



The London Parks and Gardens Trust (LPGT) response to the London Plan 2nd March 2018

About the London Parks and Gardens Trust

The London Parks and Gardens Trust (LPGT) is affiliated to a national body, the Gardens Trust (GT) and as such we are the statutory consultee for planning applications relating to registered parks and gardens in London, on the GT's behalf. As a result, we respond on a regular basis to planning applications that will adversely affect green spaces across the capital.

LPGT was established in 1994 with amateur and professional members – who provide lectures walks, day trips, a newsletter and journal, research and an inventory of historic green spaces. LPGT aims to increase knowledge and appreciation of parks, squares, community gardens, cemeteries, churchyards – all those places that form London's open space network.

LPGT uses trained volunteer historic landscape researchers to assess the significance of green spaces in London and create an Inventory. This useful data resource has been made available through our online Inventory <http://www.londongardenonline.org.uk> providing public access to a wealth of information on over 2,500 parks, gardens, squares, churchyards, cemeteries and other sites of historic interest across London. Criteria for inclusion on the Inventory has been those sites whose history dates back at least 30 years and are of significance for their design, landscaping or social history. Many of London's parks and gardens, churchyards and squares are very well known but there are legions of hidden secrets only known to their local communities, and tracking these down has been part of the remit of the Inventory – a glance at this resource which has associated maps for each local authority shows the spaces we consider a vital resource for London and Londoners.

LPGT has also run for the last 20 years the Open Garden Squares Weekend. This is a ticketed event in June opening private, secret and little-known gardens in a single weekend for public enjoyment and discovery. Over the last 3 years, the event has attracted 40,000 visitors who have made over 150,000 individual garden visits for each of the three weekends.

The Board is made up of a variety of leading professionals in the field of Landscape Architecture and Gardens. Our Planning Group who lead on responses to planning applications across London include planners and experienced Landscape Architects and is led by Sally Prothero from LDA a leading landscape architect designing many of the modern interventions in Parks across London. Our Chair is Ruth Holmes is Chartered Landscape Architect for nearly 20 years, with a focus on park management, volunteering and community engagement, working in the private, public and charity sectors. LPGT is run on a voluntary basis, reliant on income generation from sponsorship and membership contributions, with the support of approximately 2 FTE employees.

Our response

As is recognised in the draft plan, London's green spaces and public parks – around 3,000 throughout greater London – are a vital resource for the capital. They offer not only health and wellbeing benefits, but also mitigation against air pollution, noise pollution and flooding. Despite this, they are undervalued and under-resourced. We welcome the introduction of

Natural Capital Accounting to demonstrate the true extent of their contribution, but we would like to see the Mayor go further by encouraging planning authorities to take the opportunity to build in additional funding at this stage through CIL and other Infrastructure payments to contribute to not only capital costs but to improving and increasing good quality green infrastructure through funding management and maintenance.

The Trust is keen to see that the National Park City deliver real benefits to London by protecting and enhancing green space. If by becoming the first National Park City a mechanism for generation of funding across all London (similar to the Lea Valley Park) to invest in Green Infrastructure through a statutory contribution in tax that can adequately fund high quality management and maintenance of existing and new parks and GI, then it would achieve a tangible success.

Similarly if a method can be devised for allowing local authorities to convert Community Infrastructure Levy (CIL) money into management and maintenance of parks, this would help counteract the current reductions in Central Government funding resulting and cuts to parks maintenance budgets leading to a decline in quality and quantity of green infrastructure. Such investment would deliver tangible benefits that could be measured.

It also needs to champion environmental education and research working with providers such as the Field Studies Council.

National Park City Status should imply certain associated planning powers in order to promote and protect green spaces, but this is not clearly stated in the policies and should be included if the National Park City is to deliver something tangible. Currently for example, even Grade II parks and gardens, which may be adversely impacted by planning applications, aren't currently even considered by Historic England (H.E) and thus have very little protection. Similarly we see ongoing encroachment and commercialisation of green spaces, with little by way of planning protection – these encroachments, even temporary, can have a substantial impact on the uses of parks and their beneficial effects in terms of wellbeing in a city that needs to become denser to meet the growing population projections. We would suggested advising planning authorities to include all listed landscapes in conservation areas in addition to other planning protection. Other suggestions for adequate protection should be specifically discussed with statutory consultees such as ourselves, and H.E.

A National Park normally has planning officers to deliver additional policies and protection. We would like to see the GLA consider employing these in any National Park City designation, and carry out capacity building to encourage volunteers to help respond.

As a general note, the Trust observes this is a long document without mention to special protection for the Royal Parks (which are a huge tourist draw) and designated historic parks and landscapes over and above greenspace, playing fields etc. There is an important distinction here.

The Trust has restricted it's comments to focus only on matters which affect green space and historic landscapes. Moving onto the specific policies.

Chapter 3

- Policy D1 A7 and A9 The Trust welcomes the principle of making sure Development Plans address the location of green and open spaces are conveniently located for social interaction but would urge more tie in with the fact that parks help prevent or mitigate the impacts of noise and poor air quality *as well as flooding*.

- Policy D1 B Development Designs - 5 we suggest a rewrite as follows:

5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water *and absorption of air pollution and noise pollution*

The Trust endorses statement 3.1.4 but urges the Mayor to note that a green corridor is not a substitute for provision of well designed landscapes of a more significant size that enable children to play.

- Policy D4 Private outside space

The Trust welcomes a minimum standards definition and the need for space to be of sufficient utility (para 3.4.6) but does not think these measures will deliver on the intent. An inner courtyard measuring 1.5m by 1.5m without daylight will not be a conducive open space – the Trust recommends a minimum daylight standard incorporated into this measure.

- Policy D7 Public Realm

The Trust is pleased to note paragraph H but prefers a re-write as follows:

H ~~Incorporate~~ *Maximise* green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat, *provide informal play for children* and increase biodiversity.

Comment 3.7.11 – We welcome the aspiration to place free drinking water fountains within parks but urge that careful attention be paid to location and detailed design, most especially in historic designed landscapes. The Trust therefore suggest that these would best be encouraged either in new parks and designed green landscapes; or as part of a restoration of an existing park where a fountain existed previously so as to respect the historic integrity of the designed landscape.

- Policy D8 Tall Buildings

C Impacts para 1, a, iii) We welcome this paragraph but believe a re-write would be beneficial as follows:

Immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy. *Care should be taken to minimize the impact of overshadowing on public parks and green spaces, particularly on summer afternoons for those spaces with children's play facilities, seeking to achieve a minimum BREEAM standard access to sunlight of 2 hours between 3pm and 6pm.*

Para 3 Environmental Impact, a and c are particularly welcomed by the Trust. However, the use of open space needs to include reference to *adjacent historic parks and green landscape.*

The Trust is pleased at the proposals for 3-D modelling but would wish these models to include assessments on sunlight and shadowing.

Comment 3.13.6 Why does the Mayor delegate the definition of Tranquil Areas to Local Authorities? The Trust believes these should be designated by the London Plan in accordance with the rest of the spatial planning maps provided and would urge that the land identified by DEFRA should be designated for protection now. The Trust notes that the Heathrow Expansion public consultation is currently underway and believes that designation of these spaces by the Mayor would have a significant influence on the chosen flight paths and the impacts on biodiversity.

Chapter 4.

The Trust supports comment 4.2.9.

Chapter 5

- Policy S3 Education and childcare facilities

B Development proposals for education and childcare facilities

9) locate facilities next to parks or green spaces, where possible

The Trust notes the above policy and agrees with Comment 5.3.10 that the design of education and childcare facilities is critical to the creation of a good learning environment but is concerned that locating a school next to a park or other green space may be seen as a substitute for providing on-site play areas, which should maximize opportunities for introducing biodiversity and green landscape.

The Trust therefore recommends a rewording as follows of the previous paragraph:

8) ensure that facilities incorporate suitable accessible outdoor space *onsite, ideally at ground level, which provide as much green space as possible for contact with nature and increasing biodiversity*

- Policy S4 and S5

In recommending this wording above for Policy S3 B 8, the Trust notes that both policy S4 and S5 mention off-site provision. For both off-site and on-site provision we recommend that consideration be given to the quality of the design of these spaces. If play space is not well designed, play-areas can have quite an impact on the character and visual amenity of historic landscapes and other open spaces, adding clutter in the form of brightly coloured equipment, fencing, gates and CCTV etc. This is compounded in smaller open spaces. The Trust particularly welcomes Policy S4, para B 2,d) incorporating trees and/or other forms of greenery into play schemes.

Policy GG1 in Chapter 1 discusses making the best use of land and promotes high-density, mixed-use development favouring brownfield land and surplus public sector land among other sites. This has potential to impact London's historic landscapes in terms of increased footfall and associated demand for facilities and amenities. As land gets segregated to accommodate the additional uses this could result in fragmented parts of historic landscapes which in turn can lead to de-valuing the landscape and designing in social problems. The Trust strongly recommends that the Mayor works with HE to mitigate against this outcome by adding in a statement to support the maintenance of the historic character and significance of a landscape (see link with Comment 7.1.7).

- Policy S7

There is no specific mention of the social and cultural heritage evident in London's cemeteries, yet Comment 5.2.8 earlier on discusses co-location of facilities. In particular the

Trust believes several major historic cemeteries' deserve special protection including the 'Magnificent Seven' (Brompton, Highgate, West Norwood, Tower Hamlets, Abney Park Cemetery, Kensal Green and Nunhead) amongst other historic cemetery landscapes.

The Trust believes that in general when considering the re-use of burial space thought should be given to the significance of the existing memorial. In seeking to increase burial space, boroughs should consider the landscape design intentions of the cemetery as a whole. The pressure for more space should not lead to the erosion of historic landscape design by the infilling of paths or other specifically designed open features. Guidance is provided, in particular in Chapter 8, by *Technical Guidance on the Re-Use and Reclamation of Graves in London Local Authority Areas* (October 2013) by London Environment Directors Network.

Chapter 7

The Trust notes the policies proposed for Heritage and Culture and supports Comment 7.1.7 about setting of historic places playing an important part in the heritage significance. The Trust also strongly welcomes Comment 7.1.8 and recommends that Local Authorities are encouraged to monitor this situation and use their powers of intervention (including compulsory purchase).

The Trust believes Table 7.1 Designated Strategic Views takes insufficient account of the views *from* parks, in particular in relation to the Royal Parks and some other areas of rare open space within the Central London zone. Equally important views from parks include views adjacent to Battersea Park, Bishop's Park in Fulham, Syon Park, Duke's Meadow, Hampton Court and Kew as well as Victoria Tower Gardens. The Trust therefore would encourage the introduction of protection for all views from the Thames river bank (blue space) adding iconic views such as the one of Battersea Power Station from Vauxhall.

Chapter 8

The Trust endorses the views expressed by Parks for London for re-writing some of the policies. The absence of specific reference to London's specific cultural heritage in terms of the Royal Parks and especially the network of London's squares is remarkable – they are a huge tourist draw. The network of historic landscapes (designated by Historic England) also contribute significant to both wellbeing and environmental mitigation. The Trust also sees a vital role for recognizing the River Thames and the land adjacent to it as a historic landscape forming part of the Green Infrastructure (see response to Policy SI 14).

- Policy G4

Many local green and open spaces are not designated heritage assets and are often at risk if not identified in Local Plans. The Trust through it's Inventory has been working hard to research and document the historic importance of these spaces as well as their social value. We endeavour to encourage local authorities to include these spaces in their Local Plans but would welcome further strengthening of this aspiration by the Mayor. The Trust would also strongly recommend the introduction of measures not only in relation to the quantum but the *quality* of open space and *protection of it's setting*, which the current policy as drafted has omitted.

The Trust also notes there is a tendency for new memorials to chose to be sited in public parks and green spaces. This can alter their character and detract from the recreational value and in some instances their contribution to biodiversity and the environment. The Trust urges an additional policy is introduced encouraging new memorials to be placed in areas other than local green and open spaces.

- Policy G5

The Trust welcomes this policy but would add that we also need green infrastructure such as rain gardens, green walls and green roofs that are *appropriate to their historic setting*. This policy should also encourage better management and maintenance of parks and other green spaces so they can reach their full Green Infrastructure potential. With the right management parks can help cool the city but the evapotranspiration systems can't work if sites are parched, have inappropriate planting, are compacted or paved over with hard-standing to cope with the levels of over-use in areas of open space deficiency.

In that light we also urge greater care is taken to make sure that new space is given over to full public access rather than as private development which are often under-used and exacerbate the surrounding impact on existing public green space. Examples include the area along Nine Elms and near St George's Wharf where landscapes are kept locked mainly for viewing and are rarely used, and where planting does not offer as much environmental mitigation as possible.

With this in mind, the Trust queries the values placed in Table 8.2 and disagrees with the weighting for Amenity Grassland being of less value than Green Walls or Standard trees planted in pits with soil volumes less than two thirds the project canopy area of the mature tree, as we believe the social value and potential for use as informal play area has been overlooked in these calculations.

- Policy G7

The Trust is concerned that the tree planting programmes may lead to tree canopy increase in existing open spaces to the detriment of other habitat types. Many of London's small open spaces are compromised already by too much dense tree cover that makes them dark and uninviting. This loss of access to light has been amplified by the increase in tall buildings particularly in the centre of London detracting from the unique sense of calm and relaxation that parks can afford. This often leads to a fear of anti-social behaviour, real or perceived. These spaces are often planted with good intentions but then not managed due to lack of funds, and sometimes understanding.

The Trust fully supports increasing the number of large canopy street trees as part of the Healthy Streets guidance/agenda. However, there has been historically many trees planted in historic landscapes, parks and open spaces which has been inappropriate to their character. Either as spaces become so densely treed, or planted with inappropriate species that can destroy views and sense of place – and these are often the aspects people love about parks and gardens. As the city seeks to urbanize and densify occupation further, the need to preserve areas for tranquillity and improvements to mental health and well-being will become ever more important.

The Trust believes greater clarity should be given about what constitutes strategic locations and urges protection of historic landscapes as a caveat to this policy but welcomes protection of 'veteran' trees.

Chapter 9

Policy SI14

The Trust notes that although there is reference to the strategic importance of the Waterways there is no definition of this role. These are important spaces and deserve designation in their own right as blue spaces that also have an impact on biodiversity and well-being.

Chapter 10

The Trust supports prioritizing walking and cycling but believes there needs to be greater protection of green spaces often impacted by cycling infrastructure and would welcome clarity over how this can be managed.

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