New London Plan EiP 2019

Valuing Garden Land

A review of evidence

London Borough of Bromley (2593)

January 2019

Introduction

This background document draws together information about residential gardens in London from supporting evidence to the Draft London Plan and highlights in particular the value of garden land in Bromley. It is submitted under the EiP Panel's Matter 64 Green Infrastructure and M66 Biodiversity.

Review of London Plan supporting evidence

Policies in the draft London Plan are supported by evidence studies and strategies. These studies and strategies issue recommendations regarding the approach which the Mayor should take to policy making, setting out the methodologies which underpin the draft policies, clarifying the Mayor's policy positions, or setting out his intention to produce further evidence to assist with the application of particular policies.

A review of the evidence and strategies identifies that the Mayor has not adequately implemented important recommendations nor published the evidence necessary to underpin the implementation of policies.

The London Environment Strategy (2018)

The Mayors London Environment Strategy aims for '*London to be the world's first National Park City, where more than half of its area is green, where the natural environment is protected, and where the network of green infrastructure is managed to benefit all Londoners'* (Chapter 5 Green Infrastructure) . The other aims relate to air and noise quality, waste & carbon reduction, and resilience to weather & climate.

The London Environment Strategy states that green infrastructure "*will become more and more vital".* It notes that garden land has a role to play as part of the "*finer grain of street trees, private gardens and increasing number of green roofs and walls" which "in addition to the core network of green and open spaces, "help to connect and extend the network*". It also specifically recognises garden land as a component of green infrastructure, defined as:

"*the network of parks, green spaces, gardens, woodlands, rivers and wetlands (as well as features such as street trees and green roofs) that is planned, designed and managed to*

Promote Healthier Living
Lessen the Impacts of Climate Change
Improve Air Quality and Water Quality
Encourage Walking and Cycling
Store Carbon
Improve Biodiversity and Ecological Resilience"

In assessing 'London's Environment Now' the strategy references GIGL 'Key London Figures' which in an assessment of the extent of London's green spaces undertaken

in 2015 estimated that just under half of London is classified as green (or blue) open space, including 14 % being private, domestic garden green space.

Environment Strategy Proposal 5.1.1.b recognises that gardens are outside of the protected space network and states that London Plan policies should ensure that development does not lead to an overall loss of green cover. The proposal advises that new development should be planned to avoid fragmentation of existing green space, include sustainable drainage systems and mitigate any loss. Specifically referencing 'extensive areas of private gardens' the proposal advises that new development proposals should avoid reducing the overall amount of green cover and, where possible, seek to enhance the wider green infrastructure network to increase the benefits this provides. The Strategy also includes a target for a 10% increase in tree canopy by 2050.

The need to protect London's green cover is particularly important in view of the acknowledged large decline in wildlife throughout London (Environment Strategy Box 9 State of Nature 2016), with garden land providing an important habitat in a context of urbanisation. Additionally, as recognised in the definition of Green Corridors, long areas of gardens can form part of green corridors which help facilitate the transit of wildlife.

The amenity and biodiversity value of garden land is implicitly recognised through proposal 5.1.1 which states the Mayor's intention to develop a "Greenness Index" for London. This will assist in understanding and addressing deprivation in access to green space and the natural environment, especially for children, particularly where development is densest, garden land more scarce and tree cover below average. The index will be based on high resolution imagery technology although it is recognised that it may not capture local variations and changes in quality. This implies that further local evidence will be required to form an understanding of the value of garden land, particularly in areas of limited access to green space and the natural environment.

Proposal 5.1.1.g of the Strategy states the Mayor's intention to provide advice for householders to improve green infrastructure, highlighting the benefits in terms of health, wildlife and the mitigation of climate change, and recognising the loss of green cover due to paving/decking of outdoor areas and the use of PD rights.

The report of the consultation responses to the Environment Strategy demonstrated strong support for the idea of turning London into a 'National Park City'. However, participants felt that this ambition was in tension with house-building targets, and many thought that one would inevitably come at the expense of the other.

"London: Garden City? From Green to Grey; Observed Changes in Garden Vegetation Structure In London, 1998-2008"

This 2011 report was produced by the London Wildlife Trust (LWF), Greater London Authority (GLA) and Greenspace Information for Greater London (GIGL) and forms supporting evidence to the Environment Strategy.

It states that front gardens, which form 25% of London's garden space have a significant landscape effect, which is being affected by the current trends relating to hard surfacing. (p.21 para 9).

The report highlights the social and health benefits of gardens, particularly in some areas of London where there is a combination of deprivation and deficiency in access to nature. It encourages policy makers to protect and improve the garden land resource in these areas (p 33 Map 2 commentary).

In terms of environmental benefits, domestic gardens are cited as one of the UK's key nature resources supporting a wide and diverse range of plant and animal wildlife, including declining species, regardless of their size or position within the urban area (p19 paras 2&6, p 24 para 9) The sheer scale of the resource (14% of London's vegetated land and 4% of its tree canopy) indicates that it is a strategically significant and important wildlife habitat (p 19. paras 5&7; p.20 para 2). There are areas of London where large gardens form continuous blocks which extent or supplement local wildlife habitats through their proximity/juxtaposition to those (p31 para 2; p.33 Map 1 commentary). Garden trees and particularly mature trees are a particularly important resource for biodiversity, as a breeding ground for birds bats and invertebrates and losses can have a significant cumulative impact (p 30 para 3).

In addition, garden soil and trees intercept rain and slow runoff, reducing the pressure on urban drains and reducing the risk of flooding, especially where there is a substantial tree canopy. Gardens also play a role in mitigating high summer temperatures, particularly where there are few accessible open spaces and a high heat index score (p 34 Map 4 Commentary).

"Gardening Matters- Urban Gardens"

This RHS report of 2011 is supporting evidence to the Environment Strategy.

It states that domestic gardens are a "*public health service for our cities*"; sustaining activities associated with wellbeing and enhanced physical fitness and mental well-being, with the effect of reducing crime, violence and aggression levels (p5).

Vegetation in urban gardens plays a strong role in moderating temperature/heat waves in urban environments through evapotranspiration with areas of garden land storing 40% more carbon than those in employment or commercial use. An increase in vegetated surfaces is desirable to control the rise of temperatures in summertime linked to climate change (p.3) 'Moderating Temperatures and Cooling the Environment).

Trees and hedges and other vegetation around houses can bring energy consumption down in winter through shelter and insulation by creating windbreaks (p.3 under "Gardens as Insulation").

The All London Green Grid

The current *All London Green Grid Framework SPG* (2012) recognises garden land as a key element of green infrastructure in London. Whilst it does not identify

projects specifically related to private gardens it recognises that deficiencies in their quantity and quality should help inform priorities in enhancing the ALGG.

Draft London Plan Policy G1 - Green Infrastructure includes the Mayor's commitment in para 8.1.3 to "*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*".

Urban Greening Factor for London Final Report

This report by The Ecology Consultancy, (July 2017) investigates the potential of using a proxy for loss of green space in the Capital. It forms the basis for Draft Policy G5 – Urban Greening.

It advises that the Factor should be used in combination with the full suite of policies strategies plans and design codes that relate to amenity, green infrastructure and biodiversity and clarifies that it would be inappropriate to use the proxy approach on an undeveloped greenfield site.

"London's Local Character and Density"

This study by Historic England and Allies and Morrisons (2016) was undertaken to inform a critique of the density matrix as set out in Table 3.2 of the adopted London Plan.

It includes the description of broad 15 character types in London at Figure 3.2 London Plan Policy D2. The map shows character types in Bromley which in the typology include reference to plot/layout (Victorian suburbs) and garden land (historic villages, 20th century suburbs), in addition to town centres, green belt and green spaces. The supporting text in para.3.2.2 indeed acknowledges that the map "*can be used to inform evidence bases for area-based strategies".* Policy HC1 supporting text notes crucially that "*today urban renewal in London offers opportunities for the creative re-use of heritage assets and the historic environment* […] *In some areas, this might be achieved by* […] *by retaining and reusing buildings, spaces and features that play an important role in the local character of an area*." (para 7.1.6).

Although garden land is not shown or included as part of the Green Spaces typology, which only includes London's larger areas of designated green space, the Local Character and Density Study notes what it describes as ' an interesting statistic' when analysing London's green infrastructure.

"*Rather than proportion of open space rising as one moves out from central London, the reverse is true. Central London has more green open space than Inner London, and Inner London more than Outer London. In suburbia, it is clear that private gardens have taken priority over large planned parks. In central and inner London, however, it is the planned parks and garden squares which contribute significantly to each neighbourhood's image*."

The inference being that the image of Outer London neighbourhoods is contributed

to by private gardens. This is clarified in the 'Key Characteristics' of Character Type 9. '20th Century Suburbs' (Bromley's predominant development type) which includes '*Generous plot sizes with front and back gardens*'.

Whist the study concludes that all character types can absorb growth "*subject to an understanding of values and existing qualities*"; it identifies that areas of uniformity such as the suburbs are the most sensitive to change. As a result, it seeks a more subtle and refined understanding and calculation of introducing considerations related to character early in the assessment process including through the London Plan's strategic policy direction, the SHLAA and a review of the density matrix of any suitable replacement based on the report findings.