

The Mayor

By email to environment@london.gov.uk

c.c. Environmentcommittee@london.gov.uk

16 November 2017

Dear Mayor,

A response to the Mayor's draft London Environment Strategy

CPRE London is the London branch of the Campaign to Protect Rural England. We are a membership based charity concerned with the protection and enhancement of London's Green Belt, Metropolitan Open Land and urban open and green spaces. We want to make the capital city a better place to live for everyone. We have over 2,500 members. CPRE London members also have a wider interest in parks and open spaces, green infrastructure and compact development.

Thank you for the opportunity to respond to this important consultation. Our comments are set out as follows:

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I. Summary response

- There needs to be much stronger measures to protect London's Green Belt and Metropolitan Open Land (more details in section IV below)
- There should also be stronger measures to protect other high-value green infrastructure like mature trees, Sites of Importance for Nature Conservation and high quality agricultural land

- We would like to see **explicit recognition that extensive housing development in low density areas just outside of London is set to add at least 1 million new car journeys a week in London's Green Belt**. This undermines the Mayor's transport and environment strategies, creating car-dependent, sprawling, polluting development just outside London while he seeks to reduce car journeys in Greater London.
- The strategy should contain clear proposals for the **Mayor to lead a City Region lobby to save London's Green Belt** and a new approach to development, transport and environment strategy which covers the whole City Region.
- We would like to see a clearer relationship between ambient noise and the green infrastructure agenda and the **strategy should recognise that one third of London's parks are severely impacted by noise**, with links to the Healthy Streets agenda.
- There should be clear **proposals to reduce or remove noise from 10 priority parks** which are severely impacted by noise. We would also like to see **ambitious proposals to re-route traffic; promote car free weekends or Sundays around parks; and introduce noise barriers**. (more details in section IV below).
- The **absence of any proposals or policies relating to light pollution** is a significant omission from the draft LES. There is a need for measures to tackle the spread of light pollution caused by poorly designed and located street and security lighting, as well as to protect and extend the already limited ability to experience dark skies in London.
- There should be a stronger **emphasis on using the Mayor's influence and networking with other urban mayors and MPs** to push for more effective action to improve air quality and other environmental objectives at the national level.
- While we welcome recognition of the need for new approaches to meeting the environmental challenges we face, we believe that **a fifth 'strategic approach' should be introduced which is focussed on the character of 'place' and place-making**, embracing local distinctiveness and a broader, more people-centred perspective on environmental quality.
- There should be a clearer **focus on the lifestyle changes needed from Londoners** to deliver the aims, including clarity on what these changes might look like, the benefits they will bring to quality of life, health and wellbeing; and in terms of delivery, using National Park City campaigns to help build public support for the measures.

- We would like to see **more focus on the use of land for food and farming** within London, including the activities of the network of city farms. The final LES should contain policies and proposals to protect and increase the capacity of London to produce food for local consumption.
- **The proposed Green Space Factor needs to reflect qualitative issues** including, ensuring safety, sustaining biodiversity, accommodating usability, encouraging sociability and ensuring coherence with surroundings. New green space and other green infrastructure should be of a high quality, well managed and accessible.
- Links to the Mayor's Healthy Streets agenda are clearly drawn in the draft LES but the final **Strategy should be more specific and set ambitious targets for Healthy Streets**, for example:
 - **for more targeted action on particular locations** beyond Oxford St and Parliament Square
 - **an ambitious target for permanently filtering out 'through traffic'** from residential streets and streets near schools and parks
 - **an ambitious approach to street closures**, including around parks.
- **The Mayor should aim to broker solutions where a Borough is trying to implement Healthy Streets measures** but where issues like the need to re-route buses or other traffic hamper delivery.
- There should be a **target to reduce land-use devoted to car-related infrastructure** and a stronger relationship between measures to reduce transport related emissions / promote walking and cycling, and the potential to liberate land currently devoted to car-related infrastructure. Also, *conversely*, measures to avoid sprawling/car-dependent development, eg. Green Belt policy, should be explicit about the positive impact on air quality.
- There should be a **focus on land-use to monitor various targets**, to ensure the more effective and efficient use of existing developed land, e.g. to manage and monitor
 - land freed up by reducing the need to travel by car
 - commitments on the protection of green space
 - use for food growing and protection of agricultural land

II. General comments

We strongly support the focus of the strategy on health and well-being, and the scale of ambition in relation to air quality improvements. We are particularly encouraged by the integrated and holistic approach that the strategy seeks to adopt, and the recognition of the interrelationships between many of the policies and proposals it sets out. While we welcome the aspirations set out in the first chapter on the key challenges facing London's environment, we believe that many of the policies and proposals need to be based on bolder and more demanding objectives if the Mayor's inspiring ambition for London to become 'the greenest city in the world' is to be achieved.

CPRE London also appreciates the open and inclusive way in which the Mayor's office has sought to draw upon the knowledge and expertise of organisations working in the environmental sector. In particular, we welcome the Mayor's support for the aspiration for London to become a National Park City and look forward to continuing to work with the GLA and others to make this commitment meaningful. We believe the proposed new London Green Space Commission will have an important role to play in assisting this and securing greater coordination between the work of environmental NGOs, the GLA, London Councils and others.

In general, we are encouraged by the more comprehensive approach adopted by the strategy and broadly support the aspirations it sets out. Apart from the recognition of the vital importance of effective action to tackle air pollution, CPRE London also welcomes the focus on addressing the challenge associated with high levels of ambient noise which the WHO has identified as second only to air quality in its impact on human health. We believe the relationship between ambient noise and the green infrastructure agenda needs to be strengthened in the final LES.

We are concerned at the complete absence of any reference to the need to tackle light pollution in the draft LES. CPRE produced light pollution maps for the whole of England, including London in 2015 – see <https://nightblight.cpre.org.uk/>. This shows that despite high overall levels of light pollution it is still possible to experience relatively dark skies in parts of London such as parts of Richmond Park, Hampstead Heath and Epping Forest. We encourage the GLA to look seriously at this issue and support the development of a more detailed light pollution map for London to help guide policies and proposals. There should be strong policies to reduce light pollution and protect dark skies in the new London Plan to promote the use of local planning and highways policies and conditions on planning permission to reduce light pollution and require well designed, pollution limiting lighting with all new development, stricter controls over security lighting, and the

replacement of highway/street lighting with full cut off luminaires. Too many new developments in London which otherwise boast of high environmental standards are completely lacking in an intelligent and environmentally sensitive approach to lighting.

We accept that the Mayor's office is limited in its powers to tackle a number of the issues addressed in the draft LES. This weakness should be addressed by a stronger emphasis on using his influence and networking with other urban mayors and MPs to push for more effective action to improve air quality and other environmental objectives at the national level. In the longer run, this should help provide the Mayor with the authority to pursue an even bolder environmental strategy.

There are other areas where the LES should be stronger, however, if it is meet the scale of the environmental challenge. For example, we believe its approach could be more effective though a stronger focus on land as an environmental resource and a recognition that land use is central to many of the challenges it seeks to address. There is a particular gap in relation to the use of land for food and farming within London, including the activities of the network of city farms. The final LES should contain policies and proposals to protect and increase the capacity of London to produce food for local consumption. These should include support for local food and farming initiatives, and monitoring the productive use of land for food.

Land use change data should be at the heart of the performance indicators that will be needed to measure progress in delivering the strategy. As well as covering productive use of land for food, we also believe that a focus on the character of 'place' and place-making, embracing local distinctiveness, neighbourhood enhancement, and environmental quality, should be one of the new strategic approaches taken to deliver the LES. The new report from the National Trust 'Places that make us' could assist here (<https://www.nationaltrust.org.uk/documents/places-that-make-us-research-report.pdf>)

We recognise that the London Plan is the primary statutory vehicle for land use policies but would like to see a stronger relationship between the LES and the policies and proposals to be set out in the London Plan. While we warmly welcome the objective in the draft LES to make more than half of London's area green by 2050, and the proposal to 'protect Green Belt, Metropolitan Open Land and publicly accessible green space' through the London Plan, CPRE London believes that this requires a much more effective approach to monitoring and intervening in the planning process than is currently the case. We address this issue in greater detail in section IV below.

Effective monitoring of delivery of the strategy will be central to its success. This will require dedicated capacity and resources within the GLA to secure effective implementation and delivery, including a regular, annual reporting framework. There is no doubt that the aims of the draft LES will require significant changes in the lifestyles of many Londoners. A clearer focus on what these changes might look like and the benefits this will bring to quality of life, health and wellbeing would help build public support for the measures that will be needed to deliver the aspirations of the LES. The following sections of this response identify some more specific comments and suggestions relating to each of the main chapters in the draft LES. The response goes on to explore in more detail under five headings how the policies in the LES could be made more effective in delivering significant improvements in environmental quality, including through a stronger focus on land use and robust policies in the new London Plan.

III. Detailed comments on chapters

Air quality

CPRE London believes that there are some other gaps in the strategy which will need to be addressed in order to help meet the Mayor's ambitions in relation to air quality. These include:

- the operation of the ULEZ charge - for example, how do we ensure that this tax that is levied on delivery vans is not just passed on to the buyer of the delivery service without having any impact on reducing the number of offending vehicles? Is it clear how many of these vehicles are on the road today and how will we the impact be measured annually to determine whether and how the tax is having the desired effect? The tax can be compared to taxes on cigarettes which are effective up to a point, but in the end people still smoke despite the taxes levied. So, the tax may be a great revenue generator but ineffective in reducing the number of offending vehicles.
- charging points—The plan for charging points (2000 by 2025) seems woefully inadequate given the number of electric cars currently on the road and the number that the Mayor hopes to see in future. We need a strategy that incorporates both public and private sector initiatives to install more charging points in convenient locations, including to allow overnight charging. There need to be stricter and more ambitious targets for the provision of charging points with new housing and other development.
- fleet conversion - the public sector fleet change over to zero-emissions seems heavily skewed to the back end of the plan period. Consideration should be given, for

example for the fleet in Central London, to have more challenging interim goals and checks, say in 2025 and 2030.

- investment in green infrastructure - The public transport strategy is based on tax, and fleet renewal, however it leaves out that better air quality can be achieved with more green infrastructure. This point is not made prominent enough in either this section or the green infrastructure section.
- road closures - we are generally in favour of short-term road closures or vehicle restrictions during periods of bad pollution. We believe that road closures should be used more widely to promote the wider benefits of reduced car use such as to demonstrate the effects on noise reduction and the ability to experience tranquillity in otherwise busy environments. The impact of such measures in terms of public perception can be dramatic. For example, there was a noticeable difference when Cromwell Road was closed on the large Prudential Bike ride in July—the absence of traffic noise is palpable and the air is clearer.
- monitoring - we are concerned that the draft strategy gives insufficient emphasis to monitoring progress against objectives and the need for stronger measures if goals are not met, such as revocation of licences and escalating financial penalties in order to encourage compliance.

Green Infrastructure

The Green Infrastructure section of the draft LES is generally well thought out and presented. We welcome the Mayor's support for the National Park City campaign with which CPRE London is closely involved. The LES could provide great clarity, however, that green infrastructure is critical to the achievement of a broad range of environmental objectives, particularly to improve air quality, and address resilience to floods and climate change. Built environment and paved over paths, squares and plazas are not conducive to effective drainage which London is likely to be increasingly susceptible to in future. Despite the welcome advances in terms of habitat creation, natural flood defences and soft landscaping in the Olympic Park, even this flagship regeneration project is failing to deliver sufficient appropriate green infrastructure in the development of new neighbourhoods.

While we welcome recognition of its importance, we are concerned too at a degree of complacency in relation to the continued loss of vital green space to new development in recent years presented in figure 21. We are also concerned about the potential risks associated with biodiversity-offsetting when this is used as a justification for otherwise unacceptable development. The commitment to make more than half of London's area green by 2050 is to be applauded but this target should be explicitly linked to accessible,

high equality and wildlife-rich public green space. For example, it should be made clear that, welcome though an expansion of green roofs and walls is to be welcomed and encouraged, this is no substitute for land remaining green and undeveloped.

CPRE London applauds the “greenness index” and its focus on helping to target areas currently deficient in green space. This index should be integrated with relevant policies in the London Plan so that it can be fully implemented from 2018 onwards, including in relation to all new build.

Consideration should also be given to green ‘retro-fitting’ of existing and recent development in areas of deficiency. The ‘green space factor’, suitably defined and applied should be used for both recent and new development, and should embrace qualitative considerations. As currently conceived there is a danger of this becoming a crude, quantitative ‘tick-box’ exercise with inadequate attention given to quality considerations. CPRE’s earlier work on a ‘green space scorecard’ – outlined in more detail below – should help address this aspect, including considering usability and sociability of this space. We approve of the “licence to green” and would like to see more detail in practice how this would work. This is explained further in section IV below.

To assist in expanding the capacity of green infrastructure, we believe the Mayor should provide strong guidance for Boroughs in the London Plan on standards for green infrastructure when making decisions on planning applications. This should be accompanied by best practice guidance in terms of green walls and roofs, solar panels, tree planting habitat creation, and permeable surfaces for better and more sustainable drainage. Planning applications that incorporate effective and high standard green infrastructure components should be privileged.

CPRE supports the Mayor’s aspirations for tree-planting and expanding the tree canopy in the city. We believe this aspiration can be reinforced with a stronger focus on maintenance and care of the existing tree resources across the capital. There is inadequate appreciation of the major contribution made by older trees to environmental quality and the need for sensitive management.

We also believe there is a case for even more ambitious planting targets. As the plan is currently configured it seems that- tree density per person would actually decline with expected population growth. We currently have approximately 8million trees for 8.7million people. The population is expected to increase by nearly 28% to 11.1 million by 2050. However, the Mayor’s strategy is suggesting we only increase the number of trees by 10%. If we are relying on trees for carbon capture and producing oxygen then surely we should be planting as many trees as population increases to remain as the

minimum at a steady state to more fully reap the many benefits that trees can bring. There should also be a clearer focus on old and established trees which make a major contribution to the extent of London's tree canopy and which are at risk of inappropriate and unnecessary felling.

We welcome the proposal to support campaigns to enable Londoners to enjoy the natural environment. As part of this, the Mayor's office could be more encouraging of schools to include 'green' projects in their geography curriculum. This should include supporting projects to encourage more food growing in school grounds and education in nutrition. There is also a need to encourage greater understanding of the landscape of London, its countryside, river systems and underlying geology and geomorphology at primary and secondary levels. Such information and understanding can help sustain and build momentum and support for London to become the greenest city in the world.

Climate change and energy

CPRE London welcomes recognition in the draft LES of the urgent action needed for London to become zero carbon by 2050. We would support the introduction of carbon budgets to help deliver the Mayor's objectives, as well as measures to tackle fuel poverty through the dedicated Action Plan, to promote decentralised, community and solar energy projects. We would also support the wider use of planning powers to ensure decisions over the design, detail, location and layout of new development contributes to carbon reduction objectives. CPRE London strongly supports the Mayor's opposition to fracking in London and the possible need for stronger policies to protect Green Belt from such development. The need for effective policies and support mechanisms at the national level is vital to achieve this ambitious agenda and CPRE nationally will continue to promote Government action to support it.

Waste

We warmly welcome the commitments to waste reduction in the draft LES. We are alarmed at the poor record for recycling in some London Boroughs and urge the GLA to do more to encourage performance improvements, including by setting exacting minimum service level targets for household waste recycling.

We welcome support for campaigns to reduce single use packaging. We would encourage the Mayor to look specifically at how he can support the introduction of a deposit return scheme for single use drinks containers, including possibly by trialling a pilot scheme within Greater London. The work of CPRE at the national level on this issue should assist in the development of such a scheme - see here for the latest on this issue:

<http://www.cpre.org.uk/media-centre/latest-news-releases/item/4693-deposit-refund-system-could-save-councils-35-million-a-year>.

Adapting to climate change

We welcome the proposals and measures in this section of the draft LES to take steps to future-proof London from the effects of climate change. The relationship between many of these measures and the proposals in the section on 'green infrastructure' should be made more apparent. CPRE London believes that the new London Plan will be an important means for promoting the proposals set out, including especially the need for stricter building standards for example to reduce water demand and minimise risks of overheating and flooding.

Ambient Noise

CPRE London warmly welcomes the focus on problems associated with noise in the draft LES. As the World Health Organisation indicates noise pollution is second only to air pollution in terms of its impact on human health. While a degree of noise is to be expected in a vibrant urban environment, there is a need for effective policy and action to expand and promote the benefits of tranquil areas with London.

Nationally, CPRE has a strong track record of promoting the value of tranquillity in a rural context. This culminated with the production of maps of relative rural tranquillity in 2007 covering the whole of England, including Greater London – see here for details: <http://www.cpre.org.uk/resources/countryside/tranquil-places/item/1839> The national scale used in this mapping exercise prevents detailed exploration of the differences in relative tranquillity across different parts of London. CPRE London intends to explore the issue of urban tranquillity in some depth in the future in ways that can help with the implementation of the proposals in this section of the draft LES, and particularly the policy to 'create and maintain quiet and tranquil spaces across London'.

While welcoming the policies and proposals in this section, we believe they should be much more ambitious through the setting of measurable targets and specific actions. For example, CPRE London will shortly be publishing the results of some research which explores the impact of noise on parks across all London Boroughs – see section IV for more details. This will reveal the extent of the impacts and propose measures to reduce it. Such measures include planting more hedges and bushes around the edges of the parks to buffer the noise from traffic. We would also support a timetabled and costed strategy for the use of noise reducing road surfaces across the network through TfL's Local Implementation Plan

CPRE London intends to explore the notion of urban tranquillity through a public engagement project and promote greater access to tranquil places in a new tranquil London project. This will include consideration of light pollution, as discussed above, and address the implications of proposals to promote the night time economy. We will also seek to promote innovative approaches to tackling noise pollution including by seeking stronger measures to control aviation noise (eg. by curtailing weekend landings over Richmond Park the early morning so you can actually hear the deer rut instead of airplane engines) and experimental road closures.

Transition to low carbon circular economy

CPRE London would support measures to encourage a rapid transition to a low carbon circular economy.

IV. Some key issues

This section explores in more detail how the how the policies in the LES could be made more effective in delivering significant improvements in environmental quality including through a stronger focus on land use. This covers the following issues:

- Driving in circles - resisting low density, car dependent development
- Traffic noise in parks - improving public parks and green spaces
- Healthy Streets - being more ambitious
- Green Space Factor - the need to reflect qualitative issues
- Protecting green space and Green Belt - need for effective action

DRIVING IN CIRCLES - resisting low density, car dependent development

Extensive housing development in low density areas just outside of London is set to add 1 million new car journeys a week - and this is probably a low estimate. Our recent research has found that 440 proposed new housing developments just outside of London, in the Green Belt, will create an additional 1 million car journeys per week, on roads which are already struggling with congestion and delays. The problem with building in low density areas is that evidence shows that these housing developments are car-dependent, even when built relatively near to railway stations.

This directly undermines the Mayor's transport and environment strategies, creating as it does car-dependent, sprawling development just outside London. The wide-scale threats to London's Green Belt will have a major impact on London and are in direct opposition to the Mayor's

transport and environment strategies - in particular the aim to change the way people choose to travel so that, "by 2041, 80% of all Londoners' trips will be made on foot, by cycle or by public transport" and the aim to tackle air pollution arising from cars.



This is intended to illustrate the difference between compact cities as opposed to sprawling cities

What's the answer? The Mayor needs to lead a City Region lobby to save London's Green Belt and a new approach to development, transport and environment strategy which covers the whole City Region. *Otherwise his efforts will be undermined and London will by default become a transport-inefficient, car-dependent, sprawling city.*

- Recent [London Green Belt Council](#) research has shown that there are now over 440 housing developments, or 163,000 new homes, proposed in London's Green Belt (mostly sites identified in borough Local Plans, so these threats are very real). Using RTPI figures below, this would lead to between 640,000 and 1,210,000 additional car journeys per week.
- In 2015, RTPI calculated in its report [Building in the green belt? A report into community patterns in the Green Belt](#) that if we were to build 1 million new homes in London's Green Belt that would result in between 3.96 and 7.45 million additional car journeys per week on roads which are already struggling with congestion and delays.
- **An underestimate?** This estimate assumes all developments are near stations, however we calculate that between 30% and 40% of the 440 proposed developments are too far from a rail station to walk or cycle. Additionally, RTPI has questioned the extent to which new residents would use trains to access jobs in central London. Additionally, data is only available for travel to work, which only represents a small proportion of journeys.

TRAFFIC NOISE IN PARKS - improving public parks and green spaces

We are mapping road traffic noise impact on parks. Initial results show that a large proportion of London's parks are significantly impacted by noise (and, presumably, pollution in many cases).

The Environment Strategy should make links between the sections on Noise and Greenspace and make a clear statement about the problem of noise in parks, and say what the Mayor proposes to do about it e.g. to reduce the impact on 10 'priority' parks by 2020? A priority park could be defined as one which is very well used but also highly impacted by traffic.

Solutions to the problem of traffic noise in parks are to be found in measures like street closures and traffic re-routing, either permanent or temporary e.g. on weekends, or other mitigating measures like natural or man-made barriers. This could involve running a competition to consider options for low maintenance, low cost noise barriers.

Examples parks and possible actions:

- **Stoke Newington Common:** Reinstating the two way system on Stoke Newington High Street, getting rid of the one-way system which currently runs straight through the common to the East. (A proposal has been in the offing ...they need to get on with it!)
- **Clapham Common** might be a good candidate for weekend or Sunday road closures around at least one side, given the appalling impact of traffic on the entirety of the space and the fact that it serves a vast residential area.
- **Finsbury Park** is massively impacted by the road to the East the A503 - just a picket fence separates the road from the park (nice, but not an effective noise or visual barrier). It could be a candidate for noise barriers given it is likely to be impossible to re-route that particular road.



The South Circular traffic through Clapham Common is unrelenting, marring the green space with noise and pollution, all day every day. The noise map below shows that the entirety of the common is badly affected.



HEALTHY STREETS - being more ambitious

Links to the Mayor's Transport Strategy and specifically the 'Healthy Streets' agenda are clearly drawn in the Environment Strategy, however *we believe the final Environment Strategy could be more specific and set ambitious targets, for example:*

- The strategy should include far more targeted action on particular locations beyond Oxford St and Parliament Square
- The strategy should include an ambitious target for permanently filtering out 'through traffic' from residential streets and streets near schools and parks
- We strongly support closures of streets and would promote an ambitious approach to street closures including around parks affected by noise and pollution, for example closing streets around badly affected parks regularly, for instance on Sundays.
- The Mayor should aim to broker solutions where a Borough is trying to implement Healthy Streets measures but where issues like the need to re-route buses or other traffic hamper delivery.

Our response to the Mayor's Transport Strategy consultation also raised some important environmental issues relating to the **Isle of Dogs / Outer East London and the Thames Corridor/ Lower Thames Crossing** which are not directly addressed in the draft LES.

We support Crossrail 2 in principle but press for more emphasis on green space protection, not just protecting SINC's 'where practicable': this wording is very weak and should be strengthened to, for example, 'except in (defined) exceptional circumstances'.

Where new transport infrastructure is provided it should be of the highest design quality to enhance the local environment and protect existing environmental and heritage assets. This should include provision of high quality green infrastructure including soft landscaping, tree planting, sustainable urban drainage, and green walls and roofs where appropriate. **River crossings must achieve traffic reductions:** otherwise new roads will simply generate more traffic in direct opposition to the Mayor's strategy. We strongly support user charging for **Silvertown and Blackwall** as well as any proposed crossing at **Barking and in the Lower Thames**. These crossings must not displace freight on rail and walking, cycling and public transport options.

We support the opposition to Heathrow expansion and believe the strategy should be stronger on restrictions on London City expansion.

GREEN SPACE FACTOR - the need to reflect qualitative issues

The proposed Green Space factor needs to reflect the qualitative aspects of green space surrounding new developments. We are disappointed that the proposed calculation does not achieve this. In 2015 CPRE London created a Green Space Scorecard - with detailed criteria for the qualitative aspects of outdoor space around housing developments, incorporating:

- **Safety:** ensuring Safety
- **Biodiversity:** sustaining biodiversity
- **Usability:** accommodating usability
- **Sociable space:** encouraging sociability
- **Harmonious design:** ensuring coherence with surroundings






The more detailed criteria and an example of how it can be applied are shown below. These qualitative aspects need to be reflected in any Green Space Factor to ensure spaces are delivering the most benefits possible. More information is available [here](#).

The criteria: Example Table with scores for the outdoor space at Brandon Estate

	Aspects to be taken into account when assessing the places	Total points
Safety	1) outdoor lighting provides good visibility after dark in all public spaces- 0p. 2) controlled height of plants ensures good visibility- 0.5p. 3) public space has non-slip surfaces- 0.5p. 4) potential dangers are nullified- 0.5p. 5) all public spaces are overseen from flat windows - 0.5p. 6) potential noise problems are guarded against- 0.5p. 7) maps of the area found at entry points - 0.5p. 8) sightlines to local landmarks help orientation- 0.5p. 9) dark alleys are eliminated- 0.5p. 10) play spaces are available next to the buildings- 0.5p.	4.5/5
Biodiversity	1) planting allows diversity- 1p. 2) native flora suited to the local environment- 0p. 3) meadow conditions to encourage wildlife- 1p. 4) some water features- 0p. 5) habitats of indigenous plants- 0p.	2/5
Usability of outdoor	1) active and passive activity zones- 0.5p. 2) play spaces, tailored to different age groups- 0.5p.	3/5

space	3) benches for caregivers at play spaces- 0p . 4) inclusive access for people with disabilities- 0.5p . 5) seating located in different areas of sunshine- 0.5p . 6) seating with armrests and backrests for the elderly- 0.5p . 7) light bicycle racks- 0p . 8) cycle paths- 0.5p . 9) dog fouling bins- 0p . 10) rubbish and recycling arrangements to best practice standards- 0p .	
Sociable Space	1) people-mixing attractors- 1p . 2) central courtyard or plaza- 0p . 3) outdoor exercise facilities- 0p . 4) benches in centripetal array- 0p . 5) flower gardens suitable for residents maintenance- 1p .	2/5
Harmonious design	1) all elements designed to fit overall building style- 1p . 2) key elements repeated to highlight design concepts- 1p . 3) accents included referring to local cultural profile- 0p . 4) disruptive built features removed or moderated- 1p .; 5) all green areas connected- 1p .;	4/5

Example Scorecard for Brandon Estate

Brandon Estate	
Ensuring safety	
Sustaining biodiversity	
Accommodating usability	
Encouraging sociability	
Ensuring coherence with the surroundings	

PROTECTING GREEN SPACE AND GREEN BELT - the need for effective action

The Mayor's commitment to protecting London's Green Belt, Metropolitan Open Land and publicly accessible green space is vital and will help stem speculative and opportunistic attempts to develop protected land. However, the reality is that saving London's protected land is going to need a much stronger and more proactive approach to policy, monitoring and intervention. We recognise that this is primarily a matter for planning policy and practice but it also needs to be fully addressed in the final LES.

Defining the purposes and functions of GB and MOL

Current policy 7.56 of the London Plan is important in that it states that "The policy guidance of paragraphs 79-92 of the NPPF on Green Belts applies equally to Metropolitan Open Land (MOL)." This should stand.

The NPPF sets out the Green Belt purposes:

1. to check the unrestricted sprawl of large built-up areas
2. to prevent neighbouring towns merging into one another
3. to assist in safeguarding the countryside from encroachment
4. to preserve the setting and special character of historic towns
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

London Plan policy should now be changed to set out *additional* functions for both MOL and GB within the Greater London boundary, these additional functions being based on the description of MOL set out in the current London Plan, ie.

6. to contribute to the physical structure of London by being clearly distinguishable from the built up area
7. to include [or have the potential in future to include] open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
8. to contain features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value
9. to form part of a Green Chain or a link in the network of green infrastructure and meet one of the above criteria.

London Plan policy should also now be changed to set out two further additional functions, to reflect the importance of the land to new challenges, not envisaged at

the time the original purposes were set out but now understood to be a critical benefit of GB and MOL, namely:

10. to make a positive contribution to the provision of ecosystem services which contribute to the management of flooding, air quality, temperature and biodiversity
11. to be available for functions outlined in (7) above BUT to serve a larger population as London becomes more densely populated.

A more strict approach to Green Belt Reviews

London Plan policy should state that GB reviews should not be carried out unless it is clearly demonstrated, with solid and thoroughly tested evidence, that urban capacity is not adequate to accommodate realistically assessed future housing needs

London Plan policy should state that

- Urban capacity must be defined both in terms of existing brownfield land and capacity for urban 'remodelling', i.e. ALL opportunity sites including redevelopment of commercial space to mixed-use; town centre redevelopment; suburban intensification; reclamation of car-related infrastructure.
- The GLA will support the borough Local Plan preparation processes to ensure a 'beyond brownfield' approach is taken to site allocation.
- It will be recognised that an allowance for suitable windfall sites will continue to be required.
- Guidance will make clear what opportunities should be included in the assessment.

London Plan Policy must also state that reviews / assessments of land should take account of all purposes and functions as follows:

- Assessments / reviews of Green Belt land must consider what contribution a site makes to all 11 purposes and functions, and this should include an assessment of what harm would be done by removing the designation, again reflecting all 11 purposes and functions.
- A site needs only to fulfil one of these additional functions to EITHER be designated as new MOL OR be prevented from being de-designated. Assessments of MOL must consider what contribution a site makes to all the 6 additional functions and any assessment of what harm might be done by removing the designation must reflect all 6 additional functions.

London Plan policy must set out steps the Mayor will take to enforce the existing NPPF policy that boroughs should: "plan positively to enhance the beneficial use of

the Green Belt [and MOL], such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."

London Plan Policy should state that

- Clear and specific proposals must be put forward as part of the Local Plan to plan positively to enhance the beneficial use of GB and MOL
- Land which has been left to become derelict should be addressed directly in these proposals, including through exercise of compulsory purchase and clean up powers.
- Where boroughs have failed to plan positively to enhance the beneficial use of GB or MOL it should be made clear that the plan is not-compliant with the London Plan

The London Plan must take a more strict approach to 'exceptional circumstances' which might justify the altering of GB / MOL boundaries. The NPPF states that "Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan." ... and that "When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."

The GLA should enhance its own capacity to assess and intervene as necessary in Local Plan processes which involve a review of Green Belt boundaries. A dedicated Green Belt enforcement unit should be established as part of the planning team in order to ensure effective implementation of London Plan Green Belt policies.

London Plan policy should additionally state that

- Alterations to GB MOL boundaries (leading to loss of protected land) will be regarded as having a major negative impact on sustainable development and a detailed assessment of sustainable development must give full consideration to the harms which would arise from developing Green Belt land or MOL (with clear reference to the purposes and functions)
- For Greater London, the need for housing, schools or other general pressures should not be regarded as 'exceptional circumstances', these not being 'exceptional' in the sense that they are not one-off needs or pressures.

London Plan policy should state that GB reviews should not be carried out unless it is clearly demonstrated, with solid evidence, that urban capacity is not adequate to accommodate realistically assessed future housing needs

London Plan policy should state that

- Urban capacity must be defined both in terms of existing brownfield land and capacity for urban 'remodelling' i.e. ALL opportunity sites including redevelopment of commercial space to mixed-use; town centre redevelopment; suburban intensification; reclamation of car-related infrastructure
- The GLA will support the borough Local Plan preparation processes to ensure a 'beyond brownfield' approach is taken to site allocation
- Guidance will make clear what opportunities should be included in the assessment.

London Plan policy should clarify what Green Belt reviews should and should not cover:

- GB reviews, and any review looking at MOL, should assess how well the GB is performing in relation to the five GB purposes and 6 additional purposes set out above
- GB / MOL reviews must not be used as a means to identify land for housing development
- An essential element of Reviews of GB / MOL should be an assessment of the harm which could be caused by its de-designation, with reference to the five GB purposes and additional 6 purposes set out above
- GB Reviews should be transparent and subject to public consultation.
- Criteria used to assess parcels of land should be publicly available and should adhere to the purposes and criteria set out in the London Plan. Boroughs must not deviate from the criteria set out in the London Plan nor seek to re-interpret the purposes and criteria.

Enforcement of Green Belt policy

The Mayor must ensure there is adequate capacity for the GLA to engage in public inquiries and oversee the implementation of Green Belt policies. This should include a **more robust approach to intervening in planning applications involving Green Belt and MOL**

- The GLA should enhance its own capacity to assess and intervene as necessary in Local Plan processes which involve a review of Green Belt boundaries. A dedicated Green Belt enforcement unit should be established as part of the planning team in order to ensure effective implementation of London Plan Green Belt policies.

- The policies relating to the purposes of GB/MOL above would apply equally to planning applications involving GB / MOL. An applicant should be required to make a thorough assessment of the harms in relation to the 11 purposes and functions above. The Mayor should ensure these assessments are carried out thoroughly.

The policies relating to 'exceptional circumstances' above would apply equally to the 'very special circumstances' which must be proven to exist by applicants wishing to promote 'inappropriate development' on protected GB/MOL. Robust Local Plan policies will be critical.

We hope these comments are helpful.

Please contact: Neil Sinden, Director (neil@cprelondon.org.uk) or Alice Roberts, Head of Green Space Campaigns (alice@cprelondon.org.uk) if you would like further input or information on any of the points made in this representation.

CPRE London
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