The London Parks and Gardens Trust (LPGT) response to GLA's 2017 Draft Environment Strategy

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 London Gardens Online http://www.londongardensonline.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. Our Chair is Head of Landscape and Horticulture at RBG Kew at Wakehurst Place. LPGT is run on a voluntary basis, reliant on income generation from sponsorship and membership contributions, with the support of 2.1 FTE employees.

Chapter 5: Green Infrastructure - GI

Response to 2017 Draft Environment Strategy, Chapter 5: GI Section

Introduction
The Trust welcomes the opportunity to comments on the draft environment strategy and has concentrated its response on the Green Infrastructure Section as this is our area of expertise and responsibility.
As a County Gardens Trust under the umbrella organisation of the GT we are a statutory
consultee frequently responding to planning applications that adversely affect London’s
greenspaces, championing their cause by providing expert research and commentary on the
protection and conservation of London’s Parks and Gardens. We seek to conserve historic
designed landscape and have developed a resource documenting the expert garden history
research and making this information publicly available through our Inventory at:
http://www.londongardensonline.org.uk. In addition to this we run the Open Gardens Square
Weekend which is a celebration each year of the amazing greenspaces of London and the
thousands of volunteers who make these high-quality and well-maintained places possible.

The Trust is glad to see a long-term vision for the strategy to 2050 but would like to see a
clear action plan that can communicate the proposals and the time-scales help delivery of the
policies. We are keen to see action taken now to prevent the decline of the quality of
London’s Parks and Gardens which play a vital role in the strategy.

We would like to note that the second bullet point in Proposal 5.3.1a needs clarification as it
is worded in such a way that it is not at all clear what it is trying to convey.

Please find our responses to the questions posed below.

**Question 1:**
The Mayor’s ambition is to make London a National Park City. What should the
attributes of the National Park City be and what would we need to achieve this to be
successful?

**Financial:**
The Trust is keen to see that the National Park City does more than be a concept promoted
through social media and graphic design, but delivers real benefits to London.

If it could, for instance, lobby for and put in place 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 revenue budgets for parks, to address the current
reductions in central govt funding and resulting cuts to maintenance budgets, then decline
can be addressed and tangible benefits can be measured.

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

**Planning Powers:** National Park City Status would surely imply certain associated planning
powers in order to promote and protect green spaces, but this is not apparent in the strategy
and should be included. 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 constant encroachment
and commercialisation of green spaces, with little by way of planning protection at present.
What additional planning protection would the GLA suggest? This 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.
The GLA should consider employing these in any National Park City designation, and carry
out capacity building to encourage volunteers to help respond.
Question 2:
In what ways can the Mayor help to ensure a more strategic and coordinated approach to the management of London’s networks of parks and greenspaces?

Strategic alignment of Voluntary Organisations
The Trust has looked at 27 of the voluntary organisations in the sector that have overlapping and unique interest in delivering the GI agenda in London. We are looking at how best to work collaboratively and coordinate our efforts to make sure that we can be effective in championing, celebrating and conserving parks and gardens. However, funding and resources are key issues for the sector and another commission may not be the answer unless it is sufficiently funded and can help capacity building and leverage funding through CIL or Section 106 agreements. (see answer to Q1)

It should also be possible for CIL contributions to converted to revenue budgets to be used for GI/park maintenance & management purposes to address the real problem of lacking revenue budgets. (see answer to Q1)

Planning Powers
(Also see answer to Q1)
As LPGT is a Statutory Consultee for planning matters affecting parks and green spaces (GI) we have noticed that the decline in Conservation Officers in local authorities planning departments means that many parks are now more threatened from both development, commercialisation and private events which effectively shut large parts of parks, for long periods. Others have seen large numbers of new paid for ‘attractions’ which exclude many residents. We do not have capacity to deal with all the planning applications we are asked to comment on, and would welcome help in capacity building to increase our reach and coverage to safeguard and champion GI further.

Training and Education
Our concern about the growing skills shortage in the sector, means that investment and access to training and education is required, even to respond to planning applications. Our expertise in research into the value and significance of our open spaces means we are well placed to help communicate this as shown through London Gardens Online http://www.londongardensonline.org.uk/ and the Open Gardens Squares Weekend, which has in excess of 5,000 Twitter followers as well as other social media followers via Instagram and Facebook.

Question 3:
Do you think the proposed policies and programmes will ensure London’s important wildlife is protected and enhanced?

There is currently a lot of emphasis on tree planting in the Draft Strategy. As a Trust we are not convinced that these policies/programmes will be very useful or effective as we have concerns with loss of other habitat in parks and gardens if they are over planted with trees. Large tree planting programmes are better targeted at streets. We would like to see biodiversity net gain required by development with more publically accessible open spaces and parks, rather than relying solely on privately accessible living roofs. All new buildings should have green roofs and/or walls, for all the benefits that are given, and we would support and welcome this. It is not clear how offsetting will work in practical terms and what guarantee that this will deliver protection in the long term.
There is not enough about soil conservation, protection of existing landscapes, parks and gardens or promotion and funding for other habitat types, and this is vital to maintain biodiversity.

We would prefer to see tangible solutions rather than quick fixes that have not been properly considered. The strategic pooling of funding through Section 106 or CIL funding, particularly for smaller developments may deliver real green infrastructure benefits. There should be a % applied to these sources of planning levy, ring fenced perhaps, to deliver green infrastructure projects.

There needs to be policy and programmes that helps deal with the skills shortage that is facing the green infrastructure (parks and gardens) sector. There is no mention of apprenticeships or stemming the cuts to services that already employ parks staff/landscape architect/managers, and who are vital to the succession and sustainability to deliver the aims by 2050. The Royal Parks Guild does a great deal of work with horticultural apprentices across London by running Master Classes. And the Landscape Institute provides guidance for obtaining expert advice within the sector. These organisations should also be involved.

**Question 4:**  
Do you think the proposed policies and programmes will be effective in increasing London's tree canopy cover?

The Trust’s real concern is 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 it 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.

We fully support 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 tranquility and improvements to mental health and well-being will become ever more important.

**Question 5:**  
How best can natural capital thinking be used to secure greater investment in the capital’s green infrastructure?

Natural Capital Accounting should be policy requirement so that every local authority carries out the exercise of accounting for green infrastructure benefits and this could be supported through GLA policy and **funding.** The Brent examples shows that GI can deliver 10 times the benefit it costs. This should be mandatory for all boroughs to show the benefits of GI on their balance sheets and report this to their politicians and residents. This would help make the case for investing in good quality green infrastructure – particularly parks and gardens, and support the case for Central Government statutory funding of green spaces and GI. Similarly an accounting method to monetarise and demonstrate the social benefits of parks should be developed (similar to the i-tree method for trees) and this could be funded and rolled out by the GLA.
Question 6:
Please provide further comments on the policies and programmes mentioned in this chapter.

The Trust would like to highlight that The London Parks and Gardens Trust is not mentioned in the text or the appendices, yet it is a statutory planning consultee, on behalf of The Gardens Trust and as such performs an important function in protecting them in planning matters adversely affecting them, and promotion of London’s varied green spaces through Open Garden Squares Weekend.

There is an omission of the recognition of the expertise held by landscape professionals such as landscape architects and landscape managers. It is also not acknowledged that there is a skills shortage and little succession planning particularly in the horticulture sector. There should be polices covering apprentices and training across the sector as it is not clear how expert advice will be delivered in practice. A toolkit showing L.A.s how to do Natural Capital Accounting, linked to a GLA funded staffing and funding mechanism could be one such strategy that this Environment Strategy could usefully deliver.

We consider the need for quality parks and open spaces that are well funded, maintained, and function successfully as green infrastructure as well as social and cultural infrastructure is not sufficiently emphasised and we would urge the GLA to prioritize the creation of new quality designed landscapes in the major regeneration areas with management structures for their ongoing maintenance. We would recommend a policy on design and protected parks is inserted into the existing GLA Policy 5.1.1 and would welcome the opportunity to discuss this in more detail.

The recent Government Select Committee Enquiry responses should be examined, and the many calls made during that process for a statutory spending requirement for parks should be addressed in the GLAs Strategy, or other funding mechanisms devised. This is essential to reverse the 70% +/-reduction in Central Government funding since 2010 that most local authorities have faced, and that have so adversely affected London’s green spaces.

Overall, the real challenge to delivering this strategy is addressing the lack of funding and resources. There may well be different funding models to explore but due to deep financial cuts there are less people with less time to ‘think creatively’ or deliver the vital work. It is also difficult to imagine how much can be successfully delivered by volunteers if there is little resource to coordinate and train them appropriately.

General Question.

Do you agree with the overall vision and principles of this draft London Environment Strategy?

There is one mention of designed landscapes (in the introduction to chapter 5). In the glossary for landscape it refers to natural landscapes. The statement "Given the competing pressures for land in London, it is not feasible to create extensive areas of new public open space or natural habitats based on the old model of parks" is one that we would challenge as evidenced by the number of responses to the Government’s Select Committee showing how much people value their parks.

There is a paragraph on "European and National Nature Conservation Designations" but not one on historic parks and gardens. We consider this a serious omission regarding the quality of designed public parks and the Mayor has a leadership role in protecting
this world quality asset that makes London special and unique and gives a sense of place to many local neighbourhoods.

**Planning and Conservation Working Group, for LPGT. 15th Nov 2017**

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