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## Parks for London

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### Parks for London response to the draft London Plan

Parks for London is an independent charity that loves London's parks and green spaces. We work with the people that manage, maintain and enjoy them, keeping them thriving, accessible, safe and beautiful places. We seek to ensure that London's green infrastructure continues to thrive now and into the future. Our charity enables the people who plan, design and manage London's parks and green spaces to share knowledge and experience. Our role is also to maintain and improve quality, maximise services and benefits and get the most from limited resources.

Our vision is a London that is a healthy and sustainable world city; a place where parks and green spaces make a major contribution to the health and wellbeing of Londoners and to the environment they live and work in.

#### Boxed statements are quoted directly from the draft London Plan

For brevity, this response focuses on Chapter 8 Green Infrastructure and Natural Environment and refers to areas that Parks for London has a direct interest under its charitable objects.

#### Policy G1 Green Infrastructure

**B Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, *learning and development*, health and wellbeing, sport and recreation.**

Parks for London believes that green infrastructure strategies should also take account of the need for learning and development (shown above in *italics*). Parks and green spaces contribute to Londoners learning, particularly but not exclusively to school children. A growing number of schools are building on their green space to cope with increasing pupil numbers and academy schools, which have no requirement to provide green space mean that schools need to use local green spaces for outdoor learning. Para 8.1.1 should similarly include the words 'learning and development' as well.

**Policy G1 Para C Development Plans and Opportunity Areas Planning Frameworks should:**

- 1) Identify key green infrastructure assets, their functions and their potential functions**

We agree that the Mayor's draft Environment Strategy that green infrastructure can perform multiple functions. Therefore, this policy statement should use the plural form of the word function.

Para 8.1.2 Parks for London supports the Mayor's proposal to review and update existing Supplementary Planning Guidance on the All London Green Grid.

**Policies G2 London's Green Belt & G3 Metropolitan Open Land (MOL)**

Parks for London strongly supports the protection of Green Belt and MOL from inappropriate development and looks forward to the final version of the Environment Strategy to encourage Boroughs to **enhance the quality and range of uses** of Green Belt and MOL.

**Policy G3 Metropolitan Open Land**

D 2) It includes open air facilities, especially for leisure, **learning**, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London

We believe that learning should be added to the Policy G3, para D2 for the reasons mentioned for Policy G1.

**Policy G4 Local green and open space**

Parks for London believes that this policy is the weakest part of the chapter. It should include protection for all green space of 20 ha and under, listed under the categories of District Parks, Local Parks and Open Spaces, Small Open Spaces, Pocket Parks and Linear Open Spaces listed in Table 8.1 – Public open space categorisation along with Commons and London Squares.

We suggest that Policy G4 should be amended as follows:

**Policy G4 ~~Local~~ Other green and open spaces under 20 ha**

A ~~Local~~ **All** green and open spaces should be protected.

C Boroughs should undertake a needs assessment of ~~local~~ **all** green and open spaces **of under 20 ha** to inform policy.....

Para 8.4.3 We strongly support the move to secure appropriate management and maintenance of open spaces in places of deficiency, especially Privately Owned Public Space and suggest that you cross reference this to Policy D7 G Public Realm and the Public London Charter.

Table 8.1 – Public open space categorisation

In the light of the draft Environment Strategy's cognisance of the importance of quality green space and our better understanding of the value of green space through Natural Capital Accounting, Parks for London strongly believes that this table needs a thorough revision. Its focus is on the size and proximity from homes is a good start. We propose that a column is added that lists the multiple benefits or functions of these open spaces. See attached

### **Policy G5 Urban greening**

Parks for London strongly supports the adoption of the 'Urban Greening Factor' as it will encourage more hospitable solutions when place making more densely populated areas, provide more green cover and ameliorate the impact of climate change.

### **Policy G6 Biodiversity and access to nature**

We suggest that Para B1) should be altered as follows:

Policy G6 Biodiversity and access to nature B 1) use the relevant procedures to identify SINCs and <del>green</del> <b>ecological</b> corridors...
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### **Policy G8 Food growing**

We believe that provision of growing space/community gardening should be encouraged in existing green spaces not just new developments. Therefore, we suggest the following wording:

Policy G8 Food growing A 1) protect existing allotments and encourage provision of space for community gardening, including for food growing, within <b>existing and</b> new developments
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Please contact me if you need to clarify any of our comments.

Yours sincerely

  
**Tony Leach, Chief Executive**

Draft partly completed alternative for  
Table 8.1 - Public open space categorisation

Category	Description	Size	Distance from home	Multifunctional benefits that contribute towards improved outcomes							
				Biodiversity & ecological resilience	Climate protection & adaption, eg water & carbon storage, urban heat cooling	Air & water quality, eg, reduced particulates	Health, eg, physical & mental wellbeing, tranquillity	Recreation: passive & active, eg, play, sport & physical activity, encouraging walking & cycling; connectivity	Social cohesion, eg, volunteering, community gardening, citizen science	Cultural offering, eg, events, festivals, activities	Food growing
Regional Parks											
Metropolitan Parks											
District Parks											
Local Parks & Open Spaces											
Small Open Spaces											
Pocket Parks											
Linear Open Spaces											