

# London Green Spaces Friends Groups Network

The London network for the 600+ Friends and User Groups for all green open spaces [www.lfgn.org.uk](http://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 and green spaces*

To the Mayor of London 16.11.2017

Response to the Draft London Environmental Strategy

## **IMPROVED POLICIES AND EFFECTIVE ACTION URGENTLY NEEDED TO PROMOTE, SUPPORT, ENHANCE, PROTECT AND EXTEND LONDON'S PUBLIC GREEN SPACES**

**SUMMARY:** London's 3,000 public green spaces need statutory recognition and effective protection by all tiers of Government. This needs to be backed by adequate public funding (eg from infrastructure budgets and taxation), good management to green flag standard, and active community involvement. This is not only to address the current deepening and disastrous underfunding crisis but also to fulfil the full potential and benefits of our green spaces for nature and for London's communities. 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.

In the light of the deteriorating situation, some substantial context may be helpful before direct reference to the draft Strategy policies.

### **1. The Friends Groups movement**

The LGSFGN 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.

Local Friends Groups are independent community organisations set up by park users and local residents to promote, protect and improve a local green space - in essence to 'take ownership' of the space on behalf of local communities and park users. Friends Groups are responsible for a wide range of highly positive achievements, including: organising local events of all kinds, planting bulbs and helping increase biodiversity, disseminating information and news, producing publicity and history pamphlets, working closely with parks staff and managers, getting key user groups to work together, developing visions for improving local spaces, accessing and lobbying for resources and funding, and so on.

The LGSFGN 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 (around 17 so far) working in partnership with Local Authorities and parks management. We meet bi-monthly at City Hall to share news and views. We work in partnership with, or alongside, a range of key organisations including Parks for London, the London National Park City Campaign, Campaign to Protect Rural England (London) and others who care strongly about London's public green space.

We are gradually encouraging the development of active Friends Forums in all 32 London boroughs. Nationally, there are over 6,000 local Friends Groups and the many local networks are linked together through the National Federation of Parks & Green Spaces – of which we are the London regional section. It now feels that our grass-roots (literally!) movement is fast-growing and fast-evolving into something very significant. We are aiming for a Friends Group for every urban green space, a Friends Groups Forum for every borough and area, and a statutory duty on all Councils and landowners to protect and manage all their spaces to Green Flag Award standards.

## **2. What do our public green spaces require, and what do Londoners have the right to expect?**

Every green space should have the management and maintenance it deserves to enable the local community to enjoy its many benefits. This includes adequate on-site staffing, buildings and facilities in good condition and in daily use for activities which enhance the open space usage, well-maintained natural and horticultural areas, playgrounds, paths and park furniture. And the local community and in particular any Friends or User groups need to be encouraged and enabled to be fully involved in the management of that green space.

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. Where else can community cohesion occur so abundantly - with London's many minority ethnic groups, people of all ages, classes and interests intermingling, enjoying the exhilaration and freedom of open, public and green space?

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## **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 an 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 at any time.

Government public spending cuts have seen savage reductions to London boroughs' parks maintenance budgets over the last 6 years - with more cuts threatened. We don't want London's green spaces to return to the scandalous neglect and dereliction that afflicted most of the country's urban green spaces 20-30 years ago. Most Friends Groups were set up in the last 15 years precisely for that reason. Their often stupendous efforts have gradually borne fruit, but for most the recovery is not yet complete – and Government cuts have thrown the gears into reverse. There are also growing problems caused by privatisation and fragmentation of local services. Most spaces don't even have a Friends Group yet so are likely to be in a particularly poor state, or well on the way there.

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 last but not least 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. Our member groups and borough Forums are reporting increasing major threats and accompanying public uproar regarding open green spaces throughout London – parks, sports fields, nature reserves, woodlands and cemeteries etc. They are witnessing cuts in parks' staff, increasing inappropriate commercial usage and even loss of sites or parts of sites to development.

In the autumn/winter of 2016 the DCLG Local Government Select Committee MPs held a major National Inquiry into the future of Parks. Many national greenspace organisations submitted similar views to those we've expressed above. Over 300,000 signed a petition calling for the management of parks to be made a statutory service. The Select Committee was sympathetic to this but felt that there could be 'more effective' ways of achieving the same outcomes, including inter-departmental strategic support at every level for parks services.

In response the Government has set up the 'Parks Action Group' of key national greenspace sector organisations (which

the current LGSFGN chair sits on as the Chair of the National Federation of Parks and Green Spaces) chaired by the Minister for Parks. In parallel, to work with the Parks Action Group, the Government has set up a cross-departmental group of representatives of 8 key Government departments. The Mayor of London could and should implement a similar task force looking into the level and sources of funding required to address effectively the deepening crisis.

## 4. The Role and Powers of the Mayor

The Mayor has statutory strategies on biodiversity and on climate change adaptation, as well as the London Plan. He has control of a number of substantial infrastructure budgets, including TfL, and the ability to raise further taxes and precepts. These and other powers need to be mobilised to support and protect our public green spaces, especially in this exciting and significant era of the global spotlight being on London becoming a National Park City.

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The Mayor's election manifesto\* included these pledges:

1. **Protect nature and play space**
2. **Protect the green belt, green spaces and play spaces**, prioritising development on brownfield sites
3. **Strengthen protections for open spaces within the London Plan**, including playing fields, Metropolitan Open Land, and our Sites of Importance for Local Nature Conservation and nature reserves
4. **Protect wildlife and biodiversity** by creating green corridors through the city
5. **Make London the first 'National Park City'**
6. **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.

In a recent Mayoral response to the reduction in local authority funding for green spaces, the Mayor stated: *"I will continue to highlight the adverse impact of this and lobby government to ensure local authorities are adequately resourced to deliver a full range of necessary and important local services. I'll also be developing an environmental improvement programme and tree-planting campaign to provide local communities with support to conserve and enhance local green spaces"*

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.**

\* Extract from the London Assembly Green Spaces Investigation Outline, 11.11.2016

## 5. Improvements to the draft London Environmental Strategy

The LES contains some good policies and aspirations reflecting many of the above points. The commitment to London becoming a National Park City is strongly welcomed. However, the key issue is do the policies, most of which are not new and many are very vague, actually address the real facts on the ground?

We say, in the light of what's happening throughout London, the policies must be strengthened, sharpened, expanded and then nailed down with more detail to ensure they are implemented effectively.

These are some of the ways we submit that the Strategy can be improved:

- a. The Mayor should implement a Parks Task Force of key greenspace organisations and cross-departmental representatives to look into the level and sources of funding required to address effectively the deepening crisis, and to support Local Authorities and the boroughs' parks services.
- b. 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 well-run and easily-accessible public green spaces.
- c. Biodiversity 'offsetting', it should be made clear, is a controversial and highly worrying option. We support the submission made by Friends of the Earth on this matter.

- d. The Mayor should urge all Local Authorities and owners of public green spaces to enter into 'in perpetuity' covenants by agreement with Fields In Trust. FiT already have negotiated over 2,500 such covenants across the UK and there is a substantial shift in favour of negotiating such covenants 'en masse' for a borough (as is currently the case in Hammersmith and Fulham) rather than just piecemeal.
- e. The Mayor should 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.
- f. The Mayor should commit, as promised during his election campaign, to strengthening the protections for all categories of public green space.
- g. Regarding Policy 5.3.1, the Green Spaces Commission should not be targeted to 'new business models' but should be applied to supporting the management of green spaces generally. The policy should not be restricted to 'new approaches to investment' but to all sources of investment that could be effective in addressing the underfunding gaps. The Mayor should note the need to avoid the dangers of fragmentation, loss of scale, long-term risk and increasing competition between previously-complementary spaces, that the underfunding and undermining of Local Authority control poses.
- h. The Mayor should lobby to strengthen the provisions of the Greater London Parks and Open Spaces Act (1967) to ensure that the number, size and duration of commercial events (and their setting up and taking down) in parks are explicitly limited so as to safeguard the integrity of public open spaces.
- i. The Mayor should call for the management of public green space to become a statutory service, properly funded through taxation, with spaces judged against the Green Flag award standard.
- j. London Plan open space access/deficiency table criteria need to be enforced in all Borough Plans. Consider creating Green Space Opportunity Zones 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. Green space provision is essential infrastructure and therefore an imperative, not something to be 'balanced' against other policies eg additional housing.
- k. A substantial percentage of s106 and Community Infrastructure Levy agreements, policies and funding pots should explicitly be earmarked for green space revenue (not just capital) for the use of borough-wide parks services.
- l. A substantial percentage of existing London infrastructural budgets should be allocated to Parks Services earmarked for enhancement of public green spaces and their related statutory services/outcomes, eg TfL funding for path maintenance to enable attractive and safe pedestrian and cycle travel routes, creation of SUDS and rain gardens from flood-alleviation budgets etc.
- m. Add a paragraph on the need to counter and roll back the increasing threat to public access and rights to use open space through privatisation of such spaces, whether existing ones or future ones created in developments.
- n. The Mayor should call for Local Authority cross-departmental action to support and strengthen local Parks Services, and a commitment to promote and work in partnership with Friends Groups and borough-wide Friends of Parks Forums.
- o. Green space policies should be included throughout all the relevant sections of the Mayor's strategies and all relevant sections of the London Plan. Eg regarding the Transport Strategy we have argued that Healthy Streets should be supplanted or enhanced by Healthy Green Routes. The same applies to the relevant sections of Health and Well-being strategies, the Housing Strategy and so on.
- p. The Mayor should commit to channelling and raising significant funding (tens of millions of pounds) to local Parks Services through the various means identified above, and through specific levies (eg hotel taxes) and a London-wide precept.

## APPENDIX

### GLA evidence to DCLG Select Committee Inquiry, Officer submission [September 2016. Extracts]

The Greater London Authority has a particular interest in the future of public parks in London because the Mayor is obliged to set strategic policy for London's natural environment and green spaces through his London Plan and his environment strategies. By providing citywide leadership the Mayor also has a role in assisting boroughs to develop new approaches to securing the resources needed to manage and maintain public parks, and to determine the role of parks in a city which continues to grow and develop. The Mayor is also committed to making London a 'National Park City' – a policy framework and public campaign to maintain and enhance London's status as a city of parks and green spaces. The quality and extent of public parks is also highly relevant to the Mayor's Health Inequalities Strategy and his Economic Development Strategy. Access to green space is one of the key determinants of health; and London's status as one of the greenest big cities contributes to attracting inward investment and a highly-skilled workforce.

The scale of the problem and the challenge faced by local authorities is set out clearly in the [State of UK Public Parks 2016](#) a recent report from the Heritage Lottery Fund. We do not intend to repeat these arguments here. Suffice to say that the Mayor recognises that public parks need core levels of public funds in order to maintain the basic services and benefits these assets provide. ... The advice and recommendations provided in this submission ... are drawn from [Natural Capital: investing in a green infrastructure for a future London](#), the report of the independent Green Infrastructure Task Force. The points below are a summary of the key messages [note: extracts]:

- Parks and green spaces should be regarded as components of an integrated 'green infrastructure' that is recognised as being as vital to the economic development of our cities as the existing infrastructure of roads, rails, pipes and cables.
- Cities need to rethink the way we plan, design, manage and fund existing green spaces. The role of green spaces, especially in the urban environment, need to be reframed (for example, by combining recreation with flood risk management or protection of heritage with green walking and cycling routes) and regularly upgraded or modified, as happens with other forms of infrastructure.
- Considering green infrastructure as a network also means that we should fill the gaps in our green infrastructure by incorporating it into buildings and public realm.
- Government needs to ensure better join-up of policy and programmes across departments in order to ensure the benefits of green infrastructure are realised and supported by all relevant Departments, including DCLG, Defra, Department of Health and Department for BEIS.

**Recommendation: Those responsible for making key decisions about a city's infrastructure should acknowledge that the green parts [of] cities will need to provide a wider range of benefits. They should also recognise that this green infrastructure needs to be planned, managed and funded like other essential infrastructure.**

...the management and maintenance of London's traditional green infrastructure has been subject to boom and bust cycles of public funding, i.e. periodic capital investment followed by often inadequate long-term maintenance funding. This has been exacerbated by the fact that green infrastructure provision is not a statutory requirement for local authorities and therefore there are no dedicated or ring-fenced funds allocated to green infrastructure provision. This is an area that could be addressed as part of the debate on fiscal and financial devolution. For example the London Finance Commission suggested, in its report [Raising the Capital](#), allowing London government to introduce levies on environmentally detrimental or unhealthy activity to assist in delivering wider public good objectives.

Changing the way we value the benefits of green infrastructure will help address these problems. Some of the approaches advocated by the Natural Capital Committee and others may be helpful and need to be embedded into practice. But it is also clear that new sources of funding and finance are needed. These include models that compensate for environmental loss or degradation, or leverage more private sector finance to offset the costs of upgrading more traditional infrastructure....

**Recommendation: As of the ongoing identify the scope for additional levies or compensatory mechanisms on environmentally detrimental activity that could assist in funding green infrastructure projects. These should include, for example, 'stormwater credits' and 'biodiversity offsetting'.**