

Chapter 8 Green Infrastructure & Natural Environment

Overview

During the recent TCPA Seminar on the Mayor's Vision on the Natural environment and Healthy Communities (14 November 2017), participants observed that on the environment there is a general lack of will and action by the Government, lack of resources among boroughs and at best weak attention to environmental policies either in practice or in Local Plans. This vacuum makes it all the more important that the Mayor should seize the initiative by setting forward a Plan that embodies determination, a definite course of action, maximising the powers and resources that are available to the Mayor and the GLA. For example, a precept could be levied to support the necessary quality and quantity of green infrastructure required for present and future London.

In addition to this state of affairs should be added the understanding that best practical means and other important environmental principles are handed down from the Treaty of Lisbon (and not from EU Regulations) and will not necessarily be transposed automatically into UK law. This would make it all the more important that the Plan and associated strategies are instrumental and directional on the protection and enhancement of the environment.

The Mayor has statutory powers under section 30 of the Greater London Authority Act 1999 (as amended), acting on behalf of the Authority, to do anything he considers will promote the improvement of the environment in Greater London; and he is reminded of this in the Mayoral Decisions documents (in the "Legal Comments" section) that he signs. Just Space urges the Mayor to make the most of his powers, capabilities and abilities to fulfil the promises and commitments made in his manifesto and the 'direction of travel', A City for All Londoners, to make "the city healthy, resilient and fair, and making it resource efficient, low carbon and green".

Accordingly, the protective and enhancement policies, in the light of current and future development /growth pressures, including those promoted by this Plan, need to be strengthened by substituting 'must' for 'should'. The quality and quantity of the many different kinds of green and open spaces, including blue features, should be accorded value in terms of recognition, protection and enhancement.

Making London a Blue Green City

Given the interactions between different aspects of the environment, an integrated and holistic approach is needed to tackle the existing and predicted economic and population growth of London. The internationally agreed principle of sustainable development stresses that we "achieve our goals of living within environmental limits and a just society, and we will do it by means of sustainable economy, good governance, and sound science". Yet, we are

not “living within environmental limits”. London is not on track to meet even existing targets to control climate-changing emissions and is blighted by illegal levels of air pollution. Policies have not proved adequate to address the deficiency of green space, the erosion of habitat and the protection of existing green space from commercialisation and development; or that the food we consume can be healthy, affordable and sustainable.

We have seen serious exploitation of London’s waterways, overshadowed by proliferating lines of buildings, and the absence of sustainable solutions for London’s water-related environmental problems.

The Mayor should make London a **Blue Green City***, by placing value on the connection and interaction between London’s blue and green assets. The Boroughs, the voluntary and community sector and the private sector, including water companies, should be brought together to build public awareness of the importance of environmental targets such as on climate change, air pollution, protecting nature and sustainable use of water resources and provide for community involvement in the formulation and implementation of policies and programmes to ensure environmental targets are actually achieved by the dates required.

This Chapter should be retitled to **Blue Green City** and the policies adjusted to reflect this approach. This includes reinstating the current London Plan’s Blue Ribbon Network.

*The Blue Green City is common in cities of the USA. Newcastle has been selected as a demonstration city in the UK by the Blue Green Cities Research Team.

Blue Ribbon Network

Presently: London’s Blue Ribbon Network is the Thames with its tributaries, the canal network and open water spaces such as docks, reservoirs, marshes and lakes. It is an important resource for London — for transport and commerce, leisure and recreation, as well as biodiversity and as a principal component of London’s public realm. Note that the current London Plan provides for the Blue Ribbon Network (BRN) with policies that reflect its strategic importance and ensures its future protection and enhancement.

What Needs to be Done:

Reinstate the BRN policies and designate the BRN as ‘open space’ giving the waterways the status, as well as protection, of a park. River restoration is a potentially significant improvement that can have a multiple of benefits, such as amenity or flood risk reduction. Because rivers are often shared by local boroughs, the Mayor is best placed to orchestrate and resource a unified approach to their restoration.

Promoting the functional uses by passenger, ferry and freight transport and protecting it from encroachment will help sustain the BRN for recreation and

amenity. Development in the vicinity of the waterside should establish and reflect a relationship with the waterways.

G1 Green Infrastructure, G4 Local Green and Open Space, G5 Urban Greening

Green Infrastructure, within **Policy G1** and in Annex 3 Glossary, is the network of green and open spaces and green features that should be protected and planned as integrated features. This does not reference the blue element of the natural environment, a lamentable omission. Therefore, this framing policy should be rewritten to incorporate the comprehensive approach embodied in Blue Green, including reinstating the Blue Ribbon Network approach.

Make more explicit the approach for a city and people that are intrinsically connected with nature and the outdoors through coordinating, supporting and facilitating grass roots involvement to make London a greener, healthier and fairer place to live, work and enjoy. This approach is embodied within the campaign to declare London as a National Park City. While this response does not give a view on this campaigned for designation, the proposed community involvement is endorsed and should inform this Chapter.

Green Space and Infrastructure

Presently: Policies have not proved adequate to address the deficiency of green space, the erosion of habitat and the protection of existing green space from commercialisation and development; or that the food we consume can be healthy, affordable and sustainable. (See also response made to Policy G8).

What Needs to be Done:

Implement policies, proposals and minimum standards which will effectively protect and enhance the amenity, recreational and nature value of green and open space and remedy deficiencies in quantity, quality and accessibility, recognising their importance for nature, health and well-being and for amenity etc.:

Green space categorised as brownfield land (including communal green space on housing estates) needs to be protected, especially where there is a deficiency of green space. These should be designated in Local Plans and registered as assets of community value.

Proactively remedying the areas of deficiency; green space intersects with water, food growing, biodiversity and makes a contribution to reducing air pollution. Deficiencies in all functions of green space must be addressed.

An implementation strategy to ensure every Londoner lives within 400 metres (10 minutes walk) of Local Parks, Open Spaces and Pocket Parks, as described in **Table 8.1** - Public open space categorisation. This is particularly important in areas of deficiency and areas of high density living.

To counter the trend of passing public land to private ownership for public use, any Mayoral policy or proposal needs to refer to publically owned as well as publically accessible space.

Recognise that green space also includes common land (commons) held in trust for future generations.

Ensure sufficient resources for the maintenance of green spaces; encourage and support friends of parks groups that provide stewardship, not only of parks but a range of community facilities and infrastructure.

G6 Biodiversity and Access to Nature

Presently: Habitats and species – areas, numbers and populations are declining as revealed by the State of Nature Report 2016 (<https://www.rspb.org.uk/our-work/stateofnature2016/>) wherein the UK is among the most nature-depleted nations in the world. The Mayor should make greater efforts to remedy deficiencies in access to nature and green and open spaces, nature decline and funding shortfalls. A useful framing for a revised Blue Green Chapter are the aspirations underpinning the Government's 25 Year Environment Plan (<https://www.gov.uk/government/publications/25-year-environment-plan>): the goals for improving the environment and access to it, within a generation, and leaving it in a better state than found. Whilst the follow through on measures and proposals is weak, this can be remedied by a more purposeful Plan.

What Needs to be Done:

Counter any decline in species and habitat, with strengthened policies that improve designated habitat areas; enhance, increase and create new habitats; and make adaptations to the built environment so that everyone has access to nature. To achieve this, the Mayor will review his Biodiversity Strategy 2005 which is out of date and requires:

A joined up approach to green corridors, so that they are also routes for nature.

Protection of the habitat that nature relies on (e.g. hedges, woods and wild meadows) and increase pollinator-friendly planting and bee-keeping. Biodiversity-offsetting schemes should not be supported as nature does not work on a like for like basis. Any such proposal as a matter of last resort must at least require more than is lost to achieve a net gain in biodiversity.

New build and existing buildings requiring change of use should have green / brown roofs for wildlife, water retention and insulation.

TfL land should be used for habitat, as previously with the Capital Bee Line.

Both protect and plant trees as an essential part of re-greening the city. They provide multiple benefits, such as drainage, capturing air pollutants and cooling and shading.

G7 Trees and Woodlands

Protecting, especially veteran/ancient trees, hedgerows and woodlands, and promoting additional planting are supported. But, their loss should be resisted as new planting in the place of existing is often an inadequate substitute.

G8 Food Growing

Presently: This topic is not fully developed in Policy G8 commensurate with its potential for purposeful and rewarding contributions to a better environment, society and London. The proposals in Just Space's "[Towards a Community-Led plan for London – Policy directions and proposals](#)" have reached a very detailed level. See Community Food Growing and Food Production.

What Needs to be Done:

The creation and sustaining of a just food system that allows everyone access to good food and food growing spaces. It is also about granting growers long tenure-ships, not just meanwhile spaces. Food is inter-connected with London's other needs, for instance the need for housing. The proposal is to have food growing space in all new housing developments. There is also an economic need to train people for new jobs and shorten the food mileage and food chain.

At the Strategic Level

Land will be made available and protected to support community food growing and food production enterprises in order to meet the longer term goal of achieving a resilient food system and providing fresh, nutritious food for Londoners. This will contribute to enterprise, job-creation, training schemes, and London's efforts to address climate change.

There will be an increasing amount of sustainable and locally produced food consumed in and around London, through development of strategic partnerships between land owners, and urban, peri-urban and rural food growing projects. 1 [see references at foot of this section]

Food growing and production and distribution are closely related to housing, health, the economy and the environment. It is essential to adopt an approach that is intersectional, participatory and inclusive for consumers, producers and distributors. Food production provides employment and training and contributes to sustainable economic development.

The amount of land in use for growing food will be increased in all urban communities in both inner and outer London, via:

- Integration of food growing space as a requirement in all new housing developments with utilisation of green roof methods and potential for training and enterprise opportunities.

- Partnership between the GLA, Sustain, Local Authorities and established food production enterprises to identify food production sites on GLA and local authority-owned land for new entrants in the sector. This will use best practice models between local authorities and food growing enterprises.
- Career-long agricultural tenure-ships offered by local authorities and GLA for food production sites, to provide sufficient time to develop financial viability, benefits of biodiversity and community development, and soil replenishment through organic food production.

Local Authorities to foster a new generation of London food producers to work in a globally innovative urban food system by funding and supporting:

- Accredited training in organic food production.
- Paid work placements — apprenticeships and shorter-term placements (e.g. 6 months) that support (young) people to further develop skills in the work environment and provide sustainable employment opportunities.
- Associated “next steps” training — e.g. enterprise training, community development training.

The Mayor will promote and enhance the London Food Strategy. This will be implemented through the London Food Board, which will include representatives from London’s community food growing and sustainable food production sector.

At the Local Level

GLA and borough councils to integrate food production into strategic assessments, funding streams and new developments in recognition of the various benefits of the sector and positive land use activity including; access to green space, mental health, enterprise generation, training, personal development, community well-being, access to fresh and healthy food, reduction of carbon footprint in food industry.

Local Authorities must identify and safeguard land and Infrastructure for commercial food production and community gardening, including allotments, parks, orchards, schools and large commercial small scale glass houses. Local Authorities to make accessible a public register of available land e.g. park land, housing estates, brownfield sites or temporarily available sites and to administer a list of interested parties looking for land for production and marketing of food for London. 2

Food growing and food production should be considered as a priority use for public land that is underused or vacant, particularly where not suitable for housing, on a long term basis under the Community Right to Reclaim Land, (Localism Act 2011), or where not possible then temporarily (as a meanwhile use).

Food production enterprises and community gardens to partner Councils in local forums to implement the ‘London Food Strategy’ (2006), ‘Cultivating the Capital’ (2010) and the ‘Milan Urban Food Policy Pact’ (2015). 3

Agriculture land uses should be prioritised in Urban Fringe & Green Belt areas. 4. Boroughs in the urban fringe of London to provide land for development of farm enterprises and farm-to-table housing communities. 5

Local Authorities will support food producers by investment through Section 106 and the Community Infrastructure Levy, specifically to support food growing activities to take place on lands held or acquired by private bodies for 'development'. Examples include the establishment of mini-allotments in housing estates, Community Asset Transfer, and rent reduction for initial set period.

GLA and Local Authorities to independently purchase at least 15% of their total supply of foodstuffs from small-scale, nonchemical producers located in and around London by 2020, 25% by 2030 and 30% by 2036 — to increase demand for short supply chain and build sustainable local economies.

All This Requires:

Development that increases or enhances land for food production for community use will be supported. Consideration should be given to growing space that will be suitable for communities' needs, water requirements, greywater recycling for irrigation, considering sunlight and access needs. Growing space could be part of the soft landscaping strategy or part of the green space provision, or use more innovative solutions such as roof gardens.

Support should be provided to planning applications related to food growing for vital infrastructure such as large scale glass houses, cold stores, containers, packing areas. Moreover planning should consider local distribution of produce, providing suitable office space and creating local distribution hubs. Local authority planning should draw upon the knowledge of successful food growing enterprises and be part of wider strategically zoned planning that includes Urban, Peri-urban and Rural food growing sites working together to provide food for the city.

Notes and References:

1. Urban, peri-urban and rural food growing are characterised by the areas in the city, between the city and the countryside, and the countryside, respectively.
2. The city of Almere (Netherlands) is an example that demonstrates how urban agriculture can become a driver for regeneration. The Dutch University in Wageningen designed a virtual rural-urban city district called "Agromere". In this virtual district, agriculture and urban living merge with each other taking into account the need of all parties involved. This project inspired the city of Almere to implement urban agriculture in its development plans. The draft structural vision "Almere 2.0" allocates land for 15000 new homes with urban agriculture as a main element of the green infrastructure.

3. “Since food policies are closely related to many other challenges and policies, such as poverty, health and social protection, hygiene and sanitation, land use planning, transport, energy, education, and disaster preparedness, it is essential to adopt an approach that is comprehensive, interdisciplinary and inter-institutional”. Taken from the Milan Urban Food Policy Pact (2015) which was signed up to by the Mayor in 2015 and its points are to be incorporated into the enhanced London Food Strategy.
4. Around 15 per cent of the capital’s total area is agricultural land mostly in the Green Belt — less than 10% is actively farmed. (*Cultivating the Capital, food growing and the planning system in London*. January 2010 London Assembly)
5. Agriculture is one of the few land uses permitted in the Green Belt through National Planning Policy Framework (para 89) but it is often given a lower priority. See p31 and Appendix 6 — *Cultivating the Capital: food growing and the planning system in London* 2010, London Assembly.