

Morgan, Jackson

From: John Sadler [REDACTED]
Sent: 23 May 2024 14:07
To: Environment - Local Plan
Subject: CPRE London comments on City of London Local Plan Consultation
Attachments: CPRE Comments City of London Local Plan 230524.docx

Categories: CONFIRMED

THIS IS AN EXTERNAL EMAIL

Hi there,

Please find attached CPRE London's comments on the current City of London Local Plan Review Regulation 19 Consultation.

Many thanks and kind regards,

John Sadler
Campaigns Officer
CPRE London
70 Cowcross St, London EC1M 6EJ
www.cprelondon.org.uk
@CPRELONDON





Local Plan Team
City of London Corporation
Guildhall
Aldermanbury
London
EC2V 7HH

By email to: localplan@cityoflondon.gov.uk

23 May 2024

Dear Sir/Madam,

Local Plan Review Regulation 19 Consultation

CPRE London is a membership-based charity with 2500 members across London, concerned with the preservation and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners.

Thank you for the opportunity to provide comments on this important consultation.

Overall, we support the Plan's environmental policies including the commitment to ensure that the City is environmentally sustainable, transitions to a net zero carbon City by 2040 and delivers urban greening and greater biodiversity. However, the Plan should be more ambitious about creating new streetparks and rain gardens as well as planting more trees across the borough where appropriate. The City of London should also address amenity green space needs *per person* when assessing outdoor / green space.

Strategic Policy S14: Open Spaces and Green Infrastructure

We strongly support the Plan's commitment to protect existing open and green space and seek the provision of new open and green space through development, public realm and transportation improvements. The Plan should address green space needs in terms of green space per person to reflect any deficiency which may be created through high density work environments and more generally to ensure there is enough green amenity space. We support the Plan's intention to create additional publicly accessible open space in and near to areas of open space deficiency such as the riverside. 'Streetparks' can be created from 'grey space' i.e. superfluous roads should be converted to accommodate new rain gardens, pocket parks or whole or part of a street converted to a 'streetparks' as has been done at Alfred Place in Camden.

Policy OS5: Trees

We support the Plan's Requirement to retain existing mature and semi-mature trees and encourage additional tree planting to be integrated into the design and layout of developments and public realm improvements. However, we believe the wording of the policy could be stronger for example the word 'encourage' could be replaced by 'require' and a detailed map of tree deficient areas should be created to ensure developers and the City of London Corporation plant more trees in the correct places. One example of where additional tree planting would be beneficial is around Bank junction where there is currently a severe lack of tree cover and urban greenery in general.



Strategic Policy S15: Climate Resilience and Flood Risk

We support the Plan's commitment to ensure buildings and the public realm are designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. Strong policies are needed to promote management of rainwater on site of new development, taking rainwater from roofs into ponds or wetlands or for grey water recycling for buildings; and via changes to existing buildings, for example by requiring SUDS planters, water butts, dual aspect buildings (to promote through draught), appropriate insulation, shared / sustainable energy etc.

Promoting better use of many hectares of public kerbside space in the Local Plan

A significant proportion of land in the City of London is public road carriageway. This space is increasingly needed for all kinds of green and active and sustainable travel infrastructure*. The Local Plan should propose, or at a minimum be underpinned by a proposal to, re-allocate of land-use for at least 25% of the City of London's carriageway space – referencing environmental, transport and health goals and establishing an appropriate target for reinstating kerbside as a public space.

*Kerbside space is needed for bus and cycle lanes, cycle parking (secure, hire and visitor), shared mobility parking (including car share), delivery hubs, rain gardens, tree planting on build-outs, EV charging points on build-outs, parklets, pocket parks, play on the way features/play trails, and whole streetparks (e.g. as per Lambeth Council's [Kerbside Strategy](#)).

Thank you for considering these points.

Yours faithfully,

John Sadler
Campaigns Officer
CPRE London