

All London Green Grid

Draft Supplementary Planning Guidance Comments of CPRE London January 2012

1. Introduction

CPRE is pleased to submit comments on the draft SPG for the All London Green Grid. CPRE believes it is helpful to have prepared such a planning framework in support of the London Plan, and commends the GLA for its foresight and initiative. The present draft document is of great potential importance, and it should be better known and publicised. It should create a new impetus to retaining and restoring a valuable asset.

The capital and its setting have a great variety of landscapes and open spaces. These green areas need to be better understood and better appreciated. The structure and functioning of varied landscapes has not always been well studied or considered. The new Grid has the possibility of seeing the pepper pot of open areas as a connected continuum, and as a network of fundamental importance to people. The consultation document already begins to address the concept of an integrated approach, which moves on from seeing the city as merely punctuated by green parks, surrounded by open land. We welcome this approach, and wish to be associated with such an important and basic shift of thinking.

2. Background

Protecting and enhancing the open spaces of the capital is an important objective. Green spaces and wildlife form an important part of the city's landscape and character. In this sense they already make a significant contribution to London and its sustainable development. Many of the reasons these areas have survived continue to sustain them, and these include common land, royal parks, and the Green Belt. Forest areas to the north have survived over centuries, and land on the edges of London can often be used for farming. All these areas are much appreciated by the public, and they expect good management and renewal over time.

It is important that the new policy includes a vision and a spatial framework for green infrastructure plan across the capital. It would also be helpful if there were to be a delivery plan, or Implementation Plan, that the borough councils can sign up to.

3. Policy Context

The London Plan provides for a connected network of green infrastructure. There are also other references to this under other policies. It is helpful to know that the development of this network is fundamental to the Mayor's objectives for London. Of the 6 main objectives in the London Plan, it is pleasing to note that 4 are relevant to promoting and delivering green infrastructure in the capital.

The Plan's objectives are couched in broad terms, and greenery is, of course, fundamental to life itself. It is important to note that the objectives relate to the improvement of the life of people and to the wider environment. The general acknowledgement that the provision of additional green infrastructure is a key requirement of a better life for people in the capital is also to be welcomed.

London has an ambition to be a world leader in many respects, and a similar approach to improving the environment would be of great value. The role of climate change and improving lifestyles, and human health should all be taken into account. The linkage to economic factors will also be important to people and their general outlook. The importance of accessibility and living conditions are clearly linked.

4. The Vision

We welcome the emphasis on positive action in the vision statement. This is a vision to achieve results, and to lay the foundations for action by local councils and by other bodies. The need to create new open space is essential. However, it is also paramount to retain the green spaces already in existence. Retaining open spaces requires strong policies that protect and enhance. Protection can mean avoiding loss, or it may mean resisting erosion, either in extent or in quality. Promoting variety and diversity is important, but recognition is essential for the pattern of green space that is familiar and is part of the London landscape. Connecting and interlinking open spaces is a helpful objective, but it will take time and depend on many factors.

5. Delivery Approach

The effective delivery of the Green Grid will be via partnership working. We fully understand and accept this approach. The first task is to ensure a good take up in the planning policies of local plans. However, this must be a positive approach rather than simply via 'enabling' policies that are rarely implemented. Policy provision that relies on development opportunities needs to be handled with care. These can vary greatly, and may produce new landscaping associated with new build. It may produce funds that can be combined to create the new linkages. Many will need to be closely linked to new enabling development, in pursuit of legal agreements.

The value of partnership working is clear. However, it cannot be a substitute for leadership and vision by lead partners. A pro-active approach is required, rather than a passive attitude. The Green Arc partnerships, mainly outside the London administrative area, have helped to raise awareness, but have yet to produce significant results, in terms of new provision. Voluntary arrangements, many long established, have continued to improve visitor access and connectedness.

The proposed London-wide Project Board will help to provide co-ordination and impetus. The 11 Green Grid Areas will then help to promote cross-boundary partnerships and identify key projects. One essential element will be for the partnerships to highlight suitable or potential landscape corridors and key connections that will contribute to the Open Space network. It is important not to over-complicate these functions and management structures. They need to have an oversight, but also provide facilitation and encouragement. They also need to run smoothly, and be understood by local groups and the wider public. They also need to tap into the goodwill emerging from localism and volunteer involvement.

The lead role of developing a sound evidence base can come from GiGL (Greenspace Information for Greater London), which holds the environmental records centre. The availability of good data is essential to such a project, and it must also be updated and monitored. The datasets are already considerable, and it will be important to ensure effective overall advice and information is available. The status and value of this expertise needs to be more widely understood by the parties.

6. Functions of the Grid

It will be important for the Grid to identify deficiencies as well as key opportunities. An implementation plan must be in place, even if securing improvements and enhancements take time. The Grid should ideally become a living document that evolves over time and is able to respond to changing circumstances. The Grid has many diverse functions, and some will need changes in public perception.

Climate change and adaptation is subject to a separate plan by the Mayor. This however, highlights the value of urban greening and permeability, and is an essential long term tool for flood risk management. London's vulnerability is recognised, and the role of green open spaces in mitigating impacts must be better integrated.

The draft suggests that 83,200 residential properties are currently at moderate or significant risk from flooding from rivers. 680,000 properties are thought to be at risk of flooding from heavy rainfall. These are significant dangers, which may be exacerbated by climatic changes, and the role of new green spaces needs to be more widely accepted. An expanded network of green infrastructure could help alleviate and contain flooding incidents. There are many examples of flood risk recognition built into new development schemes, such as balancing ponds, which help to contain flood waters and thereby reduce flood risk.

Access to open space has always been important to Londoners. London has some 50,000ha of accessible open space, over 1ha in size. The distribution is obviously uneven, and the Grid provides an opportunity to rebalance this. The larger parks of regional significance are bound to occur in the outer fringes, such as Richmond Park, Osterley Park, and in the Lea and Colne Valleys. These waterways are of value and others such as the Brent, Crane and Wandle could make a much bigger contribution. Redressing some of these imbalances will be a worthwhile outcome for the Grid, and ways of creating and opening up new entrance points will also be helpful.

Enhancing biodiversity is a key objective for London. There are many sites of specific value to wildlife in the capital. It is, for example, an international haven for wildfowl especially during the wintering season. London's important wildlife sites have been increasingly recognised over the years. Many people with insight and foresight have identified areas, and made the case for preservation and protection. There are now some 1500 wildlife sites in the London area that are managed for wildlife. These have some scientific value, and should be retained in as pristine a state as possible. These sites have more wildlife interest than much of the peripheral rural farmland. However, that hinterland may have amenity or landscape value and it should not be devalued or overlooked for the contribution it makes in other ways.

There are a variety of ways of improving public access to sites of wildlife importance. Much of this relates to controlled access and providing focal points and educational outlets. It would be wrong to open up all important wildlife areas to public access. Older habitats that have survived, such as Perivale Wood in west London, must be respected. They can easily be devalued by excessive disturbance. Open days and membership schemes can allow a level of access which is compatible with its scientific value. Relic areas have a special value, and the rare habitats of London deserve particular recognition, rather than condoning intrusion. Similarly, historic and designed landscapes also have a special value which should not be ignored.

Travel connections to green spaces are of use to local people and visitors alike. Better strategic links, whether by public transport or otherwise, and including walking and cycle routes can assist and facilitate public enjoyment of open space. Transport policies are key areas of the London Plan, and the present policies should link in with it. Good transport was always a way for landscape to be explored, and that tradition should be maintained and enhanced in this document.

Healthy living is another benefit to be gained from good quality open spaces. Healthy lifestyles can be encouraged via time spent out of doors. Exposure to clean open spaces can have a positive mental effect, and promote good outlooks. CPRE strongly supports the need for places of relative tranquillity, as a way of promoting healthy mental and physical wellbeing. Growing food locally can also be beneficial for reasons of health, recreation and sustainability. This is also especially relevant for areas of the Green Belt where there are extensive tracts of cultivated land, and initiatives can be taken that reflect *Cultivating the Capital* and other reports.

Landscapes and heritage assets are of central importance for CPRE, and for many organisations. Making sense of land use functions often depends on an understanding of underlying structures and geology. Patience is needed to grasp the historic value, character and quality of natural and designed landscapes. The scope and context of green infrastructure is considerable, and we consider that local and cultural identities can be helpfully fashioned by landscapes and heritage assets.

The use of ecological and landscape zones to illustrate the traditional character of areas and can help to determine the scope for improvements. We are pleased to see that the Grid intends to integrate the natural and historic heritage of London into landscape proposals. This should aim to enhance an area's distinctiveness and protect its essential character and features. Developing a sense of place is a part of this process, and we would emphasise the need to keep this at the forefront of thinking throughout the planning process.

The use of these zones will help provide the context for assessing landscape enhancement and restoration possibilities. It is important that these help to guide the restoration, and protection of wildlife habitats. Areas, such as Epping Forest and some river valleys have a historic significance, and may be contiguous with natural features in London's outer hinterland. They will provide opportunities for recreating lost connections, and particular importance should be attached to them.

We commend the initiative of Natural England in identifying London's Natural Signatures, as a framework to identify 22 natural landscape character zones. Each character type is noted, with specific landscape features accorded to it, to produce a 'natural signature'. These helpful snapshots can indicate the unique and recognisable natural characteristics of each zone. These types are combined with an assessment of the essential influences. They provide a series of design clues which can be noted and highlighted to inform planning decisions. The new Grid and its use by partner groups should be at the heart of plan making and should incorporate this toolkit. We are also aware of the many protected views, panoramas and townscapes that are identified and protected through the London Plan. Many of these extend from open parkland, such as Parliament Hill and Richmond Park, and their significance should be fully assimilated in the assessment of zones and to retain their special status.

The visitor economy is essential to London, and boosting tourism has long been an aim. Many of the attractions are part of, or in some way associated with open space. These may include historic parks and gardens, museums, country parks and nature reserves. The parks and spaces of central London contribute to its world class status and iconic recognition. The value of linking up these sites must become apparent to tourism operators. London as a visitor destination should be complemented by its historic sites as well as its parklands, like Greenwich riverside and London's Arcadia.

New visitor attractions are being created in the Olympic venues in east London. It includes the Queen Elizabeth Olympic Park as part of the new visitor offer. The creation of major new facilities should respect the existence of recognised features and designated areas. This should be a mainstay in considering the role or value of new visitor related developments. New developments should always seek to work with, rather than against landscape character and attributes. Such projects should then seek to improve and enhance the landscape connectivity and its net worth.

Sustainable design and maintenance of green infrastructure should be of the highest quality and standard. New green infrastructure must be designed and planned to fit in with existing green space. There is a need for planners and urban designers to better understand the context and presence of open green space, as a fundamental element. This recognition should extend beyond the obvious physical and recreational functions, to the wider aesthetic and social elements.

CPRE would wish to work with others on a partnership basis on good design. These may include the Forestry Commission with its 'right place, right tree' initiative. The London Parks and Green Spaces Forum is another such body. Groundwork has projects in the Wandle Valley, which is an area we have long supported. The London Biodiversity Partnership is another source of advice, and provides a forum function.

Green sector skills relate to open space maintenance, as well as to climate change. Occupations associated with planning and management of parks themselves are extensive. The green infrastructure sector in London plays a role in delivering, and maintaining a high quality green space network. This is likely to become of growing importance. The jobs and skills in these sectors are also needed to ensure that London can adapt to the effects of climate change. Skills that support carbon emission reductions and climate change adaptation within the green infrastructure sector ought to be integral to the implementation of the Grid.

Sustainable food production has obvious and well-recognised benefits for the capital. We know that land for food growing promotes better lifestyles and diets. In urban areas, community food growing projects can help build environmental awareness and social cohesion. There are allotments, community gardens in residential estates and agricultural farms on the urban fringe. These green spaces have a social function in bringing together the local community, and help to create new social links. Some 30,000 Londoners already use allotments to grow vegetables and fruit.

CPRE particularly wishes to emphasise the protection of the Green Belt and Metropolitan Open Land. Such land can be used for local food production and should be available for food production in the future. We welcome the Mayor's approach to encourage and support farming and the land-based sector in the Green Belt.

We are pleased to be able to encourage and support other partners in this endeavour. They, and we, can assist in promoting the benefits of local food, via the Mayor's Food Board and through voluntary groups such as Sustain. The Green Belt has a number of other potential productive uses, beside direct food consumption. These may include food for animal rearing and biomass production for energy and heating schemes.

Access to the urban fringe is a much treasured aspect of the Green Belt. This has the potential to give access to high quality countryside on the very edge of London. Examples of such countryside locations are notably Epping Forest, the Lee Valley Regional Park, Colne Valley Regional Park and numerous local country parks. Uses that are consistent with the open character of Green Belt or Metropolitan Open Land can produce improvements to the quality and accessibility of the resource. These must not compromise the integrity of the designations. There may be opportunities to increase access to the countryside around London itself.

Metropolitan Open Land is of great importance in parts of inner London. The chance to improve its quality and access should also be considered. This would be a clear addition to the green infrastructure network linking to London's wider countryside. We are aware of the Green Arc and its aim of providing green connections for London.

The Thames riverside spaces have much potential for expanding and extending the experiences of Londoners. The riverside settings of London include Bushy Park, Battersea Park and Jubilee Gardens. They enhance the space of the river and provide pathways and vistas adding to the sense of place. The London Wetlands Centre at Barnes provides a major visitor facility centred on the Thames in west London.

The character of these riverside spaces is ever varied, as the river flows through meadows, historic sites and gardens, to more urban central areas with embankments, through to the docklands areas and marshes in the east. There is much scope to improve this interlinked network, such as when tributaries meet the Thames. We have noted the Mayor's particular interest in this issue. These elements of the Blue Ribbon Network should be incorporated into the Grid, to help tackle climate change and encourage wildlife. There are existing strategies covering the Thames from Hampton to Kew, on to Chelsea and the Thames estuary east of Tower Bridge. These strategies should be reinvigorated by the impetus of the new Grid.

7. Green Grid Areas

We note the eleven Green Grid areas as providing the basic framework for action. These develop earlier work, and provide a London-wide approach. We believe there is a need for strategic priority in these listings. One way to do this would be to link areas in central London to the outer Green Belt. This might be prioritised on river corridors in the first instance, and link with the Blue Ribbon Network. This could incorporate a green wedge approach utilised in other cities, and in other countries.

The existing Grid areas, being the Lea Valley & Finchley Ridge; River Roding & Epping Forest; Thames Chase, Ingrebourne; and River Cray Marshes have all been extended in area and scope, which seems appropriate. New areas added are the London Downlands; Wandle Valley; Arcadian Thames; the Rivers Colne & Crane; Brent Valley & Barnet Plateau; and Central London. It is also appropriate to further identify these areas which are distinct, and may require some more detailed treatment.

Lee Valley and Finchley Ridge

There is considerable scope for beneficial linkages in the Lee Valley and Finchley Ridge areas. These cover parts of Barnet, Enfield, Hackney, Haringey, Newham, Tower Hamlets and Waltham Forest. The area includes several landscape character zones, as identified by Natural England, as well as key Natural Signatures.

The Lee Valley Regional Park goes back to the 1960s, and extends from Tower Hamlets into Hertfordshire and Essex. The park area is a green corridor through north London. We would draw attention to Trent Park in the Green Belt to the west of the Lee Valley. This includes about 400ha of meadows, woodlands and lakes. It is of considerable landscape as well as historic significance. It was once part of Enfield Chase, a royal hunting ground. There have been pressures for development in the surrounding areas, and it is essential that the context and linkages of the area are retained intact, and are subject to on-going environmental enhancement.

Epping Forest and Roding Valley

The Epping Forest and Roding Valley is another extensive and well used area including parts of the boroughs of Barking and Dagenham, Newham, Redbridge and Waltham Forest. The area has four landscape character zones identified by Natural England. The London Olympic Link will join the new parkland and local green infrastructure created as part of the Olympic Legacy, through the built area to the open landscapes of Epping Forest at Wanstead. The route is mainly urban in character, with West Ham Cemetery providing some green space in between.

The Forest, run by the Corporation of London, is of ancient origin, and has little or no agricultural value. These green and open corridors extend from the Green Belt to the Thames. It is particularly good to note that the London Olympic Link will soon be joining the green infrastructure as part of the Olympic Legacy. This is partly via built areas connected to open landscapes at Epping. This route is largely urban, with intermittent green spaces. It is vital that extensive and healthy green open spaces are seen as part of the legacy output.

London Downlands

The area known as London Downlands includes parts of Bromley, Croydon and Sutton. Charles Darwin' home, Down House is a remarkable survival of historical importance in an open landscape in Bromley. We are delighted that it is proposed as a World Heritage Site. CPRE has in the past campaigned to protect the views across the valleys, which are extensive, to Greenwich and beyond. Towards the south, the Surrey Hills AONB and the Kent Downs AONB lie just beyond the Green Belt. In places, they overlap the edge of the Green Grid Area, which confirms our point about London linking to the outer areas, and open countryside.

Several rivers in this area, including the Beck, Cray and Wandle, form corridors extending into the Green Belt. There are a number of notable walks, such as from Chislehurst to Keston, and from the Surrey border at Cane Hill, through to the Downs of North Kent. The Wandle Valley is connected via Croydon town centre to Hayes Common. In the west, it passes through built up areas, and is often only seen at the backs of houses and factory sites. Further east, it is greener and more open, with playing fields. There is much potential to enhance the wildlife value of these areas, as well as the aesthetic and recreational.

Brent Valley and Barnet Plateau

The Brent Valley is often forgotten as a riverine amenity, which touches Barnet, Brent, Camden, Ealing, Harrow and Hounslow. The river Brent's tributaries form valleys, but many are inaccessible and culverted. The river merges with the Grand Union Canal at Hanwell before joining the Thames at Brentford. There are several areas that deserve particular attention, including Perivale Wood and Horsendon Hill.

Arcadian Thames

The Arcadian Thames covers parts of the boroughs of Hounslow, Kingston, Merton, Richmond, Sutton and Wandsworth, and includes three character zones identified by Natural England. It has a character and scale which includes many areas of historic interest and beauty. The historic and royal parks should be seen within a context of conservation and improved accessibility for the public as well as for tourism.

Central London

The Central London area includes parts of Camden, Islington, Hackney, Hammersmith & Fulham, Kensington & Chelsea, Lambeth, Southwark, Tower Hamlets, Wandsworth, Westminster, and the City. The area is clearly urban, but contains many green spaces, and the contours of the Thames basin. The Thames runs through it, and is itself a defining feature of environmental importance. The Thames Path has become a well used and attractive amenity along the river frontage.

South of the Thames, there has been extensive suburban development over two centuries. Remnant semi-natural landscapes survive mainly as common land and as recreational areas. These include Battersea Park and Clapham Common, and these areas should be allowed to retain their authentic character and visual amenity.

8. Glossary

Entries in the glossary are helpful as reference. This should cover references to the Metropolitan Green Belt and to Metropolitan Open Land. There has often been confusion in the public mind about the true nature and recognition given to such strategic designations. A clear distinction between environmental and planning designations would be of value. A fuller description would be helpful in the context of the Grid, and could be quoted in formal planning submissions or at public inquiries.

9. Conclusions

CPRE London is much encouraged by the approach taken in the Green Grid draft. The underlying objective of linking up and connecting open green areas is of fundamental value. This value extends to wildlife conservation as well as amenity purposes. It can also exert a landscape and scenic importance on significant areas of the capital. The planning value of protected views in London is something CPRE has long championed. We consider that the Grid must initially concern itself with the retention of existing character and amenity and then consider enhancement. The creation of corridors and links will provide its own improvement. Character and the familiar local scene are important to people. We would not be encouraged to see bland green areas devoid of wildlife, for example, just to meet the needs of flood risk management. We broadly and generally support the draft, and wish to see it implemented. We would also offer what support we can as a partnership body, with the encouragement of our members.

Prepared by Edward Dawson