

GLA Environment Review
Questions seeking written views and information
Responses by Friends of the River Crane Environment (FORCE)
September 2015

Friends of the River Crane Environment is a charity, founded in 2003, with over 500 members and a remit to preserve and enhance the community and environmental value of the River Crane corridor www.force.org.uk. The River Crane provides a 30km green corridor through west London, running through five London boroughs and managed by the Crane valley partnership www.cranevalley.org.uk. CVP has around 30 members including the GLA and all of the five boroughs. It is considered to be an environmental and community asset of London wide importance – albeit its value is currently far from optimised.

1. What do you see as the most significant environmental impacts and implications of London's growth over the coming decades? You may wish to consider:
- a. Energy supply, demand and distribution

Not relevant to our objects

- b. Water management (water demand, water supply, waste water management, and managing rainwater and flood risk)

Those matters that are relevant to our objects are also covered in (c) below

- c. Green infrastructure (green space and waterways, urban vegetation, natural shade, sustainable drainage, green roofs, biodiversity and habitats, etc.)

This issue is very relevant to our core purpose which is to – protect and enhance the environmental and community value of the River Crane corridor

If you could provide or point to specific evidence or evaluations that would be very helpful. Views and information about pressures and impacts varying across London, or in specific parts of London, are welcomed.

The needs and requirements of the Crane valley have been addressed in the Crane catchment plan and the ALGG Area 10 report. The valley has considerable value and much greater potential as a green asset – from an environmental, community and green transport perspective for example. This value is being developed by the CV Partnership with support from the GLA's Big Green Fund and TfL cycle funding for example. There are though considerable pressures due to:

- *Development and urbanisation pressures – FORCE has been liaising on around 20 major development proposals within or adjacent to the River Crane corridor over the last five years. This trend is likely to continue and grow*
- *Pollution – including both pollution events and chronic pollution problems. The Crane has suffered two major pollution events in the last five years that have effectively wiped out the ecological value of the lower part of the river (below the pollution inflow point). It is also subject to around a dozen more minor events every year and chronic background pollution from misconnections and urban road run-off for example. Under these circumstances it is remarkable that the river continues to function and that fish, kingfishers etc have returned to it over the last 12 months*

- *Local government funding reductions – the management and protection of these linked green spaces rely critically upon local authority actions. In recent years the setting up of the CVP has allowed LA's to appreciate more fully how the River Crane system operates across borough boundaries and to work together to protect and enhance its value. However, given this work is largely non-statutory in nature, it is particularly vulnerable to funding reductions and the value being lost.*

The CVP is seen as a valuable structure by all participants and some funding has been provided to support the core needs of the organisation. This is though not really sufficient to do much more than hold the fort at present and it would benefit from being put on a more sustainable long term footing so as to help deliver on the potential of this major green asset.

2. How, and how well, do London's current plans and policies manage the environmental impacts of its growth? What tensions or difficulties are there within or between them?

The plans and policies have been helpful. We do have a major concern about the policies around brown field sites and how brown field is defined. In an urban context virtually all green space can be classified as "brown field" given that at some time in its history it has been developed for some purpose – and some of the most valuable and highest potential parts of the capital (from a green infrastructure perspective) are also seen by many as brown field land.

The developing strategy for green infrastructure is welcomed. From our own experience we know that many parts of green infrastructure that have a dormant community value (and less than optimised environmental value) are not recognised as such by developers and councils. We believe that as Londoners use local green spaces more their importance and value will grow. However, that very growth in use and importance will risk compromising their value unless these spaces are better linked to each other and more spaces can be saved before it is too late.

The London Ecology Unit produced excellent reviews of green assets at a LA level and there was a considerable amount of regional and local designations undertaken at the same time. This process has not been revisited in any substantive way since.

The London Regional BAPs and many local BAPS performed a similar function ten years ago – and again have not been sustained in the medium term.

London has great need of something at a regional level that brings together and builds upon these works – and is able to recognise and optimise the value of the capital's green assets.

3. How do policies and processes at the national and local levels help to manage these impacts? Again what tensions or difficulties are there?

Again local authorities often have good policies in place on green assets – however, they are not always implemented. LA environment staff are over stretched and do not either see (or have the time to respond to) the opportunities for improvement and enhancement that are available. The same can be said for the Environment Agency.

The emerging catchment partnerships may provide a means of co-ordinating the activities of all the interested parties, including LA's, national and regional agencies and the third sector.

4. What new or different ideas and approaches could improve London's strategy? Are there examples from other parts of the country or the world?

If you could provide or point to specific documents setting out these ideas or approaches this would again be very helpful.

There is scope for strengthening the role of the partnerships such as CVP that already exist. It is not clear to FORCE what the most effective structures might be for operating such partnerships – but the example of CVP shows they can be very effective in generating plans, projects and funding with very little funding support. There are a number of different models already operating in London and it would be very helpful to review and appraise these. This may well be something which is already being done by DEFRA in regards the catchment based approach.

FORCE considers the ALGG to be an extremely valuable baseline structure – which now needs funding and teeth to be more effective on the ground.

5. What should be the focus for the 2016-20 Mayoral term in improving and taking forward London's environmental plans for the following decades?

Consideration could be given to the development of the infrastructure plan, the green infrastructure network, the Environment Strategy and the London Plan.

Identify the best means of providing green infrastructure support at a London wide level and then fund it in line with its value to the capital. Often the policies are in place but the actions on the ground do not deliver them – largely because there are not the people nor effective levers to do so.

Strengthen the ALGG partnerships and consider the most effective structures for delivery – potentially link these with the emerging “catchment based approach” coming out of DEFRA.

Do not lose all the good works done through the LEU and BAP groups – find a means of capturing and storing these data and providing them as a baseline to be built upon

Review the definition and value of brown field sites. In relation to community and environment – considering both actual current value and potential future value.

Explore means by which the environmental value of the capital can be protected and enhanced as the population grows. What mechanisms can be utilised to co-ordinate activities, disseminate and replicate good practice and bring in funding – particularly for resources that cross borough boundaries.

Promote the masterplanning approach to green infrastructure so that it is recognised and its value optimised in the planning process. Ensure that new development has an obligation to provide net improvements to the environmental and community value of surrounding local open spaces – in line with the green infrastructure masterplan.

Promote more effective collaboration between the key parties in identifying, prosecuting and publicising pollution problems that effect green spaces