

The Mayor

By email to yourviews@gla.gov.uk

8 December 2016

Dear Mayor,

CPRE London's response to your consultation 'A City for All Londoners'

CPRE London is the London branch of the Campaign to Protect Rural England. We are a membership based charity concerned with the protection and enhancement of London's Green Belt, Metropolitan Open Land and urban open and green spaces. We have over 2,700 members. CPRE London members also have a wider interest in parks and open spaces, green infrastructure and compact development.

Thank you for the opportunity to respond to this important consultation. Our thoughts are as follows:

LONDON'S PROTECTED GREEN SPACES

There is no need to build on our precious, protected green spaces - we do not need to lose this land and we must not lose this land: it has a critical role in London's future

Building on protected green spaces is wholly unnecessary: there are hundreds of thousands of planning permissions in London which have yet to be built out and there are vast opportunity areas - small and large - which can accommodate hundreds of thousands more dwellings.

There is an absolutely critical continuing role for protected green space within the London Plan.

Councils which seek to de-designate Metropolitan Open Land or Green Belt should be rigorously challenged: it is rare case that protected land no longer fulfils its purpose and councils aiming to de-classify land on weak arguments to that effect, or for example without demonstrating the harm which would be done by removing strategic protected green space from London, should be challenged.

Building on green space, including Green Belt, cannot and will not solve any housing crisis. Yes we need more homes, but current targets are inflated and arbitrary.

Moreover, increasing supply will not bring house prices down, create homes for social rent or reduce rents in privately rented accommodation.

Yes we need to build more but this can be accommodated without taking green space. Only in 2014 did household numbers overtake dwelling stock in London so it is not the case that, as government says “we have not been building enough homes for decades”. In terms of the future, there is good evidence to show that government guidance asks local authorities to base their housing plans on aspiration rather than need. The result is that targets are arbitrary and inflated, “based on made-up numbers that the construction industry has neither the will nor the capacity to meet.”¹

London’s crisis is mainly about affordability, not simply about having enough houses. But increasing supply doesn’t bring house prices down. Nor does it create lower rents.

Most green belt developments we have seen are, because of their location, very expensive.

London risks taking it’s Green Belt and Metropolitan Open Land in the name of the ‘housing crisis’ and ending up with expensive developments which do nothing to resolve London’s housing problems – but which remove strategically important open land which a bigger, denser London will rely heavily upon for its air quality, flood management, sports/recreation, human health, biodiversity and much more. Urban sprawl has real impacts on air and wider environmental quality, leads to transport poverty and is associated with many other problems.

If you want to save your parks, like the Lea Valley Regional Park which Waltham Forest is currently proposing to allocate for development, then the starting point should be that protected land should not be developed in the name of housing which cannot do anything to tackle affordability of housing and which could readily be placed on non-green sites.

LONDON’S PARKS

No-one is responsible for maintaining our parks and green spaces which leaves them vulnerable to dereliction and ultimately being lost to development

Local authorities have maintained parks over the years because they know how much difference they make to local communities. But parks maintenance, unlike social care or

¹ <http://www.cpre.org.uk/resources/housing-and-planning/housing/item/4158-set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside>

rubbish collection, is not a statutory service. Consequently, councils find it harder and harder to allocate money for it.

As a result, London parks budgets are now at around one third of what they need to be to avoid dereliction and to avoid losing the significant benefits they provide

Reduced funding is having a knock-on effect in reducing the help parks managers receive through community groups as well. It also means we are fast losing expertise within councils as they are forced to lay off experienced parks officers.

We must give councils a formal responsibility for managing parks to a high standard and give them the funding to do it

Councils have developed expertise in how to manage parks efficiently and effectively. They know the kinds of things which make parks attractive, well-used spaces. These things are encapsulated in the Green Flag standard and a duty should be placed on councils to manage parks to this standard and to work collectively to continuously improve this standard.

Parks services are relatively cost-effective in terms of the significant benefits they provide: we should maintain the investment in them at appropriate levels rather than let them become derelict. In London we need to aim for a total budget of around £250m - £300m a year

We calculate that just 0.15% of public money spent in London is spent on parks. We think this is out of kilter with the benefits parks provide in terms of health, environment and leisure.

Parks should be funded through taxation: this is the only way to provide secure funding into the future. Councils must continue to allocate resources to parks but London or national government funding needs to fill the gap.

Other ways to fund parks have been suggested - for instance, running commercial events in parks, putting parks in Trusts to be funded through endowments, or relying on volunteers - but these cannot achieve secure parks management in the long term and they have large hidden costs.

Local authority funds could be matched with London or national government funds:

- create Pfl, like Transport for London (TfL), but Parks for London, with funds raised through a precept on the council tax bill
- central government ring-fenced grant

- public health budgets - in which case the Green Flag Standard will need to make explicit mention of best practice in using parks to improve health outcomes locally.

We can get so much more out of London's parks and green spaces by supporting the Friends movement - there is vast potential.

Usually it is where there is an active Friends Group supported by effective local authority management that parks become, over time, better used. We can harness Friends Groups' ideas and promote them. We can target some of the 2,400 parks and green spaces in London which currently don't have a friends group and encourage local communities to create one - possibly targeting areas of ill-health. Remember that friends or volunteer groups are more effective when they work with local authority parks managers - so we need that basic investment to make this work.

I hope these comments are helpful.

Yours sincerely
Alice Roberts
Head of Green Space Campaigns
CPRE London
alice@cprelondon.org.uk
07792942691