



**Landscape
Institute**
Inspiring great places

Mr Clive Betts MP
House of Commons
London
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8 December 2016

Dear Mr Betts,

Green infrastructure and the Communities and Local Government Select Committee inquiry into Public Parks

During the oral evidence session (14 November 2016) to your Committee, at which the Landscape Institute and TCPA appeared, a question was posed by Julian Knight MP as to whether the planning system, as currently constituted, properly protects our public parks and open spaces.

There was general consensus among the panellists that the National Planning Policy Framework (NPPF), and its accompanying National Planning Practice Guidance (NPPG), currently offers adequate protection from development in existing green spaces. Paragraph 74 of NPPF is clear on the circumstances in which it may, or may not, be appropriate for development to take place.

However, subsequent questions from Committee members did not explore the ways in which NPPF might be improved to enhance existing spaces, and ensure that the green infrastructure (GI) is planned, designed and managed to achieve multiple benefits for society.

The Landscape Institute and the TCPA believe strongly that NPPF could be improved easily to help reimagine our green spaces and GI to help meet the needs of the future. In her final point to the Committee, the TCPA's Julia Thrift commented that *"...we know about all the benefits that green spaces and GI provide. They are providing that without us really trying. We are not designing, managing and maintaining green spaces for optimum value to society. If we really, really tried the potential is enormous."*

You helpfully responded, in your closing remarks, that this represented *"...a good challenge for the Committee, as well as everybody else, to take that sentiment on board and see how we can develop it"*.

The Landscape Institute and the TCPA have reviewed the NPPF and note the following:

- There is one reference to parks in the NPPF (paragraph 132), but this refers to those parks on the historic register of which there are only approximately 1,600 (a point made by fellow panellist Dr Layton-Jones).
- Paragraphs 76 – 78 of the NPPF refer to the Local Green Space designation. However we believe, despite accompanying guidance in the NPPG, that this policy is extremely unclear in terms of its aim, the process for designation or how land, once designated, should be managed for the benefit of society.
- GI itself is only referred to twice in the NPPF. The first (paragraph 99) relates to climate change and GI's role in adaptation. The second (paragraph 114) states that planning authorities should adopt a strategic approach to the *“creation, protection, enhancement and management of networks of biodiversity and green infrastructure”*.

It is clear to us that the NPPF is inadequate in terms of a coherent message which supports parks as a key component of GI, and fails to reposition them as assets to help meet a range of challenges. It is our view that it could be improved radically, in the following ways:

- Greater consistency in terminology – e.g. green space, open space, public space and GI.
- GI definition, as it appears in the glossary to NPPF, being consistently applied throughout.
- Improvements to paragraphs 178 – 181 which refer to the need for local planning authorities to have a Duty to Cooperate. GI, as the network of natural systems within and between settlements, does not respect administrative boundaries. Local planning authorities need to consider how their plans for GI may impact on, and interact with, those of neighbouring authorities.
- GI could be specifically referred as an important mechanism for delivery of various policy objectives in other chapters of the NPPF, such as those relating to:
 - Ensuring the vitality of our town centres
 - Promoting sustainable transport
 - Delivering a wide choice of high quality homes
 - Requiring good design
 - Promoting healthy communities
 - Meeting the challenge of climate change, flooding and coastal change
 - Conserving and enhancing the natural

This final sub-point would mirror changes made to the NPPG during 2015/2016, which saw the Landscape Institute and the TCPA working collaboratively with DCLG to improve content relating to GI. However the improvements made have not been replicated in the Framework itself.

We acknowledge that amending NPPF is unlikely to be an attractive proposition for Government. But the consultation conducted by DCLG earlier this year, which explored how NPPF might be improved to help address the current housing shortfall, indicates that where there is an appetite to do so, changes can be made. We would argue that amending policy to help ensure that making best use of GI to meet a range of future challenges would be extremely worthwhile.

We are not encouraged by the Government's very weak response to the House of Lords Select Committee report, Building Better Places. In its report, the Committee stated that Government *"...must do more to protect and promote Green Infrastructure in national policy and guidance..."*

Even if changes to the NPPF were made, we would also like to draw your attention to the Impact Assessment for the NPPF. This Assessment, from DCLG itself, recognised the potential problems in securing new and enhanced GI:

"The wider benefits to society of green infrastructure in terms of its environmental and recreational functions are not usually valued in the price of land in the land market and therefore green infrastructure is likely to be undersupplied by private agents; this is an example of market failure where government intervention is necessary"

We believe that this is a critical point – that DCLG has acknowledged that reliance on the private sector will be insufficient in delivering the GI that we need. Yet we cannot see that Government support – financial or in terms of policy – has done much to address this.

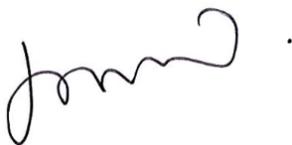
In addition to the potential to improve the NPPF, we are aware that Defra is currently leading on the development of the Government's 25 Year Environment Plan. It is our understanding that this Plan will cut across all Government departments and that a Framework will be consulted upon soon. We consider that the Plan represents a useful opportunity for ensuring that GI is properly embedded in planning and decision-making in the longer term, and that your Committee's inquiry has come at a critical time in planning for the future.

If there is any way in which these points might be considered as part of your Committee's deliberations then we would be most grateful. If you would like to meet to discuss these ideas in greater detail then we would be delighted to do so.

Yours sincerely,



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