

London Friends of Greenspaces Network (LFGN)

The London network for the 600+ Friends and User Groups for all green open spaces

www.lfgn.org.uk

*Protecting and promoting green spaces * Improving and enhancing the quality of green spaces*

*Expanding the amount of green space generally * Improving staffing and management*

Seeking adequate resources for green spaces (capital and revenue)

Ensuring the involvement of Friends/Users groups as partners in the management of their parks & green spaces

1st March 2018

To the London Plan Consultation Team

I am writing on behalf of the LFGN to respond to the draft London Plan consultation.

- The first section A, below, is a number of contextual points.
- The second section B is a summary of some of the key themes regarding changes sought.
- The third section C are specific amendments/wording sought.

A. SOME CONTEXT

1. The Friends Groups movement The LFGN is the voice of the dynamic and inspirational grassroots movement of over 600 local Friends of Parks groups - the volunteers who act on behalf of the communities who use and care about our vital public green spaces throughout London. The Network exists to support and represent Friends Groups' activities, issues and concerns, and to amplify their passionate and knowledgeable voices. We promote the formation and development of strong Friends of Parks Forums for every borough working in partnership with Local Authorities and parks management. The LFGN is the London Region of the National Federation of Parks and Green Spaces, representing the Friends Groups' movement throughout the UK. The LFGN Chair also currently chairs the NFGS, and sits on the Government / Greenspace Sector liaison body, the Parks Action Group.

2. What do our public green spaces require, and what do the public expect? Every green space should have the management and maintenance it deserves to enable the local community to enjoy its many benefits. With an increasing population and rising obesity levels amongst London's children, public parks are needed more than ever and should be expanding rather than shrinking, and improving rather than deteriorating.

3. The current situation Our much-loved parks and green spaces - around 3,000 throughout London - are recognised by all to be massively popular and essential public resources providing an unparalleled range of vital services and facilities for all sections of our communities, and for nature. But their future is under threat due to Government cuts to local public services. This serious underfunding crisis shames us all throughout the capital and needs to be addressed and reversed immediately by all tiers of government. There is also a related and increasing threat of inappropriate development in and around public green space, and the spread of commercialisation undermining the integrity of such spaces as public resources for all to enjoy freely. The coming declaration of London as the world's first National Park City is an unparalleled opportunity and must act as a driver to ensure that real action to improve policies and funding is taken now.

4. Policies Policies and programmes abound aiming to recognise, protect and enhance London's open green spaces: the London Plan's all-London Green Grid; London's Green Infrastructure Report; Spatial Planning Guidance - Preparing Tree and Woodland Strategies; Fields In Trust covenants; the Green Flag Awards, London in Bloom awards; Metropolitan Open Land and other designations, and the commitment towards London being declared a National Park City. Such policies are welcome, but on their own clearly inadequate in response to the growing green space crisis. Major threats and accompanying public uproar regarding open green spaces are increasing throughout London – parks, sports fields, nature reserves, woodlands and cemeteries etc, eg cuts in parks' staff and maintenance, increasing inappropriate commercial usage & even loss of sites or parts of sites to development.

5. Pledges The Mayor's election manifesto included pledges to: Protect nature and play space; Protect the green

belt, green spaces and play spaces; Prioritise development on brownfield sites; Strengthen protections for open spaces within the London Plan, including playing fields, Metropolitan Open Land, Sites of Importance for Local Nature Conservation and nature reserves; Protect wildlife and biodiversity by creating green corridors through the city; Make London the first 'National Park City'; Set a long term target to make more than 50 per cent of our city green and ensure that all children have access to nature. And the previous Mayor's Green Infrastructure Task Force final report concluded that green infrastructure must be considered as essential as the city's transport, energy, water, waste and digital infrastructure. But to achieve this we need effective action now at every level.

6. Effect Do London's policies actually address the real facts on the ground? We say, in the light of what's happening throughout London, green space policies must be strengthened, sharpened, expanded and then nailed down with more detail to ensure they are implemented effectively.

B. SOME THEMES OF THE CHANGES SOUGHT

We are pleased that the draft recognises the importance of green spaces but policies need to be much stronger to give them adequate protection.

7. Strengthen the protections for all categories of public green space. Adopt the new and additional Local Open Space criteria as set out in the NPPF, making it easier to implement and therefore ensuring that such spaces receive the same level of protection as MOL. Protecting the Green Belt requires stronger enforcement. It should not be possible to 'swap' designated Metropolitan Open Land. Policies are needed to drive up the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows. Informal and formal outdoor sports facilities, including for ball sports, should be protected, expanded and enhanced.

8. Address deficiency. London Plan open space access/deficiency (Table 8.1) criteria need to be enforced in all Borough Plans. Green space provision is essential infrastructure and therefore an imperative, not something to be 'balanced' against other policies eg additional housing. It should not be possible to 'swap' designated MOL.

9. No substitute for public open space. Whilst wider green infrastructure (green walls and roofs, street trees etc) is important it should be made explicit that this can't be used as a substitute for easily-accessible public green spaces.

C. SPECIFIC AMENDMENTS SOUGHT TO LONDON PLAN CLAUSES

10. G1 We welcome Policy G1. We propose to add to G1B at the end: '**Green space expansion targets should be set for each borough, and monitored annually.**'

Additional para 8.1.4. '**In order to achieve the Mayor's target of increase of green cover/space from 48% to at least 50% of London by 2050 (a 4% increase) each borough should set specific and monitorable targets, to achieve that in their borough by 2050. Green Space Opportunity Zones should be considered, eg to apply in 'regeneration' areas, to ensure green space policies are strengthened further in those areas, especially where more homes are being built and therefore more public open space is also needed to serve that area.**' [See also para 8.4.3 proposal, below]

11. G2 We welcome Policy G2 and particularly the proposal in Policy G2B that 'de-designation' of Green Belt will not be supported. This policy needs to be reinforced for it to be effective.

Proposed change: A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in **policy G2B** so that it reads: '**The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt**'.

Rationale: The release of Green Belt land is being proposed in numerous locations across London. There is a need for an increase in capacity to enable the GLA to follow up this commitment and to object effectively to any

proposals for Green Belt release. Unless strongly resisted, the loss of Green Belt will seriously affect the ability of the Mayor to realise his ambitions for protecting and extending existing green space.

12. G3 We welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow 'land swaps' because MOL is characterised by its 'permanence'.

Proposed changes: Policy G3 C should be deleted along with the sentence in **paragraph 8.3.2** "The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy". Policy G3B should be amended to read: **'The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.'**

Rationale: The protection of MOL should be supported unequivocally to help realise the Mayor's ambition to increase green space. 'Land swaps' undermine this because: The unique location and qualities of MOL are irreplaceable; They undermine the 'essential characteristic' of permanence, as set out in paragraphs 79-92 of the National Planning Policy Framework (NPPF), which as stated in paragraph 8.3.2, applies to MOL as it does to Green Belt; The proposed policy states the MOL resulting from a swap should meet 'at least one of the criteria set out in Part D', which could easily be read as 'only one of the criteria'. This means the resulting MOL is highly likely to be qualitatively considerably less valuable; The principle of land swaps creates a loophole that will be exploited by developers and others in ways that reduce the contribution of MOL to quality of life in London.

The open nature and environmental qualities of MOL are constantly being eroded by damaging proposals for inappropriate development. Strong policies are required to halt such speculation and opportunism, rather than policies which suggest that it is acceptable to build on this land even if lesser quality MOL is created an unspecified distance away.

13. G4 We welcome support for the creation of new areas of accessible green and open space. These provisions should be strengthened by requiring measures in Policy G4 to improve the quality of green space.

Proposed changes

- **Policy G4 A** – add at end: '...with a presumption against loss of part or all, or change of use'.
- **Policy G4 B** – add at end: '...deficiency in access to **good quality** public open space'.
- **Policy G4 C** – should read "**Assessments should identify areas of public green and open space deficiency, including size and accessibility, of the relevant character eg. nature sites, sports provision and play equipment, and an assessment of deficiency in quality, taking account of Green Flag criteria, noise and air pollution, and** using the categorisation set out in Table 8.1 as a benchmark for all the different types required." Add: '**All Boroughs and local Development Plans should seek to upgrade the status of all the public green spaces within the boundaries of the area, and to promote widespread adoption of the Local Green Space designation where possible, as set out in the NPPF.**'
- **Policy G4 A** – add word to first line: '....should be resisted **especially** in areas of deficiency.'
- **Policy G4 E 1)** should include at the end '**including an assessment of, and where appropriate a plan, to improve the quality of the space**'.
- **Para 8.4.3** to be amended: [See also above regarding para 8.1.4]. '**In order to achieve the Mayor's target of increase of green cover/space from 48% to at least 50% of London by 2050 (a 4% increase) each borough should set specific and monitorable targets, to achieve that in their borough by 2050. Green Space Opportunity Zones should be considered, eg to apply in 'regeneration' areas, to ensure green space policies are strengthened further in those areas, especially where more homes are being built and therefore more public open space is also needed to serve that area.**'
- Add new para 8.4.5. '**Proposals in Local Plans, Development Plans, opportunity Areas etc to enshrine and enforce public access and rights to use public open spaces, whether existing ones or**

future ones created, will be encouraged and supported. The widespread adoption of 'in perpetuity' covenants eg for each borough's portfolio of sites, through the Fields In Trust scheme, will be supported'

- **Table 8.1.** Under 'Small Open Spaces' add: '...These include **public** gardens...'

Rationale: We support borough assessments of local green and open space to inform policy. To increase the benefits of green space, these should include an assessment of, and where appropriate a plan to improve the quality of the space i.e. an assessment of deficiency in quality rather than just amount of green space and its accessibility. Much green space is poor quality, such as noisy, poorly designed or excessive lighting. The Plan should require boroughs to enhance and manage all green spaces to a high, specified standard referencing the Green Flag criteria.

14. G5 The 'Urban Greening Factor' outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their experience.

Proposed change:

Policy G5 – a further sub-section should be added as follows: **(C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.**

Rationale: Urban greening provisions are supported in general. It should be made clear, however, that this should be in addition to green space provision and the amenity those spaces provide. Those designing new developments should be required to consider the amount and quality of green space needed to fulfil human needs, as well as the amount of green cover required as part of the Urban Greening Factor. Unless this is made explicit in the London Plan, there is a real danger that the Urban Greening Factor will be used by developers to reduce the amount and quality of green space available or being created for public use.

15. G6 The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife.

Proposed change:

Policy G6 – The second sentence in **sub-section A** of this policy should be deleted, along with the whole of **sub-section C**. The following sentence should be added at the start of sub-section D '**All new development should seek to achieve a net gain in biodiversity.**'

Policy G6B2 to be amended: Change 'ie' to '**eg**'.

Rationale: Biodiversity 'offsetting' is a flawed, controversial and highly worrying option. We support submissions made by Friends of the Earth on this matter. In particular, all Sites of Importance for Nature Conservation (SINCs) are precious and deserve to receive the highest level of protection. There should be no provision in policy which would allow development to harm a SINC regardless of their supposed relative significance. It is unlikely to be possible to compensate for the loss of biodiversity through alternative 'off-site' provision as the value of a site is often intimately connected with its location.

16. G7 Mature trees are a vital part of London's green infrastructure and there should be strict controls over felling them in Policy G7, along with recognition of the importance of established hedgerows.

Proposed changes:

The value of hedgerows should be recognised in subsection **B 1) of Policy 7** by amending it to 'protect 'veteran' trees, **mature hedgerows** and ancient woodland,,,'. The first sentence of **Policy G7(C)** should be amended so it reads as follows: "Development proposals should ensure that existing trees of quality, **mature trees and hedgerows, and trees of value in terms of delivering eco-system services such as water or air quality management**, are retained.

Rationale: Inappropriate tree felling and hedgerow removal is a growing problem and policies need to be stronger and clearer to protect London's existing trees and hedgerows, and the benefits they provide. Planting new trees is never an adequate response to the loss of existing mature trees or hedges whose contribution to environmental quality will invariably take decades to replace.

17. SD1 Policy SD1 on Opportunity Areas should require sufficient space for the amenities usually provided by parks, in particular playing fields and courts for open air sport.

Proposed change: **Policy SD1 B(3)** should be amended to read 'plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary, **and ensuring quality and publicly-accessible open and green space is planned for a range of functions, including informal and formal outdoor sports features**'.

Rationale: There is a danger that major new developments are created without sufficient publicly-accessible open and green space to accommodate the amenities usually and necessarily provided by parks. In particular, there is a need for open, flat space required for open air sports, both formal and informal, including ball courts. Explicit provision should be made for such facilities in line with sports provision strategy anticipated demand.

18. D13 The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space, and other relevant policies amended accordingly. **Proposed change:** Additions should be made to Policy D13 Noise as follows:

- Para B: Boroughs [etc] should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations **and ensure local green space is improved in line with Policy G4 (as amended) including by:**
- **taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution, using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or introducing natural or man-made noise barriers.**

Rationale: The impact of noise pollution on human health is second only to air pollution according to the World Health Organisation. The ability to experience peace and quiet is an important aspect of the quality of urban life. Green spaces should provide respite from the noisy urban environment. Recent CPRE research shows that nearly 30% of London's parks are severely impacted by traffic noise (i.e. between 50% and 100% of the park is noisy). Policies should encourage action to tackle this growing problem.

19. S5 A decline in the quality of use of sports facilities is often used as an excuse for allowing development of public open spaces which needs to be addressed in policy S5.

Proposed change: **S5 B(4)** This should be amended to read: "ensure that there is no net loss of facilities. **If there is evidence that ongoing or future demand for sports means facilities are under-used measures should be**

taken to ensure demand is promoted through a local sports strategy or to repurpose the space for an outdoor sport for which there is demand.”

Rationale: There is a cycle of decline in sports facilities, both green fields and hard courts, where underinvestment leads to under-use and this ultimately leads to the loss of those facilities. Policies need to be framed to address this problem and recognise that demand for sports is uniquely tied up with available facilities and often the presence of clubs that promote them locally.

20. DF1 The provision, maintenance and improvement of green space requires substantial funding to help deliver its universally-accepted wide-ranging essential benefits, including the Mayor’s aspirations for ‘good growth’ and increasing London’s green cover, and should be addressed in Policy DF1.

Proposed changes:

Policy DF1 D should be amended to delete at the end ‘firstly’ , ‘priority’ and ‘and following this’. It is suggested that ‘affordable housing and necessary public transport improvements’ be moved down to become one of three 1), 2), 3) sub-paras.

Policy DF1 D (2) should be amended to read as follows: ‘Recognise the importance of affordable workspace and culture and leisure facilities, **including public green and open space**, in delivering good growth.’

Rationale: Planning obligations and a proportion of Community Infrastructure Levy should go towards improving parks and green spaces. Where there is major development, in particular close to parks or green spaces, there ought to be a contribution by developers towards improving the quality, including enhancing the tranquillity, of green space, and to help fund future management, for example via an endowment.

Glossary It is proposed there be a definition for ‘Parks’, and/or ‘Public Open Space’ - as set out in the Table 8.1 but not limited to that.

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