regeneration, Page 94

LNPCF supports the stated intentions:

2.10.6 The Areas for Regeneration are home to many established and varied communities, and there is likely to be a strong sense of place, local identity, and character that is reflected in the buildings, streets and spaces in the area, the lives of the people that live there and the activities that take place. Local Plans, Opportunity Area Planning Frameworks, and regeneration strategies should identify, protect and promote the places and spaces that are particularly valued by local communities, including cultural venues, heritage assets, community facilities and social infrastructure, as well as creating new spaces for people to enjoy.

LNPCF PROPOSAL: LNPCF proposes that enjoyment is subjective whereas policies which are playing a role in restoring high quality nature are not, and should be part of this policy.

Design: London's form and characteristics - Policy D1, Pages 98 - 100

Design: London's form and characteristics - Policy D1, Pages 98 - 100

LNPCF PROPOSAL: LNPCF finds that Policy D1 and its supporting text is too general in overlooking the need for spaces and development to actively contribute to restoring high quality nature.

CURRENT TEXT:

B Development design should:...

3) aim for high sustainability standards

4) respect, enhance and utilise the heritage assets and architectural features that make up the local character

5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water

6) achieve comfortable and inviting environments both inside and outside buildings.

3.1.4 Maximising urban greening and creating green open spaces provides attractive places for Londoners to relax and play, and helps make the city more resilient to the effects of climate change. Landscaping and urban greening should be designed to ecologically enhance and, where possible, physically connect, existing parks and open spaces.

LNPCF PROPOSAL: Policy D1 and supporting text must relate and gear urban greening and landscaping to precise needs to restore nature, increase public contact with nature, and access to open space for play, recreation and learning, and build resilience. Such needs can be informed by metrics such as data on nature deficits and public health data and information from the All London Green Grid and GIGL.

Communal play space for children and young people, Page 113

LNPCF supports the intention:

3.4.7 Communal play space for children and young people should be provided in developments with an estimated occupancy of ten children or more in accordance with the requirement of Policy S4 Play and informal recreation.

Page: [Policy D7 Public realm](#)

Section: [N/A](#)

Public realm - Policy D7, Page 122

LNPCF PROPOSAL: Policy D7 mentions urban greening but not particularly convincingly such that public realm will activity contribute to restoring urban nature rather than the current common approach to the installation of trees in concrete or tubs and planting of low nature value. Key sections of the current text are:

H Incorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity.

I Ensure that shade and shelter are provided with appropriate types and amounts of seating to encourage people to spend time in a place, where appropriate. This should be done in conjunction with the removal of any unnecessary or dysfunctional clutter or street furniture to ensure the function of the space and pedestrian amenity is improved. Applications which seek to introduce unnecessary street furniture should normally be refused.

J Explore opportunities for innovative approaches to improving the public realm such as open street events.

K Create an engaging public realm for people of all ages, with opportunities for formal and informal play and social activities during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm.

L Ensure that on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Pedestrian crossings should be regular, convenient and accessible.

Page: [Policy S3 Education and childcare facilities](#)

Section: [N/A](#)

Education and childcare facilities - Policy S3, Page 208

B 8) ensure that facilities incorporate suitable, accessible outdoor space

9) locate facilities next to parks or green spaces, where possible

10) ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.

LNPCF PROPOSAL: LNPCF finds that this policy (parts B 8, 9 and 10) referring to school open space and access provides a get-out clause to remove space if this can be justified, which is highly likely. The supporting paragraph on page 211 should be made part of *Policy S3* with more enthusiasm:

Where possible, natural features such as trees, greenery and spaces for food growing should be incorporated into playgrounds and school sites, recognising both the health and educational benefits these can provide. Healthy and safe routes to education and childcare facilities, should be considered through the design process.

Play and informal recreation - Policy S4

LNPCF PROPOSAL: LNPCF find that the policy and supporting text underplay the role of natural play and lack strength in how this is part and parcel of play, of being outdoors and of informal and formal learning and recreation.

A. Boroughs should:

- 1) undertake audits of existing play and informal recreation provision and opportunities, and assessments of need, considering the quantity, quality and accessibility of provision
- 2) produce strategies on play and informal recreation facilities and opportunities, supported by Development Plan policies, to address identified needs.

B Development proposals for schemes that are likely to be used by children and young people should:

- 1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile
- 2) for residential developments, incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that:
 - a) provides a stimulating environment
 - b) can be accessed safely from the street by children and young people independently
 - c) forms an integral part of the surrounding neighbourhood
 - d) incorporates trees and/or other forms of greenery.
- 3) incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently
- 4) for large-scale public realm developments, incorporate incidental play space to make the space more playable

5) not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.

4) mobile within their neighbourhood, is important for children and young people's wellbeing and development.

5.4.2 Many children and young people, however, find that there are limited opportunities for them to play in their local neighbourhood. This is often not because of a lack of formal play provision, but due to restrictive street design and layouts, poor links between spaces for play and recreation, and the threat of busy roads and traffic. Developments should encourage children and young people to move around freely through safe streets and footpath networks that connect to more formal play provision, green spaces and parks, and that follow the Healthy Streets Approach.

5.4.3 Where formal play provision is provided in new developments, it should be free, well-designed, accessible, inclusive and stimulating. It should integrate into the wider network of public open spaces and not be severed from the rest of a neighbourhood by physical barriers such as main roads. Play provision should be overlooked in some way to allow for a level of informal community supervision and generate a sense of safety and security. Integrating natural environments into play provision is encouraged, acknowledging the benefits to learning, and to help to support a green infrastructure network across the city.

5.4.4 There should be appropriate provision for different age groups, including older children and teenagers. Particular consideration should be given to consultation with children and young people in the design of new provision to understand their changing needs. The needs of parents and carers should also be considered in the design of these spaces. Appropriate arrangements for management and maintenance of play and communal facilities should be provided. Youth facilities for young people should also be incorporated where possible to ensure that young people have suitable spaces to meet and play and feel welcome and included in developments and the public realm.

5.4.5 Formal play provision should normally be made on-site and in accordance with Development Plans' play policies for the area, using a benchmark of 10 square metres per child as a basis for assessing future requirements arising from a projected increase in the child population of the area. Supplementary Planning Guidance will provide additional detail on the application of this benchmark and other implementation issues. Where development is to be phased, there should be an early implementation of play space.

5.4.6 Off-site provision, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents. This is likely to be more appropriate for the provision of play facilities for older children, who can travel further to access it, but should still usually be within 400 metres of the development and be accessible via a safe route from children's homes. Schools, school playing fields and other facilities can also provide an important contribution to play and informal recreation facilities and should be encouraged to allow community access to facilities out of hours.

5.4.7 Through the development of play strategies, boroughs should ensure the integration of play provision and child-friendly neighbourhoods into other borough strategies.

Page: [Policy HC1 Heritage conservation and growth](#)

Section: [N/A](#)

Heritage conservation and growth - Policy HC1, Pages 268 - 269

LNPCF supports Policy HC1:

7.1.1 London's historic environment, represented in its built form, landscape heritage and archaeology, provides a depth of character that benefits the city's economy, culture and quality of life. The built environment, combined with its historic landscapes, provides a unique sense of place, whilst layers of architectural history provide an environment that is of local, national and international value. London's heritage assets and historic environment are irreplaceable and an essential part of what makes London a vibrant and successful city, and their effective management is a fundamental component of achieving good growth.

7.1.2 London's diverse range of designated and non-designated heritage assets contributes to its status as a world-class city. Designated assets currently include four World Heritage Sites, over 1,000 conservation areas, 19,000 list entries for historic buildings, 150 registered parks and gardens, 160 scheduled monuments, and one battlefield. Non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows and ancient woodlands.

7.5.1 London's rich cultural offer includes visual and performing arts, music, spectator sports, festivals and carnivals, pop-ups and street markets, and a diverse and innovative food scene, which is important for London's cultural tourism. The capital's cultural offer is often informed, supported and influenced by the work of the creative industries such as advertising, architecture, design, fashion, publishing, television, video games, radio and film. Cultural facilities and venues include premises for cultural production and consumption such as performing and visual arts studios, creative industries workspace, museums, theatres, cinemas, libraries, and music and other entertainment venues, including pubs and night clubs. Although primarily serving other functions, the public realm, parks, skate-parks and sports venues can provide important settings for a wide range of arts and cultural activities.

Page: [Policy G1 Green infrastructure](#)

Section: [N/A](#)

Green infrastructure - Policy G1, Pages 302

LNPCF supports Policy G1:

A. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.

B. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.

C. Development Plans and Opportunity Area Planning Frameworks should: 1) identify key green infrastructure assets, their function and their potential function 2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

Supporting text:

8.1.1 A green infrastructure approach recognises that the network of green spaces, street trees, green roofs and other major assets such as natural or semi-natural drainage features must be planned, designed and managed in a more integrated way to meet multiple objectives including: promoting mental and physical health and wellbeing; adapting to the impacts of climate change; improving air and water quality; encouraging walking and cycling; and conserving and enhancing biodiversity and ecological resilience alongside more traditional functions of green space such as play, sport and recreation.

8.1.2 All development takes place within a wider environment and green infrastructure should be seen as an integral element and not as an 'add on'. It's economic and social value has become increasingly evident across all of London at all scales and has been highlighted in the London i-Tree Assessment and the Natural Capital Account for London's Public Parks.

8.1.3 To help deliver on his manifesto commitment to make London at least 50 per cent green by 2050, the Mayor will review and update existing Supplementary Planning Guidance on the All London Green Grid – London's strategic green infrastructure framework - to provide guidance on the strategic green infrastructure network and the preparation of green infrastructure strategies.

Page: [Policy G2 London's Green Belt](#)

Section: [N/A](#)

London's Green Belt - Policy G2, Page 303

LNPCF supports Policy G2:

A. The Green Belt should be protected from inappropriate development: 1) development proposals that would harm the Green Belt should be refused 2) the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported.

B. The extension of the Green Belt will be supported, where appropriate. It's *(sic)* de-designation will not.

Supporting text:

8.2.1 The Mayor strongly supports the continued protection of London's Green Belt. The NPPF provides a clear direction for the management of development within the Green Belt and sets out the processes and considerations for defining Green Belt boundaries. London's Green Belt makes up 22 per cent of London's land area and performs multiple beneficial functions for London, such as combating the urban heat island effect, growing food, and providing space for recreation. It also provides the vital function of containing the further expansion of built development. This has helped to drive the re-use and intensification of London's previously developed brownfield land to ensure London makes efficient use of its land and infrastructure, and that inner urban areas benefit from regeneration and investment.

8.2.2 Openness and permanence are essential characteristics of the Green Belt, but despite being open in character, some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly. This is not, however, an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and reducing the urban heat island effect. The Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt and to improve the quality of these areas in ways that are appropriate within the Green Belt.

Page: [Policy G3 Metropolitan Open Land](#)

Section: [N/A](#)

Metropolitan Open Land - Policy G3, Page 303

- A. Metropolitan Open Land (MOL) should be protected from inappropriate development: 1) development proposals that would harm MOL should be refused 2) boroughs should work with partners to enhance the quality and range of uses of MOL.
- B. The extension of MOL designations should be supported where appropriate.
- C. Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.
- D. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria: 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

Supporting text:

8.3.1 Metropolitan Open Land is strategic open land within the urban area. It plays an important role in London's green infrastructure – the network of green spaces, features and places around and within urban areas. MOL protects and enhances the open environment and improves Londoners' quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, and health benefits through encouraging walking, running and other physical activity.

8.3.2 The principles of national Green Belt policy also apply to MOL. Any proposed changes to MOL boundaries which result in loss must be accompanied by thorough evidence which demonstrates that there are exceptional circumstances, as set out in the NPPF. The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy.

8.3.3 Proposals to enhance access to MOL and to improve poorer quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL will be encouraged. Examples include improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage.

Local green and open space - Policy G4, Page 305

1. Local green and open spaces should be protected.
 2. The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.
 3. Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required.
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1. The loss of green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.
 2. Development Plans and Opportunity Area Frameworks should: 1) include appropriate designations and policies for the protection of green and open space to address deficiencies 2) ensure that future green and open space needs are planned for in areas with the potential for substantial change 3) ensure that green and open space needs are planned in line with objectives in green infrastructure strategies in order to deliver multiple benefits and in recognition of the cross-borough nature of some forms of green infrastructure.

Supporting text:

4 8.4.1 Green and open spaces – planned, designed and managed as green infrastructure – provide a wide range of social, health and environmental benefits, and are a vital component of London’s infrastructure. Although individual spaces may not provide the strategic functions of Green Belt or MOL, they are nonetheless important at the neighbourhood level, as they are the spaces which most Londoners use most often. Connectivity across the network of green and open spaces is particularly important as this provides opportunities for walking and cycling and for improving wildlife corridors.

8.4.2 Boroughs should undertake a green and open space needs assessment to inform their green infrastructure strategy (drawing from existing strategies such as play, trees and playing pitches).

8.4.3 The creation of new green or open space is essential in helping to meet the Mayor's long-term target of making more than 50 per cent of London green by 2050. New provision or improved access should be particularly encouraged in areas of deficiency in access to public open space. It will also be important to secure appropriate management and maintenance of open spaces to ensure that a wide range of benefits can be secured and that any conflicts between uses are minimised.

8.4.4 Proposals to enhance green and open spaces to provide a wider range of benefits for Londoners will be encouraged. Examples could include improved public access for all, inclusive design, recreation facilities.

Page: [Policy G5 Urban greening](#)

Section: [N/A](#)

Urban greening - Policy G5, Page 308

LNPCF PROPOSAL: Policy G5 and supporting text must relate and gear urban greening and landscaping to precise needs to restore nature, increase public contact with nature, and access to open space for play, recreation and learning, and build resilience. Such needs can be informed by metrics such as data on nature deficits and public health data and information from the All London Green Grid and GIGL.

1. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
2. 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.

Supporting text:

5 8.5.1 The inclusion of urban greening measures in new development will result in an increase in green cover, and should be integral to planning the layout and design of new buildings and developments. This should be considered from the beginning of the design process.

8.5.2 Urban greening covers a wide range of options including, but not limited to, street trees, green roofs, green walls, and rain gardens. It can provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity – the latter being especially important in the most densely developed parts of the city where traditional green space is limited.

8.5.3 A number of cities have successfully adopted a ‘green space factor’ to encourage more and better urban greening. The Mayor has developed a generic Urban Greening Factor model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments. This is based on a review of green space factors in other cities. The UGF is currently only applied to major applications, but may eventually be applied to applications below this threshold as boroughs develop their own models. London is a diverse city so it is appropriate that each borough develops its own approach in response to its local circumstances. However, the challenges of climate change, poor air quality and deficiencies in green space need to be tackled now, so while each borough develops its own bespoke approach the Mayor has recommended the standards set out above. Residential development places greater demands on green infrastructure, and as such, a higher standard is justified.

Page: [Policy SI17 Protecting London's waterways](#)

Section: [N/A](#)

Protecting London’s waterways - Policy SI17, Page 365 - 373

LNPCF PROPOSAL: This surprisingly weak policy and supporting text on restoring the natural function of rivers and waterways seem to be after-thoughts reliant on the under-resourced London Rivers Action Plan and voluntary action of catchment partnerships. The text briefly acknowledges that there is more than one river in London before reverting to issues of transport on the Thames, wharves and other matters. Resourcing for action to improve rivers and water course is also not expressly addressed in Chapter 11 on Funding of the London Plan on pages 452-3.

The Policy should explicitly set rivers and waterways as part of Green and Blue Infrastructure, restore use of the Blue Ribbon Network and require adherence to catchment management plans and priority project identified by those.

9.14.2 London's waterways are multifunctional assets. They provide transport and recreation corridors; green infrastructure; a series of diverse and important habitats; a unique backdrop for important heritage sites, landscapes, views, cultural and community activities; and drainage, flood and water management functions. As such, they provide environmental, economic and health and wellbeing benefits for Londoners. They are protected and their water-related use - in particular safe and sustainable passenger and freight transport, tourism, cultural, community and recreational activities, as well as biodiversity - is promoted. Many of these functions are also supported by boroughs' local Riverside Strategies, the Environment Agency's Thames River Basin Management Plan and the Port of London Authority's Vision for the Thames.

1. Development proposals that facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect the foreshore and increase the heritage and habitats value, should be supported if appropriate. Development proposals to impound and constrain waterways should be refused.
2. Development proposals should support and improve the protection of the distinct open character and heritage of waterways.

Supporting text:

9.17.1 London's rivers have been significantly altered from their natural state. River restoration seeks to enhance their biodiversity, water quality and amenity value. The London Rivers Action Plan, and the Catchment Partnerships which support the Thames River Basin Management Plan, identify many opportunities for river restoration, as well as showing examples that have been implemented around London.