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Dear Mr Livingstone

**The London Plan Draft Supplementary Planning Guidance:
East London Green Grid Framework**

Thank you for the opportunity to comment on the Consultation Draft of your Supplementary Planning Guidance for the East London Green Grid. This response is from Groundwork London, the Regional Office of Groundwork UK with the federation of Groundwork Trusts serving Greater London. It relates to our recent comments on your proposed Further Alterations to the London Plan.

The context for our comments

As a leading UK-wide regeneration organisation supported by central Government to build sustainable communities through joint environmental action in areas of need, it is central to Groundwork London's own strategy to support appropriate policy developments in partnership with regional and local governance. We are therefore working with the GLA, other statutory agencies and the voluntary sector to help to shape and deliver relevant aspects of your London Plan.

Our contributions have included establishing and initially resourcing the London Parks & Green Spaces Forum, supporting and helping to fund your Strategic Parks Report, and leading the SAUL (Sustainable & Accessible Urban Landscapes) Partnership in North West Europe, which includes London open space projects within the Green Grid areas. We have fourteen years practical experience of successful green space and waterways projects with Boroughs and local communities in regeneration areas, including many large-scale interventions in East and South East London and the Lea Valley.

We have supported the Green Grid concept in London from its inception. We believe it is a good exemplar for the growing recognition, nationally and internationally, that *green infrastructure* should play a vital part in wider strategic planning for economic competitiveness and social well-being. ***We therefore welcome the provision of Supplementary Planning Guidance. It can provide a good basis for continuing to build on the planning work of recent years.***

The following comments refer to the Draft headings and numbering.

1 Introduction

Para. 1.1 This key paragraph describes the aims of the Green Grid (GG) in connecting “*town centres, public transport nodes, the countryside in the urban fringe, the Thames, and major employment and residential areas*”. However, these links do not seem to be explicit from either the paragraphs that follow or from the later descriptions of the six locations chosen, which seem to be typically more remote locations identified for improvement. ***We suggest this point should be clarified.***

Para. 1.2 The complementary links between GG and other strategies and initiatives, including Green Arc, are identified. ***We suggest this paragraph should also specifically refer to your London Strategic Parks Report***, commissioned from EDAW by the London Plan Team (with other key partners including Groundwork) and published last year. This contained a thorough review of deficiencies in provision of regional and metropolitan parks based on the London Plan, identified the range of functions of strategic open spaces, set out criteria for evaluating potential major parks spaces including chains and grids, and considered a range of possible models for delivery and management. Green Grid locations were included in the areas of search.

Para.1.3 This refers to the Further Alterations to the London Plan. In our response to the FALP, we welcomed the recognition that London’s open space network provides a green infrastructure that performs a wide range of functions. ***It would be advantageous to state in the Introduction*** that the concept of green grids is not exclusive to East London and is of wider relevance to London as a whole; but that the East London GG offers a key opportunity in the context of other regeneration plans for the Thames Gateway and the 2012 Olympics.

Para.1.6 On the intention to produce a companion Delivery Plan, it should be clear that a wide range of partners and stakeholders will also need to be involved in it. ***Proposed arrangements for updating it should be indicated.***

Para. 1.8 ***The representation of all GG Boroughs’ interests on the Project Board should be clarified.*** Consideration should be given as to whether Groundwork London, as a Government sponsored agency with a pan-London role, might usefully be co-opted.

2 Making the Green Grid Happen

Para. 2.2 This anticipates that, as well as adoption in Borough LDFs, GG will be delivered through strategic projects. ***It would be helpful here or in later paragraphs to clarify what these projects will be and how they will be selected.*** We welcome the emphasis here (and in para. 11) on the need for future management and maintenance.

Para. 2.3 In addition to defining and embedding GG in these identified statutory instruments and planning policies, ***it would be advisable to mention mechanisms that have budgets attached to them.*** For Boroughs, Local Area Agreements are likely to be the most fruitful opportunities. The White Paper’s introduction of Multi-Area Agreements could offer an opportunity for several Boroughs to link their GG plans to CLG targets and resources.

Para. 2.4 We agree that strong and open working relationships with many partners will be key to delivering GG. ***We are surprised that Groundwork London has been omitted from the list of strategic partners here, and would wish to see that amended.*** The separate reference later in this paragraph to delivery organisations should remain, but we suggest it should there refer simply to “Groundwork”.

Para. 2.6 This paragraph could be taken to mean that the Project Board is responsible for funding. **The term “harnessing” should be clarified.**

Para. 2.7 **We suggest that this statement should be revised.** It appears to suggest that the (statutory) Lee Valley Park Authority and the (voluntary inter-Borough) South East London Green Chain are the same kind of organisations, which is not the case. As the Strategic Parks Report pointed out, it would be unwise to imply that the unique LVRPA arrangement offers a model for others. Apart from the difficulty of getting any such legislation through Parliament, the all-London precept on Boroughs is deeply unpopular with many, who have their own open space priorities. The Report, however, also recognised that there are other kinds of delivery mechanisms (e.g. the established Colne Valley Park, the proposed Wandle Valley Regional Park, both Groundwork-led partnerships) that can be acceptable to Boroughs and the voluntary sector.

3. Green Grid Vision

Para. 3.1 ***This description of open space ingredients should also mention spaces in and around housing areas.*** A linkage reference here or elsewhere to the London Neighbourhoods Green project might be helpful (social housing sector and Groundwork on issues of green space within estates).

Para. 3.3, 3.4 It would be helpful here or elsewhere to say more about how these themes and opportunities can be realised. For example, ***the welcome commitment to building community capacity for change also needs mechanisms for achieving it.*** There are many good examples of successful land based projects that have demonstrated the value of engaging local communities as stakeholders and active participants throughout the planning, design and delivery. The skills and expertise needed will include, for example, health services, schools and the business sector.

Benefits of the Green Grid

Para. 4.1 We suggest that ***the reference to social benefits should also refer to wider community benefits,*** both from active engagement in the process of change and from the results, and might include fostering a sense of place and promoting social cohesion.

SPG Point 6 We suggest more emphasis should be placed on ***the integration of economic, social and environmental benefits to ensure they are always approached holistically, with targeted interventions to achieve it.*** With that in mind, the list of disciplines and expertise will need to be widened to include social and economic players, not just those concerned with physical changes.

Climate Change and Flood Risk

Paras. 5.1 – 5.4 We support the focus on the relevance of GG to climate change issues.

6 Public Open Space

Para. 6.6 This section draws on the issues identified for regional and metropolitan parks, addressed by the London Plan and subsequently by the Strategic Parks Report. Consequently, paragraph 6.6 refers exclusively to 'parks'. *In the GG context, it would be helpful to mention other forms of open space and to distinguish between different types of 'park' – for example, pocket parks, space between housing units – which were not addressed in the references above.*

7 Access and Connectivity, 8 Biodiversity

Paras 7.1 – 7.2, and 8.1 – 8.3 We support the inclusion of these sections.

9 Health and Physical Activity

Para. 9.1 The statement in the second sentence should be amended. *The Matrix was developed by the Greening the Gateway Partnership's sub-group on Green Infrastructure and Health.*

SPG Point 11 It would be helpful to include a reference to *uses suitable for all age groups, abilities and backgrounds*. In the light of the extensive work and expertise now being developed in this field, including the work of the Well London Alliance (London Health Commission, Groundwork, YMCA, LSx and others), *we would also like to see an expectation of implementation in partnerships with other agencies and the voluntary sector included here.*

10 Green Grid Areas

Para.10.1 We confirm our willingness to play a part in supporting the development of the six GG areas in partnership with other regional agencies, based on Groundwork London's strategic planning roles, and on our sub-regional and local capacities to work in all of those areas in partnership with Boroughs and communities. We have previously been an active player in some delivering elements of them.

Paras. 10.2 onwards In identifying the potential elements of each GG area in more detail, the impression is currently one of primary focus on infrastructure improvements, river regulation and conservation. It will be necessary to balance this with references to the other kinds of ingredients, potential uses and advantages of a GG approach, identified earlier in the SPG, including education, health and well-being, and climate change factors. All will have potential for involving the business sector, particularly those on industrial estates, many of which are located on river corridors.

Paras. 10.10, 16, 22, 28, 34 and 44 We will be interested, in particular, in the series of 'strategic open space opportunities' identified for each area. They are likely to need a joined up inter-agency approach, and in some cases might lend themselves to inclusion in wider strategic programming initiatives, possibly also as part of future transnational partnerships. We would therefore wish to look at these from a regional development perspective, as well as opportunities for sub-regional delivery.

We shall be pleased to discuss any of the points in this response.

Clive Fox
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