

By email to: LGSC@london.gov.uk

London Green Spaces Commission
c/o Greater London Authority
City Hall,
The Queen's Walk
London, SE1 2AA

3 June, 2019

Dear Commissioners,

We write in response to the formal call for evidence to the Commission to assist with its aim to support the management and funding of London's precious parks and green spaces. We do so as London's leading environment charity for protecting green spaces and championing their contribution to making the city a better place for everyone.

Our work in recent years demonstrates clearly that there is a desperate need to enhance the resources devoted to the protection, promotion and enhancement of London's green spaces. Despite the wide-ranging social, environmental and economic benefits they provide, parks and green spaces are under immense and growing pressure which threatens to undermine their contribution to the health and wellbeing of people who live in and visit London, as well as their role in sustaining and improving the natural environment. Green spaces are essential components of the concept of a National Park City which we strongly and actively support and which we are delighted that the Mayor is backing.

We would like to emphasise the following key points which we believe should be central to the work of the Commission:

First, we recognise the major challenge of finding ways to finance the long term management and improvement of parks. While we are conscious of the ongoing pressure on local authority budgets, we are concerned that some of the new funding models that have been developed are failing to deliver the quality of green space that is needed, and in some cases are having a significant detrimental impact on the environmental and social benefits they should be providing for local communities. We are sceptical about the desirability of outsourcing park management to private companies who often depend on poorly skilled and under resourced staff, and who have little knowledge or attachment to a local area. This model also breaks, or at least weakens, the essential democratic link between park management and the local community. The Commission should address these concerns.

Solutions also need to be found to avoid commercial events taking over our parks to the extent that prevents free public enjoyment of them for the best part of a year. This fundamentally contradicts the original purposes of public parks which is to provide free access to green space, opportunities for quiet recreation and relaxation, contact with nature and fresh air for all sections of the community. There is a need to reinstate these essential functions of public green space, by improved legal and policy measures, if their benefits are to continue to be eroded by creeping privatisation. Public funding for parks is decreasing and already far too low compared to the public benefits they provide. The Commission would do a great service if it can make the case for reversing the decline in public funding of parks and ensuring that new and enhanced resources go to enhancing their social and environmental benefits.

Second, CPRE London is committed to promoting greater community engagement with local green spaces. We have been working with the London Friends of Green Spaces Network to support existing and encourage the creation of new friends groups where they don't currently exist. Friends groups can be a valuable way of promoting community engagement with and use of green space and a way of reaching those parts of the community who are less able to access the benefits of green space. While we recognise the valuable role that such groups can also play in improving the management and suitable use of green spaces, we do not believe they should be seen as a replacement or substitute for effective management through sustainably-funded, democratically-accountable bodies.

We are concerned that so-called 'innovative' funding models, such as independent trusts, are not a suitable long term response to the current financial challenges faced by local authorities. Without greater capacity and guaranteed income, we are particularly concerned that spending time seeking external funding would be a waste of already very stretched resources. Community engagement with parks through friends groups, and other approaches which seek to reach otherwise 'excluded' groups, should be seen as an essential component of effective park management, rather than a replacement or alternative management model.

Third, CPRE London believes that not enough is being done to ensure that London's green spaces are effectively protected from inappropriate development. While we welcome recognition in the draft London Plan of the value of parks and green spaces as part of London's essential green infrastructure, we are concerned that the policies in Plan are not strong enough to resist the relentless development pressure facing many green spaces. There is also a need for more effective implementation of policies to safeguard our most precious green spaces, including Metropolitan Open Land and Green Belt from incremental erosion. For example, lack of clarity over the definition of 'brownfield' or 'previously-developed' land has led to proposals for inappropriate development on areas of hardstanding, such as tennis courts, in green spaces. Our submissions to the recently completed examination in public of the draft London Plan propose policy changes which would help address these concerns. As London's population grows, our green spaces will become even more

valuable for local communities and they need stronger protection to ensure they are not built over and lost for ever.

Finally, we believe that London's green spaces need to be promoted more vigorously as vital to the future of the capital as a global city. This requires a new and ambitious vision for enhancing and connecting the green space network so that it can deliver greater social and environmental benefits.

While we welcome in broad terms the natural capital approach to assessing the benefits of green spaces, we are not convinced this concept has the sophistication to identify and promote the improvements necessary to improve the quality of green spaces in terms of people's experience and the benefits for wildlife. In particular, much more can be done to realise the significant benefits provided by parks and green space for mental and physical health and wellbeing, as well as the health of the environment. For example, we have been promoting the concept of 'tranquil London' to demonstrate what might be done to improve the quality of experience in green spaces and the wider public realm, including by reducing the impact of traffic noise in parks. We are pleased that the Royal Parks Agency are currently considering, in developing its 'Movement Strategy', how best to manage traffic in its parks with that end in mind. Such an approach should be promoted in all London parks.

The current review of the All London Green Grid presents a major opportunity to develop and present a refreshed and dynamic vision which provides a platform for the future contribution of green space in London, including the Green Belt and countryside which surrounds the capital. This should match the scale of ambition embodied in the 1943 County of London Plan, co-authored by Sir Patrick Abercrombie - founder of CPRE - who proposed the idea of a coordinated 'regional park system' of open spaces in which *'the space around and between buildings needs planning in relation to the larger open spaces in the areas, so that there is an interpenetration of greenery from the parks into the residential areas, and it becomes possible for the town dweller to get from doorstep to open country through an easy flow of open space from garden to park, park to parkway, from parkway to green wedge and from green wedge to Green Belt.'*

CPRE London urges the Commission to put in place a robust and compelling case for long term public funding to ensure a sustainable and vibrant future for London's parks and green spaces for the benefit of people and the natural environment.

We would be delighted to elaborate on any of these points and contribute further to the Commission's work as necessary.

Yours sincerely,

Neil Sinden,
Director