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# Planning for London's Parks and Green Infrastructure

## A Toolkit for Local Groups

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# 1 Introduction

## The purpose of the toolkit

- 1.1 An increasing population, rising land values and demands for local government to think differently about service delivery, and be more efficient, are likely to have significant consequences for the provision and management of London's parks, green space and other green infrastructure.
- 1.2 However, due to recent [planning reforms and the Localism agenda](#), there are also more opportunities for local groups to influence the protection and enhancement of local green spaces and green infrastructure.
- 1.3 This toolkit seeks to build awareness of the benefits of a greener London and signposts individuals and local groups to the London Plan planning policies and the framework these provide to protect and enhance green space.

## 2 Why Protect and Enhance London's Green Spaces and Wider Green Infrastructure?

### Context

- 2.1 London is one of the greenest cities in the world. Seen from above, more than half of the area is green or blue. Glass skyscrapers, busy streets and heritage buildings coexist with allotments, rivers, parks, cemeteries and gardens. London is surprisingly rich in wildlife and natural landscapes too, with Thames side marshes, medieval parkland, ancient woodlands and chalk downland.
- 2.2 London's existing arrangement of parks and green spaces is a legacy of when their primary purpose was the provision of outdoor recreation and the protection of heritage – both of which are still valid and important today.
- 2.3 The most famous of London's network of parks are the eight Royal Parks. Covering 1976 hectares (ha), they are former royal hunting grounds which are now open to the public.
- 2.4 Many of the smaller green spaces in central London are garden squares, which were built for the private use of the residents of the fashionable districts, churchyards or incidental green spaces in and around post-war housing estates.
- 2.5 A large number of parks were created by local authorities between the mid-19th century and the Second World War, in response to the suburbanisation of London and the need to create spaces for recreation and to protect the heritage of country houses, farmsteads and natural habitats which were being subsumed into the growing city.
- 2.6 Communities have played a vital role in the creation and protection of parks and green spaces over the last 150 years. In the last 15 years the rise of dedicated 'Friends of' groups focusing on parks and open spaces throughout the capital has helped increase awareness of the value our green spaces. The groups help to secure protection and appropriate management of green spaces in collaboration with the boroughs.

### The value of parks and green space

#### Heritage

- 2.7 Many of London's parks and green spaces are designated (fully or partly) as [Registered Parks and Gardens](#) by Heritage England or Conservation Areas by Boroughs that define and protect them for people to enjoy. They also often provide important locations from which to view and appreciate the cityscape and cultural heritage of London. There are many additional open spaces that are of considerable heritage importance. The [London Parks and Garden Trust](#) have undertaken an inventory of over 2,500 important parks and green spaces that contribute to the historic character and distinctiveness of London.

#### Recreation and tranquillity

- 2.8 Parks and green spaces provide opportunities for a range of recreational activities and tranquil areas for quiet contemplation in an increasingly busy city. This in turn affords benefits to physical and mental health and well being.

#### Biodiversity

- 2.9 Parks and green spaces form the key element of London's biodiversity resource and many sites are designated for their biodiversity value. Links between parks and green spaces are also

important for the movement and dispersal of wildlife. For more information on green space in Greater London go to [GiGL](#).

### **Social and economic benefits**

- 2.10 The economic and environmental benefits are complementary: the more mature and diverse the habitat the greater the biodiversity, attracting a wider array of flora and fauna and in turn people – tourists and Londoners. Conserving and managing access to biodiversity also creates sustainable jobs.
- 2.11 Open green spaces are often the central focus of London’s neighbourhoods as venues for social and cultural interaction.

### **Air quality**

- 2.12 Vegetation helps disperse and absorb air pollutants. For example, street trees can reduce street-level concentrations of nitrogen dioxide and particulates in the local atmosphere. Parks and green spaces also provide opportunities for green routes for walking and cycling, thereby helping people avoid air pollution hotspots.

### **Climate change adaptation**

- 2.13 In the face of predicted increases in localised flooding, green space plays an important role in reducing the volume and speed of rainwater run-off, resulting in less flooding and consequently damage to property and disruption to transport.
- 2.14 In contrast to buildings and other hard surfaces which absorb ambient heat, parks and green spaces tend to reflect and disperse heat. The overall effect can be a reduction in the so called ‘urban heat island effect’ which is predicted as a result of climate change.

## **Development pressures on green space**

- 2.15 The majority of parks and green spaces are safeguarded to a degree from development as a result of planning policies designed to protect and enhance open space and statutory designations, such as Sites of Special Scientific Interest and Registered Parks and Gardens which protect heritage and nature conservation assets. However, pressures for development in and around parks and green spaces are likely to intensify as new sites for housing, employment and infrastructure are sought.
- 2.16 Furthermore, development adjacent to parks, particularly high rise buildings, can affect people’s enjoyment as a result of visual intrusion and overshadowing, and also diminish heritage and ecological value by, for example, altering views, drainage patterns and micro-climates.
- 2.17 At the same time, the growth and intensification of population in local areas triggers greater needs for more open space to address growing deficiency as defined by the London Plan.

## **Capital values and revenue costs of green space**

- 2.18 Local authorities are not legally bound to provide or manage parks and green spaces. Without effective investment, however, the community and ecosystem services that parks and green infrastructure provide are at risk. Left unmanaged, parks and gardens can become unsafe, hotspots of anti-social behaviour, lose their significance as heritage assets, and vulnerable to development which results in the loss of green space. Furthermore, as the population rises and with it land values, Boroughs may have to consider selling some of their surplus capital assets, such as parks and green spaces, in order to release equity that can be used to maintain statutory services and to reduce maintenance costs.

### 3 London Plan Policies for Protecting and Enhancing 'Green Infrastructure'

- 3.1 The [London Plan](#) is unique in England and Wales in that it is the only remaining statutory regional spatial strategy. As a consequence London Boroughs are required to prepare development plans (usually referred to as [Local Plans](#)), and make planning decisions, that conform to the London Plan. Therefore an understanding of London Plan policies can help local groups to make the case for green space protection and enhancement through planning policy for a range of issues – from sustainable design to local character, biological and geological diversity to archaeological and heritage interest.
- 3.2 Furthermore, the concept of green infrastructure has become more widely accepted and understood in recent years, and this provides a more powerful range of arguments for the protection and/or enhancement of the existing green space network and for increasing the amount of greenery within the built environment.
- 3.3 The [London Plan](#) defines green infrastructure as a:

*"network of all green and open spaces together with the Blue Ribbon Network that provides multiple benefits to Londoners. It functions best when designed and managed as an interdependent 'green grid' where the network should be actively managed and promoted to support the myriad functions it performs."*

- 3.4 This section outlines the key London plan policies relating to the protection management and enhancement of London's network of parks and green spaces – its green infrastructure.

#### **Policy 2.18 – Green Infrastructure: the network of open green spaces**

- 3.5 The objective of this policy is to encourage a more integrated approach to the management of the parks and green space network such that it delivers a wider range of functions, which are identified in the [All London Green Grid Supplementary Planning Guidance](#)

#### *How the policy influences Local Plan-making*

- 3.6 Boroughs should:
- undertake qualitative and quantitative assessments of green and open space need, having regard to the cross-borough nature and use of many of these open spaces;
  - produce open space/green space strategies, based on [best practice guidance](#);
  - ensure planning policies consider the local planning and management of green infrastructure needs to realise the current and potential value of open space and support delivery of the widest range of linked environmental and social benefits; and
  - In London's urban fringe support, through appropriate initiatives, such as the [Green Arc](#) vision.

#### *How the policy influences development decisions*

- 3.7 Development proposals should:
- incorporate appropriate enhanced elements of green infrastructure that are integrated into the wider network;
  - encourage the linkage of green infrastructure including the Blue Ribbon Network, to the wider public realm to improve accessibility for all and develop new links, utilising green chains, street trees, and other components of urban greening; and
  - contribute to addressing regional or metropolitan park deficiency areas, where proposals fall within them.

- 3.8 The value of green infrastructure not designated as local open space is considered to be a material consideration that needs to be taken into account in the planning process.

### **Policy 5.3 – Sustainable Design and Construction**

- 3.9 The objective of this policy is to ensure that new built development makes a contribution to a more sustainable urban environment and minimises wider environmental impacts environmental impacts. In relation to green spaces and green infrastructure it should be considered alongside policy 5.10 Urban Greening

*How the policy influences Local Plan-making*

- 3.10 Boroughs should have detailed policies and proposals based on the sustainable design and construction principles in the [Sustainable Design and Construction Supplementary Planning Guidance](#).

*How the policy influences development decisions*

- 3.11 Development proposal design and access statements should demonstrate the sustainable design standards for construction and operation in the Mayor's SPG were considered early and are integral to the proposals' construction and operation:
- a. minimising noise, air (including CO<sub>2</sub> emissions) and urban run-off pollution
  - b. avoiding overheating that contributes to the urban heat island effect and adverse local climatic conditions for users;
  - c. efficient use of natural resources (including water);
  - d. minimising waste generation and maximising reuse or recycling;
  - e. minimising risk of natural hazards, such as flooding;
  - f. securing sustainable procurement of materials, using local supplies where feasible; and
  - g. promoting and protecting biodiversity and green infrastructure.

### **Policy 5.10 – Urban Greening**

- 3.12 The objective of this policy is to promote an increase in vegetated surfaces (including green roofs, green walls, street trees, etc.) in the built environment as a key delivery mechanism of the Mayor's [Climate Change Adaptation Strategy](#).

*How the policy influences Local Plan making*

- 3.13 Boroughs should identify areas where urban greening and green infrastructure can make a particular contribution to mitigating the effects of climate change and enhance Londoner's quality of life.

*How the policy influences development decisions*

- 3.14 Development proposals should consider green infrastructure from the outset of the design process and contribute to urban greening through tree planting, green roofs and walls, and soft landscaping, particularly within Central Activities Zone and other densely developed parts of the city.

### **Policy 5.11 – Green Roofs and Development Site Environs**

- 3.15 The objective of this policy is to encourage installation of green roofs (and green walls) because of the benefits they can provide in relation to surface water flood management, biodiversity conservation, food growing etc.

*How the policy influences Local Plan making*

- 3.16 Boroughs are encouraged to develop detailed policies and proposals to encourage green roofs and the greening of developments of all sizes and types, including renovations and extensions where feasible. The Greater London Authority has produced guidance on [Living Roofs and Walls](#).

*How the policy influences development decisions*

- 3.17 Major development proposals should include designs for green roofs, walls and site planting that , where feasible, deliver:
- a. climate change adaptation through aiding cooling
  - b. sustainable urban drainage;
  - c. climate change mitigation through aiding energy efficiency;
  - d. enhancement of biodiversity;
  - e. accessible roof space;
  - f. improvements to appearance and resilience of the building; and
  - g. food production.

**Policy 5.13 – Sustainable Drainage**

- 3.18 The objective of this policy is to reduce the incidence of surface water flooding by dispersing and intercepting as much stormwater run-off as possible before it enters the piped drainage network. The risk to London from surface water flooding has been described by [Drain London](#)

*How the policy influences Local Plan making*

- 3.19 Boroughs should use [Surface Water Management Plans](#) to identify areas of flood risk and develop policies that reduce risk.

*How the policy influences development decisions*

- 3.20 Where practical developments should utilise [sustainable urban drainage systems](#) (SUDS) to achieve greenfield run-off rates and manage surface water run-off as close to its source as possible in line with the drainage hierarchy:
- a. store rainwater for later use;
  - b. use infiltration techniques, such as porous surfaces in non-clay areas;
  - c. attenuate rainwater in ponds or open water features;
  - d. attenuate rainwater in storing in tanks or sealed water features; and
  - e. discharge rainwater direct to watercourses if possible, or if not utilise surface water sewers before combined sewers.
- 3.21 In addition, drainage should be designed and implemented to deliver other policy objectives, including water use efficiency and quality, biodiversity, amenity and recreation.

**Policy 7.4 – Local Character**

- 3.22 The objective of this policy is to ensure that the built and natural heritage of London is properly considered when designing and developing the built environment. The Natural England guidance [London's Natural Signatures](#) is a useful reference in relation to the underlying natural landscapes.

*How this policy influences Local Plan making*

- 3.23 Boroughs should identify the characters of their areas to locate the landscapes, buildings and places that should be sustained, protected and enhanced.

#### *How this policy influences development decisions*

- 3.24 Development should improve an area's visual or physical connection with natural features and if possible contribute to establishing an enhanced character for the future function of the area. Buildings, streets and open space designs should:
- have regard to the form, function, structure and heritage of a place, including the scale, mass, orientation, pattern and grain of surrounding buildings, streets and spaces;
  - have a positive impact on the relationship between urban and natural features;
  - be human in scale to maintain and create a positive relationship between buildings and street level activity; and
  - maintain the positive contributions to character of existing buildings and structures.
- 3.25 The Mayor's [Shaping Neighbourhoods: Character and Context](#) Supplementary Planning Guidance provides additional information.

#### **Policy 7.6 – Heritage Assets and Archaeology**

- 3.26 The objective of this policy is to ensure that London's existing historic built heritage, designed landscapes and archaeological features are protected, and maintained and managed within the context of new development. Heritage assets include [listed buildings](#), [registered historic parks and gardens](#) and other [natural and historic landscapes](#), [conservation areas](#), [World Heritage Sites](#), [registered battlefields](#), [scheduled monuments](#), archaeological remains and memorials

#### *How this policy influences Local Plan making*

- 3.27 Boroughs, in consultation with relevant statutory organisations, such as [English Heritage](#) and [Natural England](#), should maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy.
- 3.28 Appropriate policies that identify, protect, enhance and improve access to the historic environment and heritage assets, their character and settings should be prepared.

#### *How this policy influences development decisions*

- 3.29 Development should identify, record, value, protect, conserve, restore, re-use and incorporate heritage assets, where appropriate, being sympathetic to their form, scale, materials and architectural detail.
- 3.30 New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public.

#### **Policy 7.16 – Green Belt**

- 3.31 This policy seeks to protect London's Green Belt from inappropriate development. It also recognises that Green Belt has an important role to play as part of London's multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility.

#### *How this policy influences Local Plan making*

- 3.32 The Mayor strongly supports the current extent of London's Green Belt, its extension in appropriate circumstances and its protection from inappropriate development, in accordance with national guidance in the [National Planning Policy Framework](#) paragraphs 79-92.

#### *How this policy influences development decisions*

- 3.33 Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in the [National Planning Policy Framework](#) paragraphs 79-92.

### **Policy 7.17 – Metropolitan Open Land (MOL)**

- 3.34 The objective of this policy is to provide protection, equivalent to the provisions provided by Green Belt policy, to large blocks or corridors of open space in London which form distinctive landscapes.

#### *How this policy influences Local Plan making*

- 3.35 To designate land as MOL the land must do at least one of the following:
- contribute to the physical structure of London as a clearly distinguishable space within the built up environment;
  - include open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve a significant proportion of London;
  - contains historic, recreational, biodiversity features or landscapes of national or metropolitan value; and
  - forms a link in the City's network of green infrastructure and meets one of the above criteria.

#### *How this policy influences development decisions*

- 3.36 London's Metropolitan Open Land has the same level of protection as its Green Belt: inappropriate development will be refused, except in very special circumstances. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness.

### **Policy 7.18 – Protecting Local Open Space and Addressing Local Deficiency**

- 3.37 The objective of this policy is to ensure that all Londoners have access to open space, consistent with standards set out on page 24 of the Mayor's Best Practice Guidance on [Open Space Strategies](#).

#### *How this policy influences Local Plan making*

- 3.38 Boroughs should use the London Plan's open space categories, size guide and distance benchmarks to highlight areas of open space deficiency and to facilitate cross-borough planning and management of open space, ideally in accordance with other strategies, such as green infrastructure strategies, to deliver multiple benefits. Future open space needs should be planned for in areas of change – opportunity areas, regeneration areas and intensification areas.

#### *How this policy influences development decisions*

- 3.39 The loss of local protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate.

### **Policy 7.19 – Biodiversity and Access to Nature**

- 3.40 The objective of this policy is to ensure that London's network of [Sites of Importance for Nature Conservation](#) are protected, wildlife populations are conserved, new habitats are created and people have access to nature.

#### *How this policy influences Local Planmaking*

- 3.41 Boroughs should use the procedures and policies in Mayor's [Biodiversity Strategy](#) to identify, protect and secure the appropriate management of:
- [Statutory sites](#) and Sites of Importance for Nature Conservation;
  - Areas deficient in accessible wildlife sites, which are described in [Improving Londoners Access to Nature](#); and
  - Corridors of movement – green and blue corridors – that are of strategic importance in enabling species to colonise, re-colonise and move between sites.

- 3.42 Boroughs should publish policies and proposals for the protection of protected/priority species and habitats and the enhancement of their populations consistent with the regional BAP targets. The Mayor and the [London Biodiversity Partnership](#) have identified targets for the re-creation and restoration of priority habitats. These can be found on page 237 of the [London Plan](#).

*How this policy influences development decisions*

- 3.43 Development proposals should plan for nature from the outset, incorporating opportunities for positive gains into their layout, design and materials.
- 3.44 Developments directly, indirectly or cumulatively adversely affecting the populations of [protected species](#) or [priority species](#) or Sites of Importance for Nature Conservation should be resisted on the basis of the following hierarchy:
- avoid adverse impact to the biodiversity interest;
  - minimize impact and seek mitigation; and
  - seek appropriate compensation only in exceptional cases where the benefits of the proposal clearly outweigh the biodiversity impacts.

### **Policy 7.20 – Geological Conservation**

- 3.45 The objective of this policy is to ensure that the London’s geological assets are protected and appropriately managed. The [London’s Foundations](#) Supplementary Planning Guidance provides a framework and useful guidance.

*How this policy influences development decisions*

- 3.46 Development proposals should be resisted where they have significant adverse impact on designated geological sites. Wherever possible, proposals should make a positive contribution to the protection and enhancement of regionally and locally important geological sites.

### **Policy 7.21 – Trees and Woodlands**

- 3.47 The objective of this policy is to ensure: the protection and management of woodlands; the appropriate management of street trees and amenity trees, and an increase in high quality tree planting in the public realm to ensure a long-term increase in London’s tree canopy. The GLA has produced a [Tree and Woodland Strategies](#) Supplementary Planning Guidance to help Borough deliver this objective.

*How this policy influences Local Plan making*

- 3.48 Trees and woodlands should be protected, maintained, and enhanced, following the guidance provided by the [London Tree and Woodland Framework](#). Boroughs should develop policies to implement a tree strategy that protects ‘veteran’ trees and ancient woodland outside of designated sites.

*How this policy influences development decisions*

- 3.49 Existing trees of value should be retained. Lost trees should be replaced following the principle of ‘[right trees for a changing climate](#)’, taking account of the context within which a tree is to be planted and planting species appropriate to expected future climates. Appropriate planting of additional trees, large-canopied species, should be included in new developments. Guidance on how this can be achieved is provided in [The Canopy](#) and [Trees in the Townscape](#).

### **Policy 7.22 – Land for Food**

- 3.50 The objective of this policy is to promote food growing throughout the city both in local community food growing spaces and on a more commercial basis in the Green Belt.

*How this policy influences Local Plan making*

- 3.51 Boroughs should protect existing space and identify other spaces for commercial food production and community allotments and orchards, for example in highly urbanised areas, the use of green roofs may be an option.

**Policy 7.28 – Restoration of the Blue Ribbon Network**

- 3.52 The objective of this policy is to ensure London’s rivers and streams are restored and improved, including deculverting water courses, where feasible, re-naturalising river corridors and improving river water quality.

*How this policy influences Local Plan making*

- 3.53 Boroughs should identify any parts of the Blue Ribbon Network where particular biodiversity improvements will be sought, having reference to the [London River Restoration Action Plan](#), which sets out the location of opportunities to restore and enhance London’s Blue Ribbon Network.

*How this policy influences development decisions*

- 3.54 Development proposals should restore and enhance the Blue Ribbon Network by:
- a. opening culverts, naturalising river channels and resisting the impounding of rivers;
  - b. increasing habitat value;
  - c. preventing development and structures into the water space unless it serves a water related purpose;
  - d. protecting the value of the foreshore of the Thames and tidal rivers; and
  - e. protecting the open character of the Blue Ribbon Network.

## 4 Ensuring Your Local Area Has the Right Policies in Place

### Creating Local Plans and Strategies

- 4.1 Using the [National Planning Policy Framework](#) and the [London Plan](#) as a base, London Boroughs are responsible for preparing Local Plans. All local planning decisions must be made in accordance with the planning policies in the [Local Plan](#). [Open Space Strategies](#) are supplementary but still material considerations in the determination of planning applications. Such strategies must be prepared with participation of a wide range of stakeholders and agencies, including the public.
- 4.2 All Local Plans go through the same key stages of preparation:
- Stage 1 - Evidence gathering and public participation
  - Stage 2 - Pre-submission publication of preferred outcomes of consultation and sustainability appraisal
  - Stage 3 - Final submission and independent examination in public.
  - Stage 4 - Inspector report and adoption
- 4.3 The sooner you participate, the greater your influence. Start by reading your Borough's:
- '**Local Development Scheme**', or contacting the Council directly to find out what plans they intend to prepare when, and when they are likely to be consulted on.
  - '**Statement of Community Involvement**', which outlines how the Borough will facilitate public participation.
- 4.4 If you think the Borough is not providing a robust framework through which to manage and protect parks or expand, connect and enhance green infrastructure say so, object stating why and offering reasonable alternatives. It is equally important to support plans if you agree with them: tell the Borough either way but say why. Also, keep your comments simple and clear – connect them to the policies and proposals to which they relate by referencing the codes used in the relevant planning documents.
- 4.5 If you want to suggest alternative site allocations or policies it is particularly important to submit your comments early, preferably before stage 2, so that they can be incorporated into the [sustainability appraisal](#) (SA) process. Formal representations to the plan can be made at stages 2 and 3. Influencing and Negotiating at Stage 2 is preferable to contesting policies at Stage 3..
- 4.6 You can add weight to your ideas and aspirations for local parks and green infrastructure by tying them to relevant policies in the [National Planning Policy Framework](#) (NPPF) and [London Plan](#), as well as local evidence bases, strategies and action plans published or supported by the Borough. For example, [open space strategies](#) are important documents for the effective management of open spaces. The London Plan encourages Boroughs to review them regularly and maintain action plans to ensure implementation. Such action plans are a useful tool for gauging a Borough's appetite for maintaining and enhancing its open spaces and an excellent mechanism for proactively developing local planning policy, masterplanning and identifying opportunities for future development applications. CABE's [best practice guidance](#) provides a useful reference when reviewing open space strategies. In addition to this guidance, readers may find English Heritage's guidance on [Understanding Place](#) useful in understanding the context and character of places in local planning.
- 4.7 Contacting other groups and individuals for support and ideas can add weight to comments. Contacting planning policy officers and councillors directly with your thoughts, or even just to express interest in public meetings will help to keep you in the loop.

- 4.8 From April 2014 local planning authorities will not be able to use [Section 106 agreements](#) to fund infrastructure that is needed as a result of the new development. Instead they can charge a '[Community Infrastructure Levy](#)' (CIL) on new development with an internal floor space of over 100m<sup>2</sup>.
- 4.9 Authorities have considerable discretion and flexibility in how they spend CIL funds. They must be spent on infrastructure needed to support their area, but authorities have control over what it is spent on, where and when. CIL money could be collected for and spent on London's open and green spaces to deal with local deficiencies.
- 4.10 Public consultations must be carried out on the preliminary draft charging schedule and final draft charging schedule before examination. Local people may make representations about a draft charging schedule and can request to be heard before the examiner at the [Community Infrastructure Levy examination](#).

## Creating Neighbourhood Plans and Orders

- 4.11 [Neighbourhood planning](#) is a new tier of optional plan-making introduced by the [Localism Act 2011](#) and laid out in the [Neighbourhood Planning \(General\) Regulations 2012](#). Neighbourhood Forums can prepare positive and proactive mechanisms for streamlining the planning process, delivering and encouraging sustainable development not blocking it.
- [Neighbourhood plans](#), which contain general planning policies and site allocations for local planning matters against which planning applications are assessed.
  - [Neighbourhood development orders](#), which define an area and type of development as eligible for permitted development rights, either for full or outline permission without the need for planning applications.
  - [Community right to build orders](#) for site specific planning applications made by community organisation proposing small developments, such as housing, community buildings or services.
- 4.12 As statutory planning documents, they carry legal weight and are material considerations in the determination of neighbourhood planning applications and appeals.
- 4.13 London-based community groups wishing to draw-up neighbourhood plans and orders must apply to the Borough Council to be 'Neighbourhood Forums'. To qualify as neighbourhood forums community groups must have at least 21 members who live, work or are elected in the area and be established for the principle purpose of improving the neighbourhood's environmental, social and economic well-being. To apply, a plan identifying the boundary of the neighbourhood should be accompanied by a statement outlining why it should be designated and why the community group is capable of being the 'qualifying body'.
- 4.14 It is the responsibility of the Neighbourhood Forum to consult local people and statutory consultees on the neighbourhood proposals for six weeks before submission to the Borough Council for formal consideration. Following submission to the local planning authority the Borough will consult for a further six weeks before appointing an independent examiner to check the plan/order is in line with European, National and local planning policy.
- 4.15 A community referendum involving those living in the neighbourhood covered by the neighbourhood plans or orders and eligible to vote in Council elections must be organised and funded by the Borough. Business-led neighbourhood plans or orders require two referenda: one for local residents and one for local businesses. A simple majority must be achieved for the plans or orders to be adopted, highlighting the importance of engaging with the wider community on the value of green infrastructure local, for inhabitants, businesses and wildlife.
- 4.16 Like [Local Plans](#), [neighbourhood plans](#) and orders must have regard for the [National Planning Policy Framework](#) and the [London Plan](#) and the Borough's local planning documents, including the Local Plan. As all higher tier planning policies should promote the maintenance and enhancement of parks and green infrastructure they can be relied upon to demonstrate the required planning precedent for appropriate expansion and further enhancement in the neighbourhood. A useful example is [Bankside Neighbourhood Forum](#)'s emerging Neighbourhood Plan is designed to [deliver](#)

[positive greening](#) in the area. Further to this, other organisations, such as [English Heritage](#) can provide specific expertise on neighbourhood planning and development orders.

## Designating Local Green Space

- 4.17 Paragraph 76 of the [National Planning Policy Framework](#) outlines how local communities through local and neighbourhood plans can identify green areas for special protection and designate land as '[Local Green Space](#)', safeguarding land from new development other than in exceptional circumstances consistent with green belt policy.
- 4.18 In order to designate land as 'Local Green Space' communities must demonstrate that the land in question is demonstrably special to a local community holding particular local character and significance for beauty, history, recreational value, tranquillity or richness of wildlife. The space cannot be an extensive tract of land and can only be designated when a plan is prepared or reviewed.

## Case Study: Vauxhall Supplementary Planning Document, London Borough of Lambeth

### Objectives

- 4.19 The London Borough of Lambeth prepared a [Vauxhall Area Supplementary Planning Document](#) (SPD) to translate the [London Plan](#), the Council's [Core Strategy](#) and the [VNEB Opportunity Area Planning Framework \(OAPF\)](#) strategic ambitions to a level of detail useful at a neighbourhood scale. Prepared at a time of considerable market driven development pressure, it paints a picture of Vauxhall in 10-15 years' time to show communities, developers and landowners how schemes can and should contribute to the areas on-going and sustainable regeneration.

### Approach

- 4.20 In preparing a draft of the SPD, the Council recognised the wide range of community groups that form Lambeth's civil society, providing vital services and a voice for citizens to express their point of view. The local community, key landowners and developers were all extensively consulted on Vauxhall's priorities, challenges and issues.
- 4.21 LUC were commissioned to carry out a study into Vauxhall's Parks. Action Plans and costed schedules of improvement works were produced for Vauxhall Pleasure Gardens, Pedlars Park, Lambeth High Street Recreation Ground, Vauxhall Park and Larkhall Park to inform the parks and open spaces content of the SPD.
- 4.22 Current and future open space provision was considered alongside alternative approaches to the future management of the parks.
- 4.23 [Friends of Vauxhall Park](#), [The Friends of Vauxhall Pleasure Gardens](#), [Friends of Larkhall Park](#), [Friends of Lambeth High Street Recreation Ground](#) were all consulted.

### Outcomes

- 4.24 The Vauxhall area SPD and supporting documents were approved by Lambeth Council's Cabinet on January 14<sup>th</sup> 2013.
- 4.25 The SPD requires developers to design their schemes such as to provide appropriate and new public open space as part of individual site development, or part of a wider locality, where the provision of joined up public open space is required to service the open space/ public realm requirements of a number of developments sites. The provision and maintenance of open space and public realm, will as necessary be secured by S106 Agreements.

## Beyond Planning

- 4.26 The planning system is not the only route available to local groups wanting to protect the community spaces they value, local communities can make the legal case for designating open green spaces as '[assets of community value](#)' under the [Localism Act 2011](#) or a '[Town or Village Green](#)' under the [Commons Act 2006](#). Further information can be found via the [Open Spaces Society](#).
- 4.27 Green space users and local communities are increasingly forming 'Friends of' groups to help protect and improve their local green space, and raise public awareness of its importance to their local community. For examples see the [London Green Spaces Friends Groups Network](#).

## Case Study: Southbank Undercroft named 'Asset of Community Value', London Borough of Lambeth

- 4.28 In March 2013, the Southbank Centre announced proposals to refurbish its Festival Wing and create a new events space in an undercroft traditionally used by skateboarders, graffiti artists and bikers.
- 4.29 A campaign group called Long Live Southbank, represented by law firm SJ Berwin (now known as King & Wood Mallesons LLP), applied to Lambeth Council to preserve the undercroft's current use as an '[asset of community value](#)' under the [Localism Act 2011](#).
- 4.30 Lambeth Council confirmed the undercroft's listing as an '[asset of community value](#)' in July 2013. This listing may affect planning decisions. It is however open to Lambeth Borough Council to decide whether the listing is a material consideration in applications for change of use. This listing apparently did not prevent SouthBank from trying to gain planning permission to redevelop the site and remove the skateboarders. The site was only secured for the skateboarders after LLSB sought to register the land as a green, was refused and challenged that decision in the High Court by way of judicial review. The Open Spaces Society intervened in the case in support of LLSB. The result was that the case was settled out of court with a guarantee that the skateboarders can continue to use the undercroft.
- 4.31 A simple listing of a site as an 'asset of community value' offers no guarantees and it would be misleading to suggest that it does. Indeed, this example shows that such a listing carries little weight.

## 5 Influencing Local Planning Applications Affecting Green Space and Green Infrastructure

- 5.1 [Development management](#) is the term used to describe the management of the planning application process from the early consultation conducted prior to the submission of applications through to the discharge of planning conditions tied to consented planning proposals. The planning process is designed to give local communities the opportunity to engage developers, planning officers and councillors on the nature, value and appropriateness of development proposals, to improve developments and reduce their negative impact. This process can be used not only to oppose development but also to maximise the greening of new development and to protect parks and green infrastructure adjacent to development schemes.

### When to engage

- 5.2 Local communities have only two opportunities, (if there is no planning meeting); three, if there is a planning meeting; and four, if a planning decision is appealed against, to meaningfully influence the design, scale and location of a proposed development.

#### During an applicant's [pre-application consultation](#)

- 5.3 Good practice requires developers to consult communities and consider their responses before finalising and submitting planning proposals to the local planning authority. Pre-application consultation by an applicant gives Londoners an opportunity to have their say on the design, scale and community benefit of a development before it is formed into a completed planning proposal for determination by the local planning authority.

#### During a [local planning authority's consultation on the full planning application](#)

- 5.4 Following the formal submission and validation of a planning application the local planning authority is required to notify local people and relevant statutory consultees of its existence generally for a period of 21 days, within which anyone is invited to comment on the contents of the application for consideration as part of the determination process.

#### During a [planning committee meeting or appeal](#)

- 5.5 It is important to establish when and how the planning application will be determined – by planning officers under delegated powers, or by Councillors at planning committee. If a planning committee is convening to discuss the application local groups can request the opportunity to speak at the meeting.
- 5.6 The majority of [appeals](#) are made to the planning inspectorate because the local authority has refused planning permission. Following the collection of written representation, public hearings are called to discuss the merits of the appeal. Members of public and local groups can write representations and speak at hearings.

### How to engage

- 5.7 Consultation responses are very important to the decision-making process. Londoners have a unique insight into the potential effects (positive or negative) of development proposals on London, its inhabitants and the wider environment. When engaging in the consultation, it is important to understand that the planning system is not just a mechanism for objection – but also

for registering support and a platform for negotiation. Local residents facing unpopular urbanising development should always take a pragmatic approach. Outright objection is often the least constructive way of influencing a development's design, scale and location. Regardless of if you object to or support a proposal, suggesting amendments, alternatives or [planning conditions](#) supported by planning policy is the most effective way of to alleviate concerns or get the most sustainable development, i.e. the one with the greatest (greenest) local benefit.

- 5.8 A starting point is to understand the application in the context of relevant green space and green infrastructure designations and ecological, heritage and environmental data. A considerable amount of this information is held by Greenspace Information for Greater London (GIGL). GiGL provides access to local groups to these datasets via a [data search service](#).
- 5.9 All relevant planning documents, planning applications and correspondence, including statutory consultee responses, are available to the public via the London Boroughs' planning webpages. Particular planning applications can be found by searching the address of the proposed development or the application number (a series numbers and letters) assigned once the application has been validated for consideration for planning permission, i.e. once it has been confirmed that all the required documentation and evidence has been submitted for the Borough and consultees to make an informed decision on the application.
- 5.10 In addition to the public, statutory bodies are consulted for their expertise and advice before planning decisions are made. Responses by statutory consultees are publically available via Local Authority websites. Reviewing and quoting relevant statutory consultee responses can help to strengthen your planning arguments. Relevant statutory bodies regularly consulted include:
- English Heritage / GLAAS Greater London Archaeology Advisory Service
  - Environment Agency
  - Greater London Authority
  - Natural England
  - Thames Water
  - Transport for London
  - Department for Culture, Media and Sport
  - Department of Energy and Climate Change
  - Department for Environment, Food and Rural Affairs
  - Department for Transport
- 5.11 All comments should be submitted in writing and based on a sound understanding of the proposal. The comments should only relate to 'material considerations', i.e. planning issues supported by policy or evidence and relevant to development proposals in London. Material considerations may include:
- National Planning Policy, such as the [National Planning Policy Framework](#).
  - Relevant policies in the London Plan, [Local](#) and [Neighbourhood Plans](#).
  - [Pre-application consultations](#).
  - Loss of trees or hedgerows.
  - Loss of playing fields
  - Impacts on nature conservation of biodiversity potential.
  - Heritage assets including [Conservation areas](#), [listed buildings](#) and [Registered Parks and Gardens](#).
  - Layout, scale, density and design.
  - Pollution – air, water, noise or visual.
  - Flood risk.

- 5.12 One example of positive planning through proactive public participation is the award-winning neighbourhood regeneration scheme on [Church Street, Westminster](#). The scheme was made a success through extensive consultation and discussion with the local community throughout the planning process.

## Case Study: Elephant and Castle Urban Forest Campaign, London Borough of Southwark

### Objectives

- 5.13 The Campaign seeks to raise awareness of the value of the urban forest in and around the Heygate Estate in Elephant and Castle; to protect it, encourage people to enjoy it responsibly and maintain access during and after redevelopment.
- 5.14 The heart of the forest – the Heygate Estate – is to be redeveloped, increasing the density of the built environment and putting the trees at risk. The Campaign aims to minimise this risk as much as possible by putting the forest at the heart of the proposed project design.

### Approach

- 5.15 In the summer of 2011 the Campaign raised the profile of forest and the threat it is under through the creation and promotion of forest events and establishing partnerships with other campaigning groups and professionals working in urban sustainability.
- 5.16 The Campaign set-up the Elephant and Castle Urban Forest Community Interest Company to underline the significance of the campaign and to enable the local community to take advantage of managing interim uses within the estate and plan events after the forest became less accessible.
- 5.17 The Campaign secured meetings with the developers, their consultants and the council during the consultation phase for Outline planning permission. The Campaign made the case for the retention of a significant proportion of the trees in the Urban Forest.

### Outcomes

- 5.18 Following the Campaign's proactive engagement with the developer, the masterplans for the Heygate Estate redevelopment were changed significantly with much less deforestation and a new park. Credit was given to the positive role of the Campaign in informing the new Masterplan.

### Before



After



- 5.19 In January 2013 the developer's (Lend Lease) 'Outline' planning application was approved by the planning committee by four votes to two and one abstention.
- 5.20 Furthermore, the [Forest Bank](#) campaign was launched by one of the Elephant and Castle Urban Forest Campaign founders, local resident Guy Mannes-Abbott, in May 2013. The Forest Bank Campaign aims to protect deforestation in Elephant and Castle.
- 5.21 Also in May 2013 the [Tree and Woodland Awards](#) announced the Re:Leaf Urban Forestry award to "The Balfour Street Resident's Group, the [Elephant Amenity Network](#) and [Forest Bank](#)" for the work in 2011.

## Three latest case studies from call for case studies

### Case Study: Mereway Nature Park, London Borough of Richmond-upon-Thames

#### Objectives

- 5.22 In late 2002, the London Borough of Richmond-upon-Thames announced a change to its [Unitary Development Plan \(UDP\)](#) , proposing the removal of Metropolitan Open Land (MOL) status (Plan Policy 7.17) from a number of public open spaces, including the old allotment site at Mereway in Twickenham, on the north bank of the River Crane. This proposal was subsequently revealed as a precursor to the proposed sale of this land for housing development.
- 5.23 There was considerable local opposition to this proposal and this coalesced to form '[Friends of the River Crane Environment](#)' (FORCE), initially as a local community group. The group set about championing the retention of Mereway as a public environmental and community resource.

#### Approach

- 5.24 In late 2003 the UDP review went to Public Inquiry and FORCE put its case as to the existing value of this land in its own right as an environmental site, and also as a part of the west London Green Chain, a largely unbroken environmental corridor that runs through west London for around 20 miles from Harrow to the Thames at Isleworth. FORCE put forward an alternative management plan for the future of Mereway as a nature park and pledged to deliver it should their appeal be successful. The plan was approved and permission for the removal of Mereway's MOL status refused.
- 5.25 One of FORCE's first acts was to install a notice board setting out the value of the site and re-naming it "Mereway Nature Park" and information boards highlighting Mereway's habitats – bramble, nettle and woodland scrub – and their value. The boards changed public perceptions of the value of the site.
- 5.26 For the last ten years, FORCE has organised annual volunteer days with partners such as [The Conservation Volunteers](#) and [Environment Trust for Richmond](#) to manage and enhance the site. Around five years ago, Mereway started to be used as an outdoor classroom by local school, such as Trafalgar Primary and Archdeacon Primary School. Lesson Plans for Foundation, Key Stage 1 and Key Stage 2 classes have been produced.
- 5.27 Work is currently underway to designate the site as a [Site of Importance for Nature Conservation \(SINC\)](#).

#### Outcomes

- 5.28 Once a disused allotment site used as a dumping ground for local rubbish, Mereway is now formally recognised by the Council and local people as 'Mereway Nature Park'. The incidences of fly tipping have been dramatically reduced, and when it does happen it is reported by local people and removed promptly by the council.
- 5.29 The lessons learned at Mereway by FORCE are being developed and applied to a number of other sites along the lower Crane valley, for example Twickenham Rough Case Study. Ten years on, FORCE is a registered charity with over 450 largely local members and a commitment to the improvement of the Crane valley for the benefit of the environment and local people.

## Case Study: Twickenham Rough, London Borough of Richmond-upon-Thames

### Objectives

- 5.30 In 2011, Twickenham Rough, a 1.5 hectare local Metropolitan Open Land (MOL) (London Plan Policy 7.17) and [Site of Importance for Nature Conservation \(SINC\)](#), was purchased as a potential development site. Located beside the River Crane in the London Borough of Richmond-upon-Thames, Twickenham Rough represents a key link in the River Crane corridor which runs between Twickenham Station and the large open spaces of Craneford Fields and Crane Park. The Rough represents an important green link in the [Friends of the River Crane Environment's](#) (FORCE) '[Vision for the lower Crane Valley](#)', which involves the creation of a new metropolitan park that would join these disparate spaces along the lower Crane to create a continuous green chain from Twickenham Station in the east to Hounslow Heath some 5 km to the west.

### Approach

- 5.31 FORCE commissioned a [feasibility study](#), supported by the London Borough of Richmond-upon-Thames, the London Borough of Hounslow and the [London Wildlife Trust](#) (LWT), to investigate the potential of developing the new metropolitan park. The study investigated bringing Twickenham Rough into public use as an environmental and community asset. Initial land valuation works were undertaken in support of this.
- 5.32 In 2011, the London Borough of Richmond-upon-Thames launched the [Twickenham Area Action Plan](#) Supplementary Guidance Document, which contained plans for the 'Twickenham Northern Gateway' in and around Twickenham Rough. FORCE was an important consultee, submitting proposals to improve the environmental value and increased community access to the Rough and other sites along the lower Crane.
- 5.33 In 2012, plans for re-developing Twickenham Rough were proposed to Richmond Borough Council and FORCE. FORCE played an active role in developing the proposals, through a series of meetings with council officers and the developers, and attending several public meetings where the scheme options were debated. In addition, FORCE held meetings of its own with local people who had concerns about opening the Rough to the public.
- 5.34 In early 2013, a planning application for a new pathway through the Rough was submitted to Richmond Borough Council alongside plans for a new development. Separate agreements were drafted for the transfer of the land into public ownership, subject to the proposals receiving planning permission. FORCE supported the scheme in principle and spoke in support of the proposals at the subsequent planning committee meeting, where the scheme was approved.

### Outcomes

- 5.35 Approval was given under the condition that a new local Advisory Group, containing representatives from local residents, Richmond Borough Council and FORCE, would be set-up to guide the detailed design and management of the site.
- 5.36 FORCE is hopeful that this agreement will result in the long term security of Twickenham Rough as a site of wildlife and community value – a new open space for local people to enjoy as well as a new green route between Twickenham Station and the lower Crane valley to the west.
- 5.37 Optimising the value of the site for wildlife and local people will require careful ongoing management, with the support of the Advisory Group and the active engagement of local people in its longer term management. FORCE is hopeful that the lessons learned on other sites along the Crane valley, such as those at Mereway Nature Park Case Study, can be adapted and applied to this major new site.

## Case Study: [Former Goods Yard](#), Barnes Common, London Borough of Richmond-upon-Thames

### Objectives

- 5.38 [Part of](#) Barnes Common was compulsorily purchased for railway use in 19<sup>th</sup> century and used as a goods yard at Barnes Station. In the 1980's it was released by the railway and sold into private ownership despite the original compulsory purchase containing a covenant that the land be ~~returned to developed as~~ Barnes Common if no longer required for railway use. (An Act of Parliament in 1976 rendered the covenant unenforceable). Thus, the Common was at risk from development that would result in the permanent loss of this community and environmental asset.
- 5.39 The London Borough of Richmond-upon-Thames and the [Friends of Barnes Common](#) (FoBC) recognised its value and set about planning to maximise its long-term social, ecological and economic value for the local community and environment.

### Approach

- 5.40 After several unsuccessful and unpopular planning applications by several owners in the 80's and 90's, the London Borough of Richmond-upon-Thames, in consultation with FoBC, produced [Supplementary Planning Guidance](#) in the form of a 'Site Brief' for an enabling development, the sole purpose of which was to maximise the amount of land to be returned to Barnes Common for the benefit of local wildlife and the local community. FoBC persuaded the Council to specify that built development should be away from the centre of the site, and not close to Barnes station, to ensure the integration of most of the land with the rest of the Common.
- 5.41 A Planning application was made by DP9 on behalf of Fulcher Development, which sought to build 14 apartments in two blocks and return approximately 65% of the site to the common as restored acid grassland. FoBC objected on the grounds that the scheme failed to maximise the return of land to the Common. Furthermore, FoBC suggested that existing soil be used to provide additional calcareous grass meadow adding to biodiversity.

### Outcomes

- 5.42 The scheme was reconfigured to retain the 14 apartments but return approximately 75% of the site to the Common and planning consent was obtained.
- 5.43 FOBC continues to monitor the full discharge of the planning conditions attached to the schemes consent, such as the installation of green walls, the creation of the calcareous grass meadow and the position of and size of the site's fencing to maximise the open aspect of the Common. This highlights the need not only to argue a case during the planning stage, but to ensure the local authority includes all conditions in any subsequent agreement and that its Building Enforcement Officer ensures conditions are met in full.