

GLA Environment Committee – wildlife and green spaces consultation

Summary of CPRE London’s response

August 2013

CPRE London has responded to the London Assembly Environment Committee’s survey investigating London’s green spaces and their value for biodiversity. This report is a summary of our response.

In response to the assembly’s question about what *positive changes* there have been in relation to green spaces in London CPRE London notes that there are examples where policy and investment have directly targeted green infrastructure. This has been particularly the case where green spaces are shown to specifically deliver Sustainable Urban Drainage Systems (SuDS), such as DRAIN London and City for London’s Local Plan. Also recent planning changes do contain some positive elements: the National Planning Policy Framework has commitments on green belt (ch.9), such as para 79. which highlights that the “*essential characteristics of green belts are their openness and permanence*” as well as on supporting natural resources (ch.11). The London Plan makes also specific commitments on green infrastructure (policy 2.18), urban greening (policy 5.10) & green roofs (policy 5.11).

Regarding the *negative changes* CPRE London has observed however, they are several:

1. Housing & development pressure: Reports from our members indicate there is increasing pressure for housing on green spaces / green belt sites whilst brownfield sites with planning permission are being 'banked' by developers. According to the London Development Database (LDD) the total loss of 'Open Space Land' over a four year period, between 2009 and 2012 (approved and completed sites) is 215.5 hectares. The most significant loss has been to Metropolitan Open Land (106 ha), followed by green belt (60ha) (see Table 1 & Chart 1).

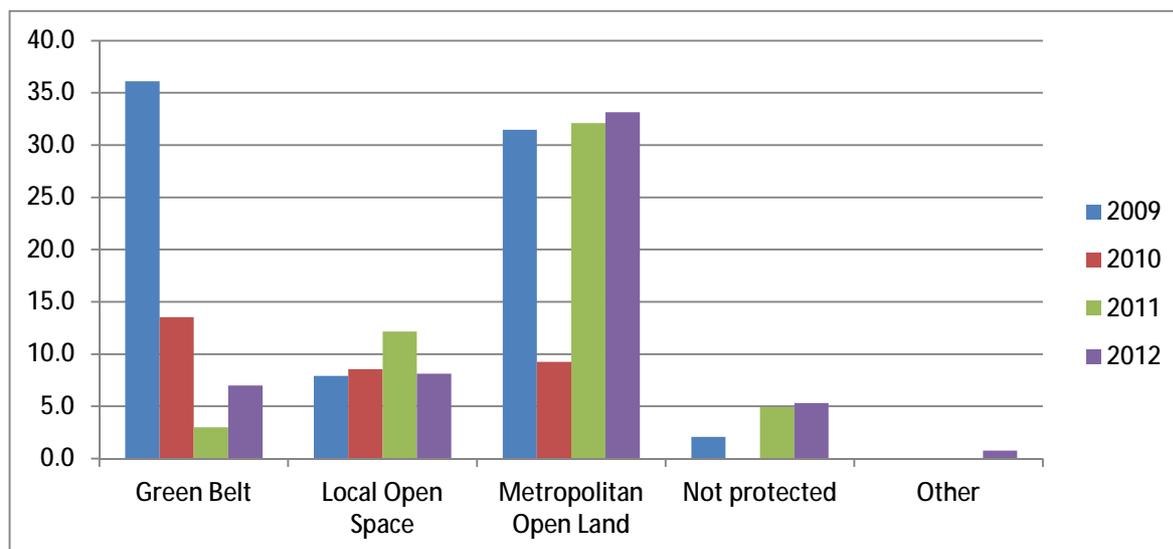
Table 1. Type and area of Open Space land lost (hectares)

Year	Green Belt	Local Open Space	Metropolitan Open Land	Not protected	Other	Total
2009	36.1	7.9	31.5	2.1	0.0	77.5
2010	13.5	8.6	9.3	0.0	0.0	31.4
2011	3.0	12.2	32.1	4.9	0.0	52.2
2012	7.0	8.1	33.2	5.3	0.8	54.4
Total	59.6	36.8	106.0	12.3	0.8	215.5

Source: London Development Database

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Chart 1. Open space loss (hectares) by land type (2009-2012)



Between 2009 and 2012 the largest type of development on London’s open spaces has been from Housing, 32% (Types C2 & C3 according to LDD typology), followed by mixed-use sites, 21% (including C2 and C3 housing) and sports-related developments, 17% (D2). See Table 2 and Chart 2.

Table 2. Development type and area open space lost (ha), 2009 - 2012

Year	Commercial	Community building	Housing (inc car park spaces)	Mixed-used site (inc housing)	Schools	Sports	Car parks	Park land	Allotment	Total
2009	9.1	1.6	31.5	5.4	16.6	10.6	0.0	2.7	0.0	77.5
2010	2.9	3.8	3.6	15.8	1.3	2.7	0.0	1.3	0.0	31.4
2011	0.6	0.0	22.8	4.6	13.9	10.3	0.0	0.0	0.0	52.2
2012	2.5	0.6	10.1	18.7	1.7	12.0	7.6	0.0	1.1	54.4
Total	15.1	6.0	68.0	44.6	33.5	35.6	7.6	4.0	1.1	215.5

Source: London Development Database

We are receiving increasing numbers of reports from members who are concerned about such developments on the Green belt and open spaces. Recent examples include: [Warren Farm, Windmill Lane, Ealing](#); Wormwood Scrubs, Old Oak Common, Hammersmith & Fulham; Cane Hill, Coulsdon, Croydon; Whitchurch Playing Fields, Harrow; [Tamplin Mews, Westminster](#).

2. Lack of strategic investment in green infrastructure / ecosystem services: There is a continued market failure to recognise the multiple benefits derived from green infrastructure - more than simply SuDS climate adaptation / risk mitigation role. This has resulted in under investment in green infrastructure. The London Mayor & boroughs need to maximise these wide benefits i.e. ecosystem services: provisioning, supporting, regulating & cultural ([CPRE London’s Living London guide](#), 2013 pp2).

3. NPPF ambiguities: NPPF commitments to the Green Belt are more ambiguous than those in the Planning Guidelines that preceded NPPF, thus allowing for looser 'interpretation' i.e.

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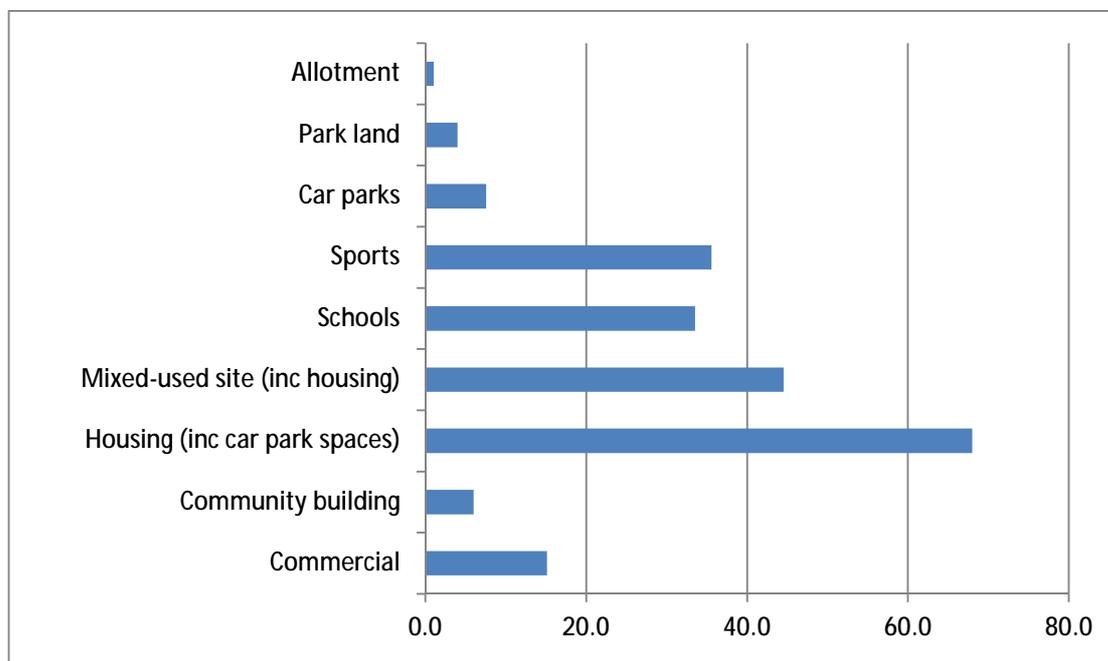
loopholes. An example is that the green belt can be used for housing as long as another green space is substituted for this. The new land may not carry the same ecological, cultural, economic values as the original site however. Such trade-offs need to be more fully assessed before consent is given.

4. Declining political will, capacity and investment in regional landscaping & connecting up green corridors: in particular in delivering the All London Green Grid, and noting a number of outdated Borough Open Space Strategies.

5. Community support and local democracy: Lack of support, training, resources to enable communities to adopt and manage local sites. Communities need to be engaged in decisions that impact local green spaces. For example the decision to sub-contract Barnet Council services (including planning) was made without taking account of public opinion.

6. Private green space loss due to extensions & parking - The size of extensions that no longer require planning permission has been doubled to 6m for attached houses and 8m for detached (DCLG 2013). This is placing considerable pressure on private garden space (which provides important wildlife habitats and green connectivity) and creates conflict among neighbours. There is also continued pressure for parking spaces leading to destruction of front gardens. New homes built at higher densities typically have no front gardens and are lucky to have pocket spaces at the back (e.g. Lidbury Square development, Mill Hill).

Chart 2. Total open space lost (ha) by development type between 2009- 2012



Finally, with regards to the question "What more could London Borough's and the Mayor of London do?" CPRE London proposes:

1. Green space policy and investment – London Boroughs need to update their Local Plans & Open Space Strategies, to boost green space investment and connectivity. Boroughs should

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include clear policies in their local plans and open space strategies, as well as budget / investment strategies that aim to enhance existing sites as well as connect up local green spaces within the Green Grid regional corridors. The London Mayor should increase investment in delivering the All London Green Grid. These policies are vital to tighten up ambiguous interpretation left open in the NPPF / London Plan.

2. Ensure brownfield-first developments and impose compulsory purchase orders &/or charges on developers that sit on sites and empty properties.
3. Ensure assessment of value of existing green spaces prior to any permission to develop in exchange for a new open space site – assessing value to community, environment, local economy as a part of decision making process
4. Community support - Work with schools, faith groups, residents & housing associations to encourage maximisation of green infrastructure benefits, protection and management of green spaces, including private gardens. Provide additional grants and incentives to encourage local ownership of sites.
5. Produce an annual green infrastructure report – in-depth accounting of the multiple assets green spaces provide, reporting on the relevant London Plan KPIs and delivery of the London Boroughs' open space strategies. The last London Plan review (2011-12) talks about 'net' changes in green space' – reflecting the loss of open spaces to development as compared to 'proposed' new green spaces that are created. It does not however give any indication whether these proposed open spaces have actually been created. Nor does it capture the assets these sites provide e.g. recreational, tourism, health-related, food production, air quality, biodiversity, climate mitigation / adaptation, noise reduction etc.



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