

Royal Botanic Gardens, Kew comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

Royal Botanic Gardens, Kew welcomes the opportunity to respond to the new London Plan consultation. RBG Kew is a London institution with expertise in several of the policy areas included in this Plan; green spaces, trees and woodlands, food growing, heritage conservation and the management of a UNESCO world heritage site. We will be responding to the policies and proposals included in Chapter 7, Heritage and Culture and Chapter 8, Green Infrastructure and the Natural Environment.

This response builds on the comments we submitted to the London Environment Strategy. The Mayor's continuing recognition that the environment is not an issue to be sidelined or isolated is truly welcome. We look forward to continuing to work closely with the Mayor and the Greater London Authority, and welcome further opportunities for engagement.

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

Section: [HC1](#)

HC1A

We agree that Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. Furthermore, Boroughs should consult neighbouring Boroughs and consider the historic environment and heritage assets in close proximity to the Borough boundary when developing their understanding of the historic environment and making plans for enhancements.

HC1B

We agree that Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. Boroughs should also consult neighbouring Boroughs and consider the historic environment and heritage assets in close proximity to the Borough boundary when demonstrating their understanding of the historic environment and heritage values of sites or areas.

HC1C

We agree that development proposals affecting heritage assets should conserve their significance, and recommend adding that boroughs should also consult neighbouring Boroughs and consider the historic environment and heritage assets in close proximity to the Borough boundary when considering development proposals.

Page: [Policy HC2 World Heritage Sites](#)

Section: [HC2](#)

As a UNESCO World Heritage Site (WHS) we are glad to see specific consideration laid out for sites such as ours in the London Plan. Overall, we support and endorse the statements and intentions laid out in this section, however we note that much of it reflects what already exists in planning law and previous guidelines.

The main risk to Kew's Outstanding Universal Value (OUV) inscribed in Kew's designation as a World Heritage Site is inappropriate redevelopment of Brentford (in the neighbouring Borough of Hounslow), and in particular the large scale high rise developments which can be seen from Kew Gardens and the Buffer Zone. Other key attributes contributing to our Outstanding Universal Value as a World Heritage Site are at risk; the diverse historic landscape and relationship with the River Thames, and wider Arcadian landscape beyond. Key historic vistas like the Syon House vista should remain uninterrupted by modern and insensitive development.

HC2A

We strongly support the recommendation that Boroughs containing a UNESCO World Heritage Site and their neighbours work together to conserve and protect their Outstanding Universal Value. We believe this cross Borough cooperation should be emphasised in other policy areas relating to World Heritage Sites.

HC2C

We welcome this policy and recommend that developers who are producing Heritage Impact Assessments should consult World Heritage Site management authorities in developing their assessments and planners should ensure World Heritage Site management authorities are invited to comment on those assessments before planning decisions are taken.

HC2D

We agree that up-to-date World Heritage Site Management Plans should be used to inform the plan-making process, and when considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plan.

A new World Heritage Site Management Plan for Kew is being produced (current version 2014). One of its key features will be more planning guidance and tools to assist both the developers and local planning offices as they undertake their Heritage Impact Assessment. The new WHS Management Plan will put in place measures to improve communication with local councils/planners and their understanding of Kew's Outstanding Universal Value (OUV). Developing initiatives such as 3D mapping of the London landscape will also aid in parties' understanding of the development and evolution of the London landscape, as well as the potential impact on views and backdrops to important buildings and structures. This type of technology is already being deployed to bring to life some of the UK's most dramatic landscapes as 3D mapping software by Ordnance Survey (OS) is being used to plot walks through the UK countryside.

HC3D

We are pleased to see that the Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity, and attributes of Outstanding Universal Value. We would urge the Mayor to engage stakeholders in the process of identifying these views. We believe that important views within World Heritage Sites should also be identified and protected in recognition of the importance these views play in defining the Outstanding Universal Value of World Heritage Sites.

HC3E

We are pleased to see that the Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity, and attributes of Outstanding Universal Value. We would urge the Mayor to engage stakeholders in the process of identifying these views. We believe that important views within World Heritage Sites should also be identified and protected in recognition of the importance these views play in defining the Outstanding Universal Value of World Heritage Sites.

We would like to propose two additions to the list of River Prospects included in the Designated Views in the current London Plan.[1]

Kew Bridge

The view downstream is towards Strand-on-the-Green is relatively unchanged. The view upstream has seen much redevelopment on the Brentford side. This is largely concealed by trees on Brentford Ait and Lots Ait. This view upstream on the Kew side retains much of its "Arcadian" aspect. However we have been concerned about new developments in Brentford town centre breaching the treeline on Brentford Ait, when viewed from Kew Bridge.

Syon Vista opposite Syon House

The view from the end of Syon Vista in Kew Gardens towards Syon House is a river prospect within the “Arcadian Thames”. The view is of exceptional sensitivity, offering an uninterrupted treeline, except for the Brentford towers in the distance downstream. Syon Park was laid out by Capability Brown in the 1760s and there are also remnants of the gardens designed by Brown on the Kew side. The landscape here is unique in that there are Brown landscapes on both sides of the river.

These views are both referred to in the Kew World Heritage Site Management Plan. We feel there is a good case for these to be given further protection within the London Plan.

[1] Current London Plan, Chapter 7, Policy 7.11 London view management framework <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-seven-londons-living-space-2>

Page: [Policy G1 Green infrastructure](#)

Section: [G1](#)

We consider it to be crucial to the success of the London Plan that a narrative about the importance of green infrastructure be generated. This will help to raise awareness and educate the public about what types of green infrastructure they can expect to see and how they can support fit-for-purpose development of spaces for their community.

We recommend that a register of green infrastructure spaces be created, where councils, developers and local stakeholders can input information.

Putting green infrastructure into the framework of natural capital and ecosystem services (where green infrastructure can be monitored as a set of natural capital assets that deliver ecosystem services, which benefit Londoners) would help align London policy with national policy. We recommend treating green infrastructure as part of the stock of natural capital assets, in order to maintain consistency with and mirror the language of the Government's recent 25 Year Environment Plan.

G1A

We agree that 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.

As a feature of green infrastructure, we advise that provisions need to be made for the proactive management and continued maintenance of street trees. We also consider it to be a vital part of the success of the London Plan that existing trees in London be properly looked after and that a plan for their continued maintenance and management be developed with local tree officers before committing to planting additional trees under the new London Plan. It is vital that Boroughs receive proper advice and support on how to manage, maintain and nurture trees in their areas. It will be necessary to engage with the arboriculture sector to help ensure that Boroughs have access to the right advice to maintain trees.

In order to plan and manage street trees in the most effective and appropriate manner, it is vital that the optimum species be selected for its surroundings. London should aspire to have a wide diversity of trees with a mix of different species, different ages, from different genetic stock existing in local areas. This will help improve the resilience of London's green infrastructure to future environmental changes and challenges. Please see Kew's response to the London Environment Strategy regarding species mix, native vs non-native and the resilience gained through diversity of planting. We also refer you to the paper written by Kew's Director of Science, Professor Kathy Willis: 'The natural capital of city trees', *Science*, 28 Apr 2017: Vol. 356, Issue 6336, pp. 374-376.

Page: [Policy G1 Green infrastructure](#)

Section: [G1](#)

G1B:

We agree that Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation, and strongly recommend that air quality be included in the list of objectives along with other ecosystem services provided by green infrastructure natural capital assets.

Page: [Policy G1 Green infrastructure](#)

Section: [G1](#)

G1C

We recommend that Development Plans and Opportunity Area Planning Frameworks take brownfield sites and land banks into consideration and account when looking to identify key green infrastructure assets and their potential function. These are pockets of land which could be excellent sources of, and resources for wildlife. We believe that they should be managed as part of the green infrastructure network.

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

Section: [G2](#)

G2A

We strongly support protecting the Green Belt from inappropriate development. We recommend that when considering development proposals in the Green Belt, that the biodiversity net gain principle should be applied. We note that the net gain principle was included in the London Environment Strategy, in Policy 5.2.1, but does not appear in the consultation document for the London Plan, and therefore ask that it be explicitly included.

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

Section: [G3](#)

We recommend that the London Plan explicitly states that Metropolitan Open Land should be used in a way which enhances Londoners' engagement with, enjoyment of and access to green spaces.

G3A1

We agree that Metropolitan Open Land (MOL) should be protected from inappropriate development and recommend that any proposed development to MOL should first have the biodiversity net gain principle applied and assessed before being permitted.

While we support the refusal of any development proposals which could harm MOL, we are aware that decisions should be made on a case by case basis. Any development on MOL should enhance the access, enjoyment and engagement of people with the features of the land that led it to be designated as MOL.

We would like to see more consideration of biodiversity explicitly included in Policy G4 Local Green and Open Spaces, with efforts to introduce different types of plant and fungi species in addition to trees, grasses, shrubs etc.

G4A

We recommend that not only are local green and open spaces protected, but also actively managed to enhance the biodiversity contained there and increase their natural capital value.[1] While the commitment to protect and create more green space is excellent, we are aware that some green spaces when not properly managed can become 'green deserts', with no real natural capital value.

One way to create more biodiverse green spaces with natural capital value could, for instance, be to plant orchards around sports fields or on school grounds. Wildflower seed mixes are also great way to bring biodiversity to open spaces, and we recommend a mix of annual and perennial plants, which provides both instant displays and some longer lived and larger plants.

G4B

We strongly support the creation of new areas of publicly-accessible green and open spaces. Kew's outreach programme, Grow Wild, is the UK's biggest ever wild flower campaign, bringing people together to transform urban and unloved local spaces with native, pollinator friendly wild flowers and plants. The community projects Grow Wild has funded demonstrate how sowing and growing UK native wild flowers and plants can bring new life to previously derelict sites and strengthen community links. [2]

Another example of excellent planting in publicly-accessible spaces is the Pictorial Meadow project.[3] The Olympic Park wildflower meadows, a striking feature during the Games and part of the Park's legacy, is a great example of new areas of publicly-accessible green and open space brought to life with engaging planting. Pictorial Meadows have worked with city and local councils, including Coventry and Richmond Upon Thames. Public and open spaces can be both full of biodiversity and low maintenance if they are planned properly using expert advice.

G4D

We recommend that the biodiversity net gain principle be applied both in areas of deficiency and in cases of losses proposed outside of areas of deficiency.

G4E

We recommend that Development Plans and Opportunity Area Planning Frameworks take brownfield sites and land banks into consideration and account when looking to identify key green infrastructure assets and their potential function. These are pockets of land which could be excellent sources of and resources for wildlife. We believe that they should be managed as part of the green infrastructure network.

[1] Natural capital is our 'stock' of waters, land, air, species, minerals and oceans. This stock underpins our economy by producing value for people, both directly and indirectly. <http://www.naturalcapitalcommittee.org/natural-capital/>

[2] Grow Wild <https://www.growwilduk.com/content/our-funded-projects>

[3] Pictorial Meadows <http://www.pictorialmeadows.co.uk/case-study/olympic-park-meadows/>

Page: [Policy G6 Biodiversity and access to nature](#)

Section: [G6](#)

G6C

We agree that Sites of Importance for Nature Conservation (SINCs) should be protected and strongly advise that the biodiversity net gain principle should be applied wherever SINC harm is unavoidable.

We welcome the London Plan's protection, planting, and valuation of trees. Policy G7 Trees and Woodlands, however, must explicitly recognise that one of the greatest threats to trees in London is the arrival or spread of pests and pathogens. For example, plane wilt disease (also known as canker stain of plane, originating from the eastern United States) could cause widespread devastation if it arrived in London, and oak processionary moth, a native of southern Europe and already found in south-west London, is continuing to spread. We recommend that Mayor of London develops a clear and well-resourced policy for monitoring tree health in London, and for rapid responses to contain, eliminate or mitigate the effects of newly emerging pests and pathogens.

The London Tree Officers Association is an expedient resource and we strongly recommend using them as close advisers as Policy G7 is developed, in order to fully understand where a lack of resources might pose a risk to implementation of proposed initiatives. We also recommend supporting Councils in engaging in a public awareness raising campaign to highlight the challenge of this community of experts and working with Councils to make sure that this Association is fit-for-purpose under the new policy initiatives of the London Environment Strategy and the London Plan. We recognise that London Tree Week exists to celebrate London's trees and woodlands with a series of special events and we recommend highlighting the role of tree officers through this campaign.

G7A

We agree that trees and woodlands should be protected, and new trees and woodlands be planted in appropriate locations in order to increase the extent of London's urban forest. Policy G7A should also explicitly say that it is necessary that existing trees and woodlands be actively managed, with adequate resources provided for their appropriate aftercare.

We welcome the continued goals to increase tree cover and efforts to plant new trees, however as stated in G1A we also consider it vital that existing trees be properly looked after before new planting begins. We emphasise our responses to policy G1A and to the London Environment Strategy that London should aspire to have a wide diversity of trees with a mix of different species, different ages, from different genetic stock existing in local areas. This will help improve the resilience of London's green infrastructure to future environmental changes and challenges.

We recommend that native species should be prioritised when considering the creation or enhancement of green spaces. Native species are part of the existing ecosystem and so interact with other plants, fungi and animals to create a resilient natural environment. Where native species are not appropriate for an area, or where it is believed they won't be suitable over the coming decades because of the changes in environmental conditions experienced in cities and expected to continue into the future, we recommend the protection and prioritisation of non-native species which provide ecosystem services and natural capital of value to London. It is important to consider the risks around the introduction of novel species, such as invasiveness or other negative impacts.

G7B1

We welcome the recognition and protection of veteran trees and ancient woodland, but stress that more of these trees need to be identified in order to be protected. It is crucial that people understand that veteran trees and ancient woodlands often contain greater amounts of biodiversity than younger trees.

We recommend that Policy G7B1 also explicitly recognises the ecosystem services provided by 'standing dead wood'; A plan on how to maintain veteran, ancient and 'dead wood' should be included here. Active management of dead wood will include considerations of biodiversity value and public safety'.

G7B2

Policy G7B2 should specifically identify criteria for 'strategic' locations for tree planting.

G7C

We agree that development proposals should ensure that, wherever possible, existing trees of quality are retained. We strongly recommend that the potential future benefit of the trees planned for removal also be valued when considering 'adequate replacement' and that, where appropriate, the biodiversity net gain principle be applied.

We were pleased to see Food Growing included in the London Plan. Kew's Kitchen Garden was voted 'most inspirational vegetable garden 2016' by the Great British Growing Awards. It was created for the BBC series 'Kew on a Plate' on a site formerly used to grow produce for George III.

G8A1

Beyond the provision and protection of allotments, we believe more assistance is needed to set allotment holders up with the tools they need to make the most of their plot and maximise the space for food growing. Basic training should be provided to new allotment holders; an 'induction' scheme would be particularly efficient. Council and or community involvement would be required to set this up. Better management and use of allotments would enhance biodiversity and natural capital in the city, by the introduction of a variety of plants and flowers.

The intent to encourage new developments to make space for community gardening is welcome, however we would recommend stronger language around this. These spaces need proper management and smart planting; for example, wildflower beds planted around the plots to encourage pollinators would create a 'growing infrastructure' before the community has even begun planting.

Community groups and individuals should be encouraged to develop proposals for community garden schemes, with innovative proposals such as hydroponic gardens promoted

G8A2

We support the identification of space for commercial food production. We would encourage the Mayor to look to the example of Havana; the Cuban capital is an inspiring example of best practice in this area.[1] Their principle of maximising space and utilising any strip of land for commercial food production could be applied to certain areas of London.

[1] <https://www.architectural-review.com/rethink/cubas-urban-farming-revolution-how-to-create-self-sufficient-cities/8660204.article>