

## TOWARDS A NEW LONDON PLAN: GREEN/OPEN SPACE, ENVIRONMENT, CLIMATE CHANGE (5.1 – 18)

*The following pulls together policies worked up by Just Space in the Community-Led Plan, Recovery Plan and Manifesto, as well as work undertaken by partner groups in the Healthy Air Coalition, Friends of the Earth and the Campaign for the Protection of Rural England. More detail can be found on their websites.*

*The numbering refers to numbers in 'Towards a new London Plan'*

**4.4 London's heritage – adding protection for London's heritage trees** Various cases have exposed the gaps in tree protection law. Nationally we are calling for the most important trees to be on a national register as listed buildings and ancient monuments are. The Mayor should create an official list of London's heritage trees as a supporting document for the London Plan.

### **5. Infrastructure, climate change and resilience**

**5.2 Heat networks.** A new LP should strongly require all new developments provide carbon calculations that include figures for environmental control. In the case of small communal heat networks that now need to be registered with Ofgem and have a transition plan, that plan should not assume carte blanche that connection to a non-site heat network will satisfy the 'low carbon' mandate. Heat owners should not be mandated to provide heat, as they may not be near to the heat demand long term. Every construction of the infrastructure for a heat network should be subject to the planning permission regime, including fit with the London Regional Energy Strategy Plan (RESP) and consideration of the implications for cooling provision. Boroughs should not proceed with awarding the rights for a Heat Network Zone without a borough wide investigation of the existing and potential heat and cooling solutions for individual homes and local communal heat networks, and would need to be subject to citizen and expert review.

**5.3 Whole life-cycle carbon (WLC) and Circular Economy (CE)** London Plan policy and guidance introduced the mandatory measurement of the Whole Life Cycle Carbon impact of major development. The next Plan needs to require non-major development to make such measurements, and to introduce initial limits on upfront Embodied Carbon, based upon sufficient datasets in the interim from the mandatory measurement now established. These limits need to be progressively tightened in the Plan via design efficiency and through optimised material selection. At the same time planning and VAT reforms need to further prioritise the reuse of existing buildings and assets while disincentivising demolition and new builds.

According to the UK Green Building Council's Roadmap evidence, the built environment is directly responsible for 25% of UK emissions, and if surface transport is included within the scope of the built environment, the total share of UK emissions increases to 42%. Of that embodied carbon from the construction and refurbishment of buildings makes up 20% of built environment emissions - so up to 10% of all carbon emissions are the direct and immediate result of construction. The carbon in a typical residential development is emitted long before the occupants even move in.

Greater London consumes 3.3m tonnes of concrete annually. Concrete emits 0.41 tonnes of CO<sub>2</sub> per cubic metre.<sup>1</sup> Consequently, the carbon footprint of concrete alone in London in 2016 was 1.35m tonnes of CO<sub>2</sub>. Over the last few decades, the process of construction has fundamentally changed very little, apart from making relatively minor efficiencies in the use of materials, and making new homes far better insulated. Modern methods of construction have simply made the technologies more streamlined, with little change to standard traditional model of building.

The only current method of monitoring this element of CO<sub>2</sub> emissions in London is through the WLCCA required of major applications. But the input into the calculations are provided by the applicants' consultants and the data is interpreted to advantage by the applicants themselves. The carbon analysis process is overwhelmingly post-design. This results in WLCCA submissions which are 'adjusted' to appear to conform to current sustainability standards. The unstated purpose of the WLCCA in the hands of developers has become the reduction of the carbon offset contribution payments due to the inherent inefficiencies in design.

Alternatives include using low carbon construction alternatives (e.g. Cross Laminated Timber), better design focused at the earliest stage in reducing carbon, enforceable Whole Life Carbon Regulations, and an enforceable circular economy policy.

**Circular Economy:** Unless a building is listed or considered to contribute positively to a Conservation Area, there is no planning constraint preventing its unnecessary demolition. Outside heritage assets, circular economy principles have no teeth in the current LP. The speculative housebuilding model maximises land values through new build, and retention is perceived to be less valuable or viable. A refurbished or retrofitted housing product is precisely not the kind of fungible asset for which there is demand. But they do make good homes and generate less carbon. The financially driven developer's simplistic cookie-cutter tall building design will always win unless and until decision-makers and their advisers are better trained, more sceptical, and better armed with clear planning policy

<sup>1</sup> British Ready Mixed Concrete Assoc. (BRMCA) 2016

which demands better design with less carbon-intensive materials, and the retention and extension of existing buildings whenever physically possible.

This could be resolved with a fundamental change to planning law, but the new LP should focus more on supporting needs-evidenced proposals and refusing speculative proposals without evidence of need which generate huge carbon emissions (speculation using CLT or similar materials may well be fine).

**5.4 Waste** London boroughs' household waste recycling rates some of the lowest in the country, which means London is paying for unused recycling collections. The London Plan should be underpinned by a waste strategy determined to deliver much higher domestic recycling rates, focused on the two interventions above; and to support re-use

The Plan should cater for expanding MRF (sorting facility) and processing capacity in particular for food, green waste, paper and metals, to reprocess waste into product or secondary material which can be re-used in the region or sold elsewhere. Plastic waste could be greatly reduced by promoting a 'milkman' / returns model i.e. promoting home delivery of food, drink and other goods in reusable containers. It should accommodate the storage and cleansing facilities needed for reuse.

**5.5 Green and open spaces** Support a change to an assessment of green and open space provision taking into account overall space available per person. This should link to policies enabling an increase in the amount green & open space available in Areas of Deficiency (AoDs) by: (a) introducing a policy to convert streets to parks (as per Alfred Place in Camden) in AoDs; and (b) policy designed to promote bringing 'landbanked' / disused Green Belt / MOL sites back into use, for example Leigh Road Sports Ground in Newham. The Plan should introduce a policy to require boroughs to identify out-of-use (protected) sites, which should be safeguarded for sports or recreation (a safeguarding designation should be created); landowners must make the site available for these uses or face CPO.

**5.6 London's open spaces.** The Mayor must require all major planning applications to rigorously meet the London Plan open space access/deficiency criteria, which is particularly vital in those boroughs ranking as most deprived or where densities are significantly increasing as a result of development. The Mayor and boroughs should use covenants to protect open space. The Mayor of London, boroughs and the London Green Spaces Commission should support the Charter for Parks which: (i) upholds the right of every citizen to have walking distance access to good quality public green space; (ii) creates a legal obligation for all public green space to be managed to a good standard (iii) embeds effective protection from inappropriate development or loss of public green space (iv) encourages and enable community involvement in all aspects of parks

London has increased its population by 50% in 40 years, and densities continue to creep up, many living in flats without gardens. The London Plan should protect and increase the amount of green public open space. Efficient design should reduce building footprints and create useable open space. We support MOL becoming a protection in its own right (de-

coupled from Green Belt) and redefined in terms of its strategic function of openness within the built landscape. A safeguarding designation should be created for sites which are known to have been used as open space or for recreational sports or recreation generally, within the past forty years; and landowners should be required to make the site available for these uses or face a Compulsory Purchase Order.

There is a national policy target to see 30% of land managed for nature by 2030 and we would like to see this 30x30 target reflected in the London Plan. London's urban forest is under threat from pests and diseases. Having a transparent supply of UK sourced & grown tree stock will help address threats of pests & disease and help boost resilience and biosecurity as well as supporting the green economy and reducing the carbon footprint of the supply chain. The London Plan should support the sector by identifying tree nurseries as a preferred land use.

Overall, London's woodland cover is unevenly distributed, and some areas have very low tree cover. This is often linked to other forms of social and environmental deprivation. See <https://uk.treeequityscore.org/>. Setting a minimum tree cover target, could be part of the London Plan, in line with the London Urban Forest Plan. These standards are challenging to meet in inner London but could be applied to the Green Belt. We would support setting a specific nature-access target for inner London.

**5.7 Green infrastructure and biodiversity** The Mayor should recognise and fund (through CIL) biodiversity as an essential part of infrastructure; ensure on-site biodiversity is prioritised over off-site; promote ecological corridors, encourage varied planting and eliminate the use of chemical pesticides and herbicides in green space and street management; implement a Biodiversity Review Panel of active citizens and specialists to co-produce and promote London's emerging Local Nature Recovery Strategy and monitor borough Biodiversity Action Plans; introduce a presumption against development of SINC; encourage Natural Capital Accounting as an evidence base and important policy instrument; acquire powers to change national regulations for London re front gardens and fund a de-paving programme. Environmental Impact Assessments should be co-produced with the community, using independent consultants, from pre-planning, scoping, commissioning to reporting, using Gunning principles for engagement

We support the proposal to take smaller green spaces into account in terms of deprivation, provided that these spaces are afforded the same protection as larger spaces.

The London Plan should designate sites for new habitat creation or food-growing to meet targets set out elsewhere in Mayoral strategies. The Plan should conduct a call for Green Belt / MOL sites to be safeguarded as future new habitat / nature reserves, beyond those already identified via the LNRS consultations; and market gardens. We support the Urban Greening Factor, which operates a point-based system for different kinds of green infrastructure. Mature trees contribute the most points in the current UGF, which is appropriate given their significant benefits for nature, climate, people and place. This is essential for higher density development. It makes sense to integrate the urban greening

factor to complement BNG. The national metric undervalues habitat restoration as opposed to new habitat creation. TLP is silent on a BNG target for London. The statutory minimum is 10% BNG but there is a growing trend of LPAs outside London having 20% BNG requirements for larger sites or all sites in their adopted plans. Setting a more ambitious target increases the chances that an average net gain of at least 10% will be delivered across the Plan area.

**5.8 Water** TLP continues the current London Plan's approach of treating water largely separately from green matters. The continued decline of rivers, water courses, water bodies and freshwater habitats will directly undermine separately treated London Plan policies on green spaces, parks, recreation, biodiversity, trees and woodlands, Green Infrastructure, urban greening, and resilience to heat.

The River Thames is London's largest open space. It is the largest piece of transport infrastructure in the UK. As the centre of the Blue Ribbon Network it had a suite of 34 planning policies in the first LP. There is currently no single policy for the Thames. As a result large sections of its banks are cut off by tall buildings, depending on which of the 13 riparian boroughs it is flowing through. This is a tragedy. In central London the LVMF provides some protection for its openness. The next LP needs a vision for the Thames and an equivalent systematic protection along its entire length within London.

TLP refers to the generally poor ecological status of London's rivers but not to how that situation has been the same for many years, with extraordinarily little progress towards Good Ecological Status (GES) under the Water Framework Directive (WFD). An updated London Plan should address this lack of progress.

Water strategy: Broadly there are many plans launched/ in development which need to be brought together in terms of action:

- The Mayor's 10 year plan for clean, healthy waterways
- The London Surface Water Strategy
- The London Climate Resilience Plan
- London's Local Nature Recovery Strategy
- Joint Thames Strategies

The London Plan should underpin recommendations in these. The consultation document also mentions the need for a catchment-based approach though does not mention catchment partnerships as an existing and longstanding delivery mechanism for these. We proposed a commitment to using existing catchment partnership networks as a way to deliver cross partner improvements to rivers (to avoid re-inventing the wheel as seems to be happening with the creation of Surface Water Catchment Groups for the delivery of the London Surface Water Strategy).

There should be universal cross-London policies that support a reinstated blue-ribbon network. This would be a positive move which would help give guidance to planners and support a more joined up catchment-based approach.

#### 5.9 The strategic importance of London's waterways

The updated London Plan should stress the need to improve water quality, although that should be in the context of the Water Framework Directive (WFD) and how to start achieving Good Ecological Status (GES) which has remained static (at best) for many years and for several London Plans.

A focus on water quality should also flow from re-concerted policy to achieve GES under the WFD, actions on which have remains static at best. A London Plan that continues to expect GES to be achieved without former policies in place to know that this is likely to occur over the plan period would not be robust.

#### 5.10 Flood risk management / 5.11 Water management

We support provision for new buildings to incorporate rainwater attenuation systems e.g. green/blue roofs, SUDS, etc. There should be clear links between commitments in/objectives of the Surface Water Strategy / other related strategies and the London Plan (see above).

De-paving of gardens, front and back. The London Plan should seek the removal of permitted development Rights for conversion of front gardens for parking. Planning permission should be required for paving of front gardens and the Plan should, more generally, promote de-paving of front & back gardens for example through requiring de-paving of gardens (front and back) as a condition of gaining planning permission for household conversion or extension of, or other works to, existing properties.

The Plan should safeguard specific green sites for the creation of largescale Wetland SUDS which can attenuate and filter rainwater from road / surface water drains. Landowners should be required to make the site available to accommodate these or face a Compulsory Purchase Order. The plan should also require grey water recycling for new buildings e.g. to supply toilet cisterns, water public gardens etc.

The plan should consider safeguarding sites for largescale reservoirs or rainwater tanks by way of planning for future water scarcity.

**5.17 Air quality** Londoners are still breathing unsafe air every day. Improving air quality is a matter of social justice. Air pollution disproportionately affects people with existing health conditions, poorer and racially minoritised communities, and the oldest and youngest in society. The next London Plan must deliver ambitious improvements in air quality - through a clear pathway for meeting WHO Guidelines, major action on traffic and

transport, and addressing exposure through heating, homes and workplaces. These can be actioned in numerous areas of the London Plan.

Firstly, we call on the Mayor to ensure that the next London Plan is integrated and aligned with a clear pathway for meeting World Health Organization targets. This means full compliance with the 2021 WHO air quality guidelines, and meeting WHO interim guidelines for annual mean concentrations for PM2.5 of 10ug/m3 and NO2 of 20ug/m3 in all parts of London by 2030 as a minimum (as already laid out in EU law). We note that WHO's guidelines apply the same limits for most common pollutants for indoor air and outdoor air.

The Mayor is committed to working towards World Health Organization guidelines for air quality, but notes that there have been implementation and monitoring challenges with Air Quality Positive guidance. This guidance should be strengthened and clarified, ensuring a safer environment both for workers at risk of occupational exposure, and local residents living in and around long-term construction projects.

**Action on traffic and transport:** Targets already set out in the 2018 Transport Strategy can deliver major co-benefits for air quality, but many metrics are off track. The next London Plan must be integrated with the MTS, i.e. put London on a path to meet a 10% increase in bus speeds by 2030; 80% sustainable modal share by 2041; and Vision Zero by 2041.

The next London Plan should also enable London to become a diesel-free city, as soon as possible. This could include tightening ULEZ standards to exclude diesel vehicles that meet Euro 6 standards; by providing further, targeted support for high-mileage fleets and SMEs to electrify; and by phasing out diesel generators to improve conditions for construction workers and those living around construction sites.

The London Plan could recommend that all London boroughs adopt progressive and sustainable kerbside strategies. These can reduce private car parking, enable shared electric mobility (e.g. car clubs, e-bikes) and power a shift from larger, heavier, fossil-fuelled vehicles to smaller, lighter, electric vehicles, for example through higher charges on the most polluting vehicles such as SUVs.

London's bridges and tunnels also need greater consideration in the next London Plan. A holistic and strategic approach to our aging river crossings is needed to enable sustainable connectivity and improve air quality.

Any extension to London's airports should be resisted. The City Airport should be decommissioned and used for housing.

**Heating, homes and workplaces.** The London Plan should discourage unnecessary burning in homes and workplaces. This includes both woodburning and the use of gas. Dedicated funding for Londoners on lower incomes to switch to cleaner appliances should be made available, and could be delivered through the Warmer Homes London scheme, alongside subsidies for energy bills.

## 5.18 Heat risk

Urban climate resilience: multiple studies identify London as particularly vulnerable to extreme heat events, which are expected to become ever more frequent as the climate crisis progresses. A recent UK Health Security Agency study found that London had the highest heat-related mortality rate of any UK region: between 2000 - 2019, there were around 800 excess heat deaths in the UK, 170 in London. Over the unprecedented extreme heatwaves of summer 2022, this figure leapt to nearly 3000 deaths, 387 in London alone.

High deprivation goes hand in hand with high vulnerability to extreme heat in London.

Worryingly, the Climate Change Committee report that UK-wide, we are failing on adaptation:

Planting new street trees, de-paving and re-greening front gardens and introducing on-street SUDS features (which also support clean rivers and reduce flood risk) are the most effective ways to keep street temperatures within safe limits during heatwaves, with trees, for example, reducing temperatures by up to 8°C.

The presence of parked cars on streets also increases air temperature and so reducing the number of privately owned cars registered in London (as per comments under Transport above) will also be critical. (There are currently 2.4million cars registered in London.)

Scientists estimate that large increases in urban canopy cover alone could cut summer heat deaths in cities by a third. London's most at-risk neighbourhoods have the fewest street trees. However, peer third sector organisations working in inner London boroughs (such as Street Trees for Living in Lewisham and Lambeth Living Streets) report major challenges identifying suitable locations for new street trees in areas with limited pavement space and lots of on-street parking - conditions which prevail in most of inner London.

The national Trees for Streets crowdfunding programme is partnered with a number of London boroughs; but all of these new trees are being installed on pavements, in most cases leaving well under 2m clear footway width - the minimum specified for pedestrian comfort and disabled access in London's Walking Action Plan. The key to increasing tree cover on London's hottest streets is to look beyond the pavement, to the kerbside/carriageway, for the space needed. This meshes with the proposals about reducing on-street parking above.



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