



Lewisham Open Space Review

Lewisham Council

Prepared by LUC

May 2022

Version	Status	Prepared	Checked	Approved	Date
4	Report	MP	MP	MP	09.05.2022



Land Use Consultants Limited

Registered in England. Registered number 2549296. Registered office: 250 Waterloo Road, London SE1 8RD. 100% recycled paper

Lewisham Open Space Review

Contents

Chapter 1	6
Introduction	
Structure of this report	
Chapter 2	9
Methodology	
Step one: planning policy review	9
Step two: review of open space data	9
Step three: A Review of open space boundaries	10
Step four: Establishing designation for open spaces within a hierarchy	11
Chapter 3	12
Policy review	
National	
National Planning Policy Framework	12
National Planning Practice Guidance	
Regional context	
The London Plan 2021	18
All London Green Grid Supplementary Planning Guidance on Green Infrastructure and Open Environments 2012	22
All London Green Grid: The South East London Green Chain Plus Area Framework 6	23
London Environment Strategy	24
London Infrastructure 2050 Update	24
Natural Capital: Investing in Green Infrastructure for a Future London	24
Lewisham Open Space Review	3

Contents

2020 London Urban Forest Plan	25
London Square Preservation Act 1931	25
Open Space Strategies Best Practice Guidance	26
Local context	

Lewisham Core Strategy	26
Lewisham Local Plan review	28

Chapter 4 **31**

Review of open space evidence base

Additional open spaces	32
Review of open space typologies	34
Review of open space boundaries	39
Revised number of open spaces by typology	41

Chapter 5 **43**

Open space designations within a hierarchy

Establishing a hierarchy of designations

The hierarchies of open space designations

Metropolitan Open Land and Local Green Space	45
Strategic Open Space	46
Neighbourhood Open Space	48
Conclusion	

References **50**

Appendix A **53**

Contents

Selected review of open space policy adopted by surrounding authorities

Appendix B **64**
List of Formal and Informal Amenity Green Space

Table of Tables

Table 4.1: Open spaces identified in 2020 Open Space Assessment by London Plan categorisation	31
Table 4.2: Open spaces identified in 2020 Open Space Assessment and Parks and Open Space Strategy 2020-2025 by typology	32
Table 4.3: Revised number of open space by typology	41

Chapter 1

Introduction

1.1 LUC was appointed to carry out an Open Space Review to support Lewisham's new Local Plan preparations. The review will provide up-to-date technical evidence, building upon the Open Space Assessment 2020, Re-survey of Sites of Importance for Nature Conservation 2016 and the Parks and Open Space Strategy 2020-2025. The Open Space Review also seeks to establish the designation of open spaces within a clear hierarchy. The results of the Open Space Review will inform policy development concerning how open space designations are structured and subsequently assigned, particularly for open space outside of Metropolitan Open Land. It will also help to reinforce the borough's spatial strategy regarding the protection and sensitive management of open spaces over the new Local Plan period (2020 to 2040).

1.2 The purpose for the Open Space Review is to complete a:

- Desktop review of the Council's Open Space Assessment
- Desktop review of open space boundaries
- Focussed review of SINCs
- Establish designations for open spaces within a hierarchy

1.3 The key objectives and responsibilities for the study include:

- Approach to be in accordance with a robust methodology consistent with the requirements of the National Planning Policy Framework and its associated planning guidance and the new London Plan. The approach should also reflect current best practice guidance.
- Define the methodology followed throughout the preparation of the review including setting out any assumptions or factors which form part of the analysis and criteria.

- Provide a summary of the relevant higher level planning policies and guidance.
- Desktop review of the borough's existing open space evidence base completed as part of the Open Space Assessment 2020 to ensure:
 - All open spaces are consistent in their interpretation and application to the categorisation of typologies in accordance with Planning Policy Guidance 17
 - Identify any open space omitted from the existing open space survey and with those identified provide relevant site information and assign the appropriate Planning Policy Guidance 17 typology and map site boundaries.
 - Produce a schedule of changes which accompanies the review so that changes can be identifiable
- Establish a hierarchy of designations for open spaces that is both proportionate and responsive to open space typologies and the long-term needs of Lewisham. The hierarchy should be underpinned by robust criteria, reflecting best practice that accounts for several factors including public accessibility and nature conservation value.
- Complete a streamlined assessment of each open space within the borough against the criteria devised including recommendation on its appropriate designation within the hierarchy established.
- Complete a desktop boundary review of open spaces proposed for designation to ensure site boundaries accurately reflect the spatial extent of the open space.

1.4 An assessment and recommendation on the SINC status is covered in a separate report.

Structure of this report

1.5 This report is structured as follows:

- Chapter 2 sets out the study methodology.

- Chapter 3 sets out the planning policy framework within which this study has been undertaken and sets out the strategic context for the assessment.
- Chapter 4 provides detail on findings of the open space review.
- Chapter 5 defines the open space designations and hierarchies.

Chapter 2

Methodology

2.1 The methodology for the assessment of open spaces in Lewisham reflects the requirements of the National Planning Policy Framework 2021 and has been informed by recognised guidance on planning for open space and play space. The methodology followed four key steps and each is described in detail below.

Step one: planning policy review

2.2 A review of the higher-level planning policies and guidance was completed to understand the context for open space provision in Lewisham. This included a review the National Planning Policy Framework and its associated National Planning Practice Guidance as well as the new London Plan 2021 and current good practice. A selected review of open space policies set out by other local authorities was also completed (see **Appendix A**).

Step two: review of open space data

2.3 The open space data set out within the Open Space Assessment (2020) was reviewed to:

- Identify any omitted open spaces; and
- Remedy any inconsistencies in the categorisation of functional typologies.

2.4 A list of sites missing from the Open Space Assessment was prepared by Lewisham Council. GIS mapping and aerial photography was also used to capture any further open spaces that were not captured by the 2020 Assessment, but which were considered to warrant further consideration for the

Local Plan review. Relevant site information and Planning Policy Guidance 17 typology was recorded for new sites alongside the mapping of the site boundary to ensure a complete and consistent database.

2.5 Open space typologies set out in the Open Space Assessment data was reviewed against aerial imagery and the data updated to ensure a consistent categorisation which would tie in with that outlined in Planning Policy Guidance 17. This stage was carried out in consultation with the Council and a draft list of proposed changes was presented for review prior to being progressed for further consideration in the Study. This list included a schedule to identify changes made.

2.6 Typologies describe the character and functionality of an open space. They therefore differ from designations in that the typology does not afford any form of policy protection.

Step three: A Review of open space boundaries

2.7 A review of the boundaries of open spaces was completed to identify any inconsistencies and errors in mapping.

2.8 GIS was used to ensure boundaries are tightly drawn and accurate to reflect the true spatial extent of the open space. GIS shapefile layers were issued at the end of the study to ensure accurate transfer of the boundary information.

Step four: Establishing designation for open spaces within a hierarchy

2.9 Identification of robust criteria (as set out in Section five of this report) for establishing open space hierarchies were developed. This was based on a review of planning policy, current good practice and in consultation with the client, to establish a hierarchy of open space designations. Consideration was given to Metropolitan Open Land forming the highest tier of the hierarchy with tiers below established as part of this process. Open space designations were identified through understanding:

A) How PPG17 typologies of open space correlate to a hierarchy of open space designations; and

B) How other factors such as public access and nature conservation are accounted for within the criteria deployed to warrant the appropriate open space designation.

2.10 A streamlined assessment was completed of each open space within the borough against the criteria devised followed by a recommendation on its appropriate designation within the hierarchy established.

2.11 This work was carried in parallel to a MOL Review Update.

Chapter 3

Policy review

3.1 The following section provides a summary of the relevant national, London (regional) and local planning policy.

National

National Planning Policy Framework

3.2 The rationale for undertaking an assessment of open space and play space in the borough is provided by the National Planning Policy Framework (2021), which outlines the importance of green infrastructure provision (including open space and sports) to the development of a Local Plan.

3.3 Paragraph 92 requires that planning policies and decisions should aim to achieve healthy, inclusive, and safe places, referencing safe and accessible green infrastructure, sports facilities, and high-quality public space as a means to achieving this.

3.4 Paragraph 93 highlights that planning policies should support social, recreational, and cultural facilities and services which the community needs including planning positively for the provision of shared spaces and community facilities such as sports venues and open space.

3.5 Paragraphs 98 and 99 of the National Planning Policy Framework state:

“Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date

assessments of the need for open space, sport, and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

a) an assessment has been undertaken which has clearly shown the open space, buildings, or land to be surplus to requirements; or

b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”

3.6 Paragraph 174 states that a strategic approach to plan making should be undertaken to ensure that, within the plan area, networks of habitats and green infrastructure are maintained and enhanced as well as planning for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

3.7 Paragraph 175 states that Plans should distinguish between the hierarchy of international, national, and locally designated sites.

3.8 Paragraph 179 states that to protect and enhance biodiversity and geodiversity, plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including sites designated for biodiversity, wildlife corridors and steppingstones.

3.9 The National Planning Policy Framework provides a mechanism by which local authorities and neighbourhood planning forums can protect some open spaces under a ‘local green space’ designation (paragraphs 101 and 103) and sets out that these areas should be managed by policies which are consistent with those for Green Belt and sets out high level criteria for such designations. Paragraphs 101 - 103 state:

“The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period.

The Local Green Space designation should only be used where the green space is:

- *in reasonably proximity to the community, it serves.*
- *demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *local in character and is not an extensive tract of land.*

Policies for managing development within a Local Green Space should be consistent with those for Green Belts.”

National Planning Practice Guidance

3.10 National Planning Practice Guidance provides further detail on the development and implementation of policies within the National Planning Policy Framework. Guidance for open space, sport and recreation facilities, public rights of way and local green space states that in assessing the need for open

space, local authorities should have regard for the duty to cooperate where open space serves a wider area.

“Open space should be taken into account in planning for new development and considering proposals that may affect existing open space. Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors, and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure, as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development.

3.11 The National Planning Practice Guidance also states that it is for local planning authorities to assess the need for open space and opportunities for new provision in their areas. The guidance also advises that authorities and developers refer to Sport England guidance in assessing the need for sports and recreation facilities and that they may need to consult Sport England where development has the potential to impact upon such facilities.

3.12 The guidance recognises green infrastructure as a network of natural capital assets (including parks/open space, woodlands, allotments etc.) that provide multiple environmental and quality of life benefits for local communities.

3.13 The National Planning Policy Framework requires that a strategic planning approach is taken for green infrastructure. The guidance recommends planning authorities prepare green infrastructure strategies and frameworks that are evidence based and include assessments of the quality of green infrastructure and any gaps in provision.

Environment Act 2021

3.14 The Environment Act sets the groundwork for the Government’s ambition for the environment. The Act re-focuses the Habitats Regulations toward the objective to conserve and enhance biodiversity. It includes a legally binding

target to halt species loss by 2030 and, in support of this, a duty on local authorities to review every five years all policies with regard to nature conservation.

3.15 Local Nature Recovery Strategies are a form of spatial strategy with the principal purpose to help reverse the ongoing decline of biodiversity in England and ensure local areas contribute to the national Nature Recovery Network.

Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation

3.16 Planning Policy Guidance 17 was replaced by National Planning Policy Framework and the Assessing Needs and Opportunities companion guide was cancelled by National Planning Practice Guidance in 2014. However, the Companion guide is still accepted as offering a robust methodology as National Planning Policy Guidance does not offer alternative methods for assessing open space provision. The typologies set out within the companion guide are recognised throughout the London and England as understanding the primary functionality of an open space. These typologies also underpin the Lewisham Parks and Open Space Strategy 2020 – 2025.

3.17 These typologies are described below.

■ **Parks and Gardens:**

Urban parks, country parks and formal gardens. Accessible, high quality opportunities for informal recreation and community events. More multi-functional than other open space, offering space for quiet relaxation as well as a range of amenities and activities for visitors. Parks often include children's play, youth and/or outdoor sports facilities.

■ **Natural and Semi-natural Greenspace:**

Access to nature, wildlife conservation, biodiversity and environmental education awareness.

- Amenity Greenspace:

Opportunities for informal activities close to home or work. Amenity Greenspaces provide a less formal green space experience than park and gardens, with generally fewer facilities and habitats.

- Cemeteries, Churches and Disused Churchyards:

Quiet contemplation and burial of the dead, often linked to the promotion of wildlife conservation and biodiversity.

- Provision for Children and Young People:

Areas designed primarily for play and social interaction involving children and young people, such as equipped play areas, ball courts, skateboard areas and teenage shelters.

- Allotments, Community Gardens and Urban Farms:

Opportunities for those people who wish to do so to grow their own produce as part of the long-term promotion of sustainability, health and social inclusion.

- Outdoor Sports Facility:

Participation in outdoor sports, such as pitch sports, tennis, bowls, athletics, or countryside and water sports:

- Civic and market squares and other hard surfaces areas designed for pedestrians

Providing a setting for civic buildings public demonstrations and community events.

- Green Corridor:

Providing opportunities for walking, cycling or horse riding, whether for leisure purposes or travel, and opportunities for wildlife migration

3.18 The typologies relate to both public and private spaces and deliberately excludes incidental areas of land, such as roadside verges which are not intended for a specific use.

Regional context

The London Plan 2021

3.19 The new London Plan was published in March 2021 and forms the spatial development strategy for Greater London. The document sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. Many of the principles within the new Plan are based upon the Mayor's Environment Strategy which sets out the ambitious commitments for London by 2050.

3.20 Policies of most relevance to open space include:

- Policies G1-G9 on green infrastructure and natural environment. The plan highlights that London's network of green and open spaces, and green features in the built environment should be protected and enhanced (policy G1). It also states that boroughs should prepare their own green infrastructure strategies to act as an evidence base for development plans (policy G1).
- Policy G4 states that open space needs assessments to inform policy, identify areas of deficiency and address any deficiencies based on need. Development Plans should include appropriate designations and policies for the protection of open space and meets needs and address deficiencies.

3.21 Publicly accessible open space noted in the London Plan is categorised by size as follows:

- Regional parks:

These are large areas, corridors or networks of open space, the majority of which will be publicly accessible and provide a range of facilities and features offering recreational, ecological, landscape, cultural or green infrastructure benefits. They offer a combination of facilities and features that are unique within London, are readily accessible by public transport and are managed to meet best practice quality standards (size guideline 400 ha).

- Metropolitan parks:

These are large areas of open space that provide a similar range of benefits to Regional Parks and offer a combination of facilities at a sub-regional level. They are readily accessible by public transport and are managed to meet best practice quality standards (60 ha).

- District parks:

These are large areas of open space that provide a landscape setting with a variety of natural features. They provide a wide range of activities, including outdoor sports facilities and playing fields, children's play for different age groups and informal recreation pursuits (20 ha).

- Local parks and open spaces:

These provide for court games, children's play, sitting out areas and nature conservation areas (2 ha).

- Small open spaces:

These include public gardens, sitting out areas, children's play spaces or other areas of a specialist nature, including nature conservation areas (under 2 ha).

- Pocket parks:

These are small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and play equipment (under 0.4 ha)

- Linear open spaces:

These are open spaces and towpaths alongside the Thames, canals and other waterways, paths, disused railways, nature conservation areas and other routes that provide opportunities for informal recreation. They can often be characterised by elements that are not public open space but that contribute to the enjoyment of the space.

3.22 Other policies set out in the London Plan relating to open space provision are described below.

- The threat from development to biodiversity is addressed, with policy G6 stating that development proposals are to be developed with habitat connectivity, sustainable access to habitat, and biodiversity at the start of the process, with the aim of achieving net biodiversity gain, reducing habitat severance and access deficiencies.
- Policies GG2 and GG3 on planning London's future through good growth policies, to make the best use of land through protecting open space, promoting the creation of new green infrastructure and urban greening, and improving access including planning sustainable travel options.
- Policies S1, S3, S4, and S5 on social infrastructure, with the importance of green infrastructure recognised as a key component of social infrastructure. Boroughs should develop play and informal recreation strategies (policy S4) and regularly assess the need for sports and recreation facilities at the local and sub-regional level (policy S5).
- Policies S13, S14, S16, S17 on sustainable infrastructure including SUDs within development and the network of waterways which should be integrated into a linked, accessible transport network and improved for their habitat, amenity, and recreation value.

Metropolitan Open Land

3.23 Policy G3 of the London Plan relates to Metropolitan Open Land. Metropolitan Open Land is afforded the same status and level of protection as Green Belt:

- Metropolitan Open Land should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt.
- Boroughs should work with partners to enhance the quality and range of uses of Metropolitan Open Land. The extension of Metropolitan Open Land designations should be supported where appropriate.

3.24 Boroughs should designate Metropolitan Open Land by establishing that the land meets at least one of the following criteria:

- site contributes to the physical structure of London by being clearly distinguishable from the built-up area;
- site includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;
- site contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value; or
- site forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

3.25 Metropolitan Open Land is afforded the same status and protection as Green Belt land. Any proposed changes to existing Metropolitan Open Land boundaries must be accompanied by thorough evidence which demonstrates that there are exceptional circumstances consistent with the requirements of national policy.

All London Green Grid Supplementary Planning Guidance on Green Infrastructure and Open Environments 2012

3.26 This policy framework promotes the design and delivery of green infrastructure and open spaces across London, providing guidance on delivering green infrastructure to reflect the objectives and policies within the London Plan. The three aims of the framework are:

- to protect and enhance London's strategic network of green and open natural and cultural spaces, to connect the everyday life of the city to a range of experiences and landscapes, town centres, public transport nodes, the countryside in the urban fringe, the Thames and major employment and residential areas;
- to encourage greater use of, and engagement with, London's green infrastructure; popularising key destinations within the network and fostering a greater appreciation of London's natural and cultural landscapes; enhancing visitor facilities and extending and upgrading the walking and cycling networks in between to promote a sense of place and ownership for all who work in, visit and live in London; and
- to secure a network of high quality, well designed and multifunctional green and open spaces to establish a crucial component of urban infrastructure able to address the environmental challenges of the 21st century – most notably climate change.

All London Green Grid: The South East

London Green Chain Plus Area

Framework 6

3.27 The Area Framework helps to support the delivery of the All London Green Grid objectives. The Framework seeks to identify landscape-scale projects which can be delivered across administrative boundaries. The London Borough of Lewisham is located within the South East London Green Chain Plus Framework Area 6. The Framework notes the area is deficient in access to Regional Parks but has defined landscape of a sufficient size to present a clear Regional Park opportunities. It also identifies opportunities for addressing areas in deficiency through enhancing existing green infrastructure and bringing together open spaces to create a Regional Park facility. The objectives of the Framework includes:

- Increase access to open space and the Green Belt and urban fringe;
- Conserve landscape and the natural environment and increase access to nature;
- Adapting to climate change;
- Making sustainable travel connections;
- Enhancing distinctive visitor destinations and boosting the visitor economy;
- Promoting healthy living;
- Promote sustainable food production; and
- Promote green skills and sustainable design, management and maintenance.

3.28 The Framework also contains a number of actions relating to open spaces and green infrastructure within the borough including project 6.8 Waterlink Way and North Lewisham Links. This project aims to achieve green space improvements that tie in with existing and new town centre, residential and light

industrial developments, and provision of improved flood risk management through the creation of flood storage within the green spaces.

London Environment Strategy

3.29 Establishes the approach to tackle the environmental challenges facing the city to ensure that in 2050 the potential of London's environment to support good health and quality of life and to make the city a better place to live, work and do business is realised. The Mayor's aim is for a London that is 'greener', 'cleaner' and 'ready for the future' with the ambitious commitment that *'London will be the world's first National Park City, where more than half of its area is green, where the natural environment is protected, and where the network of green infrastructure is managed to benefit all Londoners'*.

London Infrastructure 2050 Update

3.30 The London Infrastructure update provides an overview of the city's infrastructure requirements and sets out how they will be met, including green infrastructure. The document describes how the Green Infrastructure Task Force will develop the evidence base to prove the many benefits of green infrastructure and will work to accelerate its delivery.

Natural Capital: Investing in Green Infrastructure for a Future London

3.31 Aims to deliver an ambitious vision for green infrastructure and reframes its value in tackling issues of governance, management and funding for delivery. In terms of governance, it highlights how fragmentation results in much of the network being considered as a series of individual spaces with local, or at best

borough-wide, objectives. There is a need to rectify this and think strategically across administrative boundaries.

3.32 The report recommends that London Borough's should:

- Ensure that the concept of green infrastructure is central to a placemaking agenda and properly represented within their placemaking teams;
- Plan, design and manage the green infrastructure network to deliver strategic functions as well as local needs;
- Support sub-regional green infrastructure partnerships. These partnerships should be funded by the Greater London Authority and match-funded by the boroughs; and
- Promote the benefits green infrastructure has for health and wellbeing to increase investment in future.

2020 London Urban Forest Plan

3.33 The 2020 Plan proposes a combination of better protection and management, of encouraging new planting and natural regeneration to grow the urban forest, and of valuing and promoting its benefits to landowners, managers and the wider public. Actions in the Plan relevant to the NRR include:

- Identifying priority woodland sites requiring management to maximise benefits for people and wildlife; and
- Working with social housing providers to develop London housing estates landscape enhancement programmes to increase canopy cover for climate resilience and resident wellbeing.

London Square Preservation Act 1931

3.34 The London Squares Preservation Action seeks to protect designated open space and ensure that their use is solely as an ornamental garden,

pleasure grounds or ground for play, rest or recreation. No building or structure should be created or placed on them unless such features are in support on maintenance of the square.

Open Space Strategies Best Practice Guidance

3.35 The Mayor of London's guidance on the preparation of open space strategies sets out steps required to complete a robust assessment of provision. It links to the Planning Policy Guidance 17 companion guide, suggesting an assessment of provision using the same typologies. However, hierarchies are linked to those set out within the London Plan, as a means to identify area of open space deficiency.

Local context

Lewisham Core Strategy

3.36 The Core Strategy seeks to protect open spaces and environmental assets. Core Strategy Objective 7 states that important environmental, ecological and biodiversity features of Lewisham will be protected and capitalised to promote health and wellbeing. This will be achieved through:

- Protecting all open space including Metropolitan Open Land;
- Protecting Sites of Importance for Nature Conservation and supporting and promoting local biodiversity;
- Improving the quality of, and safeguarding access to, all public open space; and
- Providing accessible and varied opportunities for health, leisure and recreational activities including the South East London Green Chain Walk,

the Green Grid, the Waterway Link and river and waterways network, and the Thames Path.

3.37 Core Strategy Objective 9 (Transport and accessibility) relates to transport and accessibility in the borough. It states that the Council will provide a system for walking and cycling routes and strong links to town centres and public open space. This includes the Waterway Link, and promoting the implementation of greenways.

3.38 Spatial Policy 1 states that open space, including Metropolitan Open Land and Sites of Importance for Nature Conservation, will be protected. A net gain of open space across the borough will be sought, particularly through on-site provision.

3.39 Core Strategy Policy 12 states that in recognition of the strategic importance of the natural environment and to help mitigate against climate change the Council will:

- Conserve nature;
- Green the public realm; and
- Provide opportunities for sport, recreation, leisure and well-being.

3.40 It continues by stating the above will be achieved through:

- Protecting the character, historic interest and amenity of open spaces including the effects of development outside their boundaries;
- Protecting Metropolitan Open Land, open space, urban green space and green corridors; and
- Maintaining and improving the publicly accessible open space network such as the Waterway Link, the Thames Path, the South East Green Chain, the East London Green Grid, parks and gardens, playing fields, nature reserves, allotments, community gardens, amenity green space, cemeteries and churchyards as well as small open space that have townscape quality.

Lewisham Local Plan review

3.41 Lewisham’s new Local Plan will set out a shared vision for the future of the borough through to 2040. The draft Local Plan: Main Issues and Preferred Approaches document, was published for a Regulation 18 stage public consultation during January to April 2021. There was a significant amount of interest and feedback on the proposals around green infrastructure and open space. In response, the Council is undertaking additional work on this policy topic area including this Open Space Review.

3.42 GR1 (Green Infrastructure) of the Local Plan highlights the important contribution Lewisham’s network of green and open spaces, waterways and green features make to local character and heritage. The Local Plan also acknowledges that these assets are integral to supporting sustainable communities and healthy lifestyles, providing a wide range of environmental, social and economic benefits. Green infrastructure should be protected and opportunities taken to enhance provision across the borough.

3.43 GR2 (Open space and Lewisham’s green grid) states that open spaces are integral components of green infrastructure and will be protected from inappropriate development. Neighbourhood forums are encouraged to undertake detailed assessments to identify appropriate sites to designate as Local Green Space in neighbourhood development plans.

3.44 GR3 (Biodiversity and access to nature) states the Council will seek to deliver net gains for biodiversity with nature conservation sites safeguarded and protected in order to preserve or enhance priority habitats and species. These sites will also ensure the public benefits from easy access to green spaces with wildlife value, particularly by walking and cycling.

Lewisham Parks and Open Space Strategy 2020 - 2025

3.45 The Lewisham Parks and Open Space Strategy sets out a series of actions to protect, maintain, and enhance parks and gardens, allotments, nature reserves, churchyards and highways enclosures owned or maintained by the London Borough of Lewisham.

3.46 The strategy seeks to protect the Council's existing parks and open space and to ensure the quality of provision meets the needs of existing and project population. The vision for strategy is to ensure the Council's parks and open spaces become: *"the heart and lungs for Lewisham, connecting active, healthy, and vibrant local communities"*.

3.47 Open space provision within the Strategy is assessed through the use of typologies aligned with those set out within the PPG17 Companion Guide:

- Parks and Gardens
- Children and Teenagers (play)
- Natural and Semi-natural Urban Greenspace
- Outdoor Sports Facilities
- Amenity
- Allotments and Community Gardens
- Green Corridors
- Cemeteries and Churchyards

3.48 A total of 349 open spaces were included in the Strategy. The London Plan distance standards are used to develop a hierarchy of public open space categorisations and to identify areas of deficiency.

3.49 The Strategy concludes with a series of Sub Area Action Plans which seek to protect and enhance the open space network.

Chapter 4

Review of open space evidence base

4.1 The following section provides a summary of the findings of a review of open space evidence base as set out in the Open Space Assessment 2020. A total of 354 open space were captured in the open space dataset received as part of this study. These were classified by categorisation and typology as set out in Tables 4.1 and 4.2.

Table 4.1: Open spaces identified in 2020 Open Space Assessment by London Plan categorisation

London Plan public open space categorisation	Number of open spaces
Regional Parks	0
Metropolitan Parks	2
District Parks	0
Local Parks and Open Spaces	90
Small Local Parks and Open Spaces	109
Pocket Parks	153
Linear Open Space	0
Total	354

Table 4.2: Open spaces identified in 2020 Open Space Assessment and Parks and Open Space Strategy 2020-2025 by typology

Typology	Number of open spaces
Allotments, Community Gardens and City Farms	46
Amenity Greenspace	90
Cemeteries and Churchyards	11
Children and Teenagers (play)	45
Green Corridors	62
Natural and Semi-natural Urban Greenspace	26
Outdoor Sports Facilities	24
Parks and Gardens	50
Total	354

4.2 The typology breakdown used in the Parks and Open Space Strategy correlate with the typologies outlined in PPG17 and promoted in the Mayor of London’s Guidance on Open Space Strategies Best Practice Guidance. This review will use the typologies from this guidance.

Additional open spaces

4.3 A review of the open space assessment and a review of the responses received through Regulation 18 of the Local Plan process identified a number of open spaces which had not been captured by the 2020 Open Space Assessment. A list of the significant open spaces by typology are set out below. These open spaces are recommended to be added to the open space evidence base as follows.

4.4 Open spaces falling with Parks and Gardens typology:

- Confluence Park
- Charlottenburg Park

4.5 Open spaces falling within the Natural and Semi-natural Urban Greenspace typology:

- Bridgehouse Nature Area
- Cox Wood
- Deptford Railway Meadow
- Grove Park Nature Reserve
- Buckthorne Cutting Nature Reserve (SINC)
- Honor Oak Road Covered Reservoir
- Ringway Centre Community Garden
- South of Prendergast Ladywell School

4.6 Open space falling within Allotments, Community Gardens and Urban Farms typology:

- Friendsbury Gardens
- Romborough Garden Allotment East
- Crofton Park Railway Garden
- Deptford Allotments
- Brockley Station Community Garden

4.7 Open space falling within Green Corridor:

- East of Hardcastle Close
- Ravensbourne River
- West of Broadway Fields

4.8 Open Spaces within Outdoor Sports Facilities:

- Goldsmith's College Tennis Court
- St Matthew's Academy Sports Ground
- Tudor Livesey Memorial Hall Bowling Green

4.9 Furthermore, 42 additional open spaces falling within Formal Amenity Greenspace have been identified. See paragraphs 4.10 – 4.12 below.

Review of open space typologies

4.10 The next stage of the review of the 2020 Open Space Assessment and Parks and Open Space Strategy 2020 – 2025 involved ensuring open space typologies were assigned consistently across all open spaces.

4.11 The review involved an assessment of open spaces considered to be functioning as amenity greenspaces. The assessment aimed to ensure the typology given to such sites sufficiently acknowledged the importance of sites to the borough's open space network. Subsequently it was decided the Amenity Greenspace typology to be divided into Formal Amenity Greenspace and Informal Amenity Greenspace. The definition of these typologies is provided below:

- Formal Amenity Greenspace

Green spaces which provide opportunities for informal activities close to home or work whilst also contributing to the character and morphology of the area.

- Informal Amenity Greenspace

Informal recreation spaces and green spaces in and around residential blocks but not exclusively relating to estate amenity space.

4.12 70 open spaces were identified as falling within the Formal Amenity Greenspace typology. **Appendix B** contains a list of open spaces included within this typology.

4.13 The review of typologies also considered where open space typologies should be amended to more accurately reflect the functionality of sites. The following sets out where typologies are recommended to be changed to align to the descriptions of open space typologies set out in PPG17 (see paragraph 3.17). A summary of these recommended changes follows.

Green Corridors

4.14 It is recommended that the typologies for Millwall Embankment and the River Quaggy are changed from Natural and Semi-natural Greenspaces to Green Corridor due to the linear character of these spaces as well as the opportunities for informal recreation.

Parks and Gardens

4.15 It is recommended the typologies of the following open spaces are changed from Amenity to Parks and Gardens:

- Aragon Gardens (formerly named Longshore Open Space North)
 - Justification: The open space contains features expected of an open space within this typology.
- Admiralty Square (formerly named Longshore Open Space South)
 - Justification: The open space contains features expected of park and gardens.
- Surrey Canal Linear Park (formerly named Old Canal)
 - Justification: The open space includes features expected of park and gardens including provision for children and teenagers.

- Staunton Street Green
 - Justification: The open space contains features expected of an open space within this typology.
- Kirkdale Green
 - Justification: The open space contains features expected of an open space within this typology.
- Cornmill Gardens
 - Justification: The open space, which includes features expected of Parks and Gardens including Provision for Children and Teenagers.
- Grove Park Library Gardens:
 - Justification: Open space which includes features expected of Parks and Gardens including provision for children and teenagers.

4.16 In addition, it is recommended the typology for Pool River Linear Park is changed from Natural and Semi-natural Urban Greenspace to Parks and Gardens. This is due to the open space containing features expected of a green space within this typology.

4.17 It is also recommended the typologies for the following sites were changed from Children and Teenagers to Parks and Gardens due to the broad range of facilities/ functions provided at these sites:

- Rainsborough Avenue/ Clement House
- Mary Ann Gardens
- Bellingham Play Park
- Horniman's Triangle

4.18 It is suggested the typology for Downham Playing Fields is changed from an Outdoor Sports Facility to Parks and Gardens due to the range of features this site supports.

Provision for Children and Young People

4.19 It is recommended the typologies for the following sites are amended from Amenity to Provision for Children and Young People. This is due to these sites primarily providing opportunities for play:

- Crutchley Road Housing Green
- Hexal Road Housing Green
- Scarlet Road Housing Green
- Honor Oak Estate Green
- Rocastle Road Estate
- Evans Road Housing Green
- Oslac Road
- Thurbarn Road
- Dartmouth Road Estate Green

4.20 In addition, it is recommended the typology of Hazel Grove Estate Playground is changed from Green Corridor to Provision for Children and Young People.

Natural and Semi-natural greenspaces

4.21 It is recommended the following open spaces change typologies from Amenity to Natural and Semi-natural greenspace due to the presence of features for nature conservation:

- Hillcrest Estate Woodland
- Tarleton Gardens
- Gilmore Road Park

- Lethbridge Close
- Creekside Discovery Centre
- Shaw Road Open Space
- Rainsborough Avenue Embankments

4.22 In addition, it is suggested the typology for Reigate Road Open Space is changed from Children and Teenagers to Natural and Semi-natural Greenspace due its nature conservation interest.

4.23 The typology for Albion Millennium Green should be changed from Parks and Gardens to Natural and Semi-natural greenspace as this space primarily supports features of nature conservation interest.

4.24 Furthermore, it is recommended the typologies of the following open spaces are changed from Green Corridors to Natural and Semi-natural greenspaces as they are considered to be standalone sites and contain features of nature conservation interest.

- British Gas Land Buffer Zone
- Goan Club, Ravensbourne Avenue

4.25 It is recommended the typology for Grangemill Way open space is changed from Natural and Semi-natural Greenspace to informal amenity space. This is due to the size of the open space combined with the range of features it supports.

Outdoor Sport Facilities

4.26 The 2020 Open Space Assessment recorded a number of schools within the borough within Children and Teenagers typology. These open spaces are predominantly playing fields and should therefore be included within Outdoor Sport Facilities. These schools include:

- Prendergast Ladywell School
- Sedgehill School
- Consiborough College
- Forest Hill School Sports Ground
- Sydenham High School Field

Review of open space boundaries

4.27 The 2020 Open Space Assessment data was also reviewed to ensure boundaries were recorded accurately to capture the true extent of open space. These reviews are inclusive of additional boundary changes relating to specific habitats, which are identified in the separate SINC report. Following this review, the boundaries of the following open spaces are recommended to be amended.

- Deptford Green School: boundary amended to acknowledge majority of site contains educational facilities.
- Part of St Dunstons College Sports Ground: boundary changed to reflect development.
- Conisborough College Open Space: boundary changed to exclude car park.
- St Mathew's Secondary School: boundary changed as mostly an educational facility.
- Bromley Hill Cemetery: boundary amended to exclude private gardens and community amenity space of the Swiftsden Way properties but to include areas of green space previously omitted.
- Rainsborough Ave/ Clement House: boundary extended to capture extent of the park.
- Millwall Embankment: boundary changed to differentiate between land that is publicly accessible and land included within the adjacent railway corridor.

- Blackhorse Road Allotments: boundary reduced to accurately capture the extent of the allotments.
- Evelyn Green: boundary changed to exclude car park.
- Grove Park Nature Reserve: boundary extended to align with SINC boundary.
- Ringway Community Gardens: boundary extended to align with proposed SINC boundary.
- Reigate Road Open Space: boundary extended to align with SINC boundary.
- Durham Hill: boundary changed to include outdoor sports facilities and park entrances.
- Downham Playing Fields: boundary changed to exclude residential development.
- Kendal Allotment: boundary extended to capture the full extent of allotments.
- Catford Wanderers Sports Club: boundary changed to exclude car park.
- Bellingham Leisure Centre: boundary changed to exclude car park.
- The Bridge Leisure Centre: boundary changed to exclude car park.
- Lewisham Indoor Bowls Centre (formally named The Bridge Leisure Centre East): boundary changed to exclude car park.
- British Gas Land Buffer Zone: boundary changed to align with proposed SINC boundary.
- De Frene Market Garden: boundary reduced to accurately capture the extent of the allotment.
- Hillcrest Estate Woodland: boundary changed to excluded residential development.
- Christ Church Chapel: boundary reduced to accurately reflect the extent of the churchyard.

- Sydenham Road Cutting: boundary extended to capture the extent of the railway cutting.
- Kings College Sports Ground (formerly named Honor Oak Sports Ground): boundary: boundary changed to exclude car park and school.
- Marry Ann Gardens (formerly named Crossfield Estate): boundary extended to capture the extent of the park.
- Forest Hill Bowls Club: boundary changed to exclude car park.
- Bellingham Bowling Club: boundary changed to exclude car park.
- Sayes Court Park: boundary extended to include play facilities.
- Home Park: boundary extended to include adventure playground.
- Trewsbury Road Allotments: boundary extended to capture full extent of allotments.
- Hatcham Gardens: boundary extended to capture the full extent of park.

Revised number of open spaces by typology

4.28 The Open Space Review has resulted in a number of recommended amendments to the data gathered through the 2019 Open Space Assessment. The following table sets out the revised number of open spaces by typology.

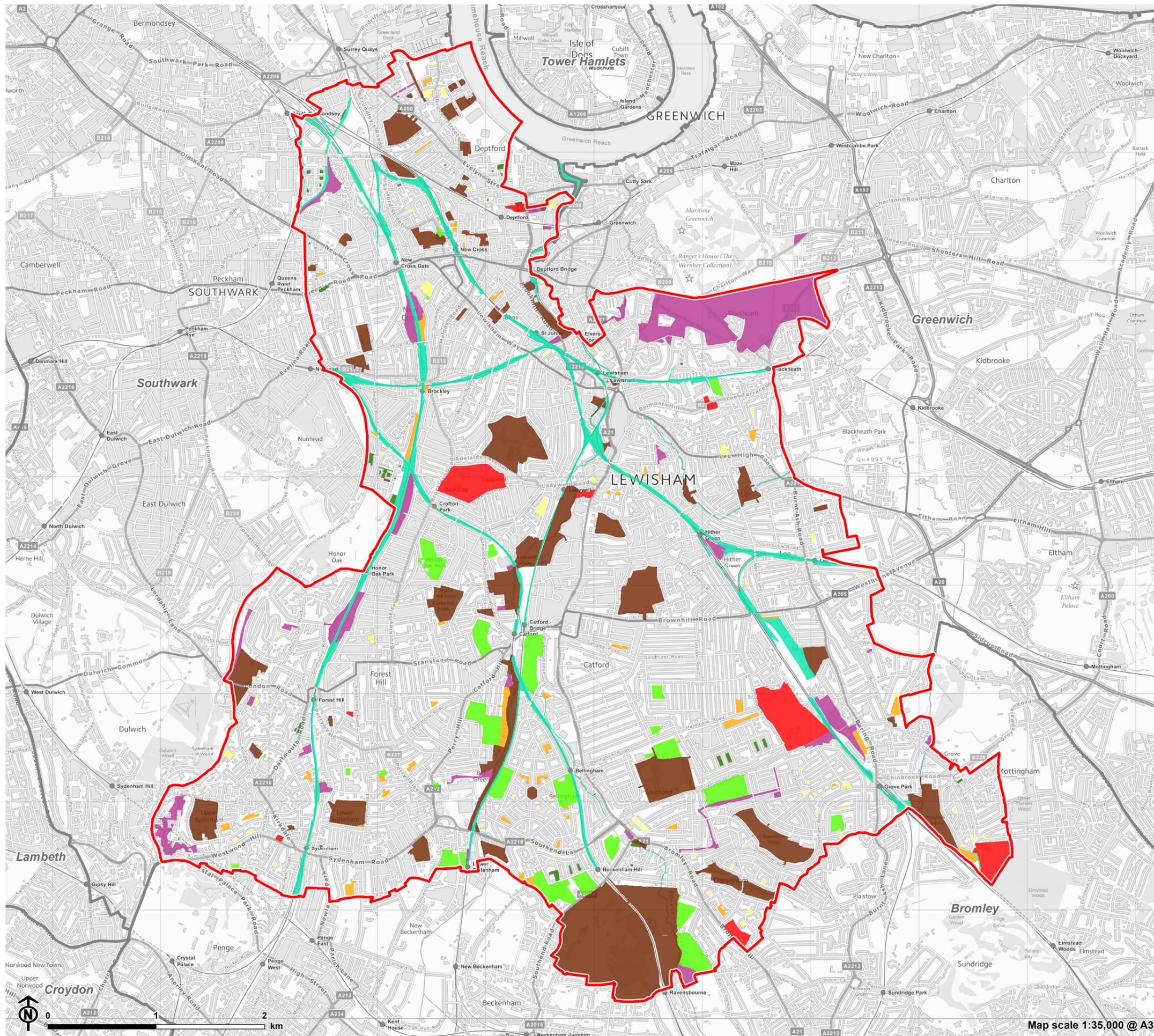
4.29 The open spaces by typology are shown in **Figure 1**.

Table 4.3: Revised number of open space by typology

Typology	Number of open spaces (2020)	Number of open spaces (2022)
Allotments and Community Gardens	46	50

Typology	Number of open spaces (2020)	Number of open spaces (2022)
Formal Amenity Greenspace	n/a	70
Informal Amenity Greenspace	n/a	40
Cemeteries and Churchyards	11	10
Provision for Children and Young People	45	42
Green Corridors	62	66
Natural and Semi-natural Urban Greenspace	26	38
Outdoor Sports Facilities	24	30
Parks and Gardens	50	59
Total	354	405

Figure 1: Open space by typology



- Lewisham borough
- Neighbouring borough
- Typology**
- Allotments and Community Gardens
- Cemeteries, Churches and Disused Churchyards
- Formal Amenity Greenspace
- Green Corridor
- Natural and Semi-natural Greenspace
- Outdoor Sports Facility
- Parks and Gardens
- Provision for Children and Young People

Chapter 5

Open space designations within a hierarchy

5.1 The following section sets out the recommended open space designations for Lewisham. The establishment of the open space designations has been informed through the review of relevant planning policy and best practice guidance (Chapter 3). It has also been informed through an understanding of the importance of open space provision for the borough's communities. Consideration has therefore been given to the role of open space provision to support health and well-being along with its contribution to the local nature recovery network. This is in addition to its role enabling communities to adapt to the impacts of climate change (e.g. contributing to air cooling, flood attenuation etc.). The importance of an open space to the borough has been considered as well as those which may be important at local level.

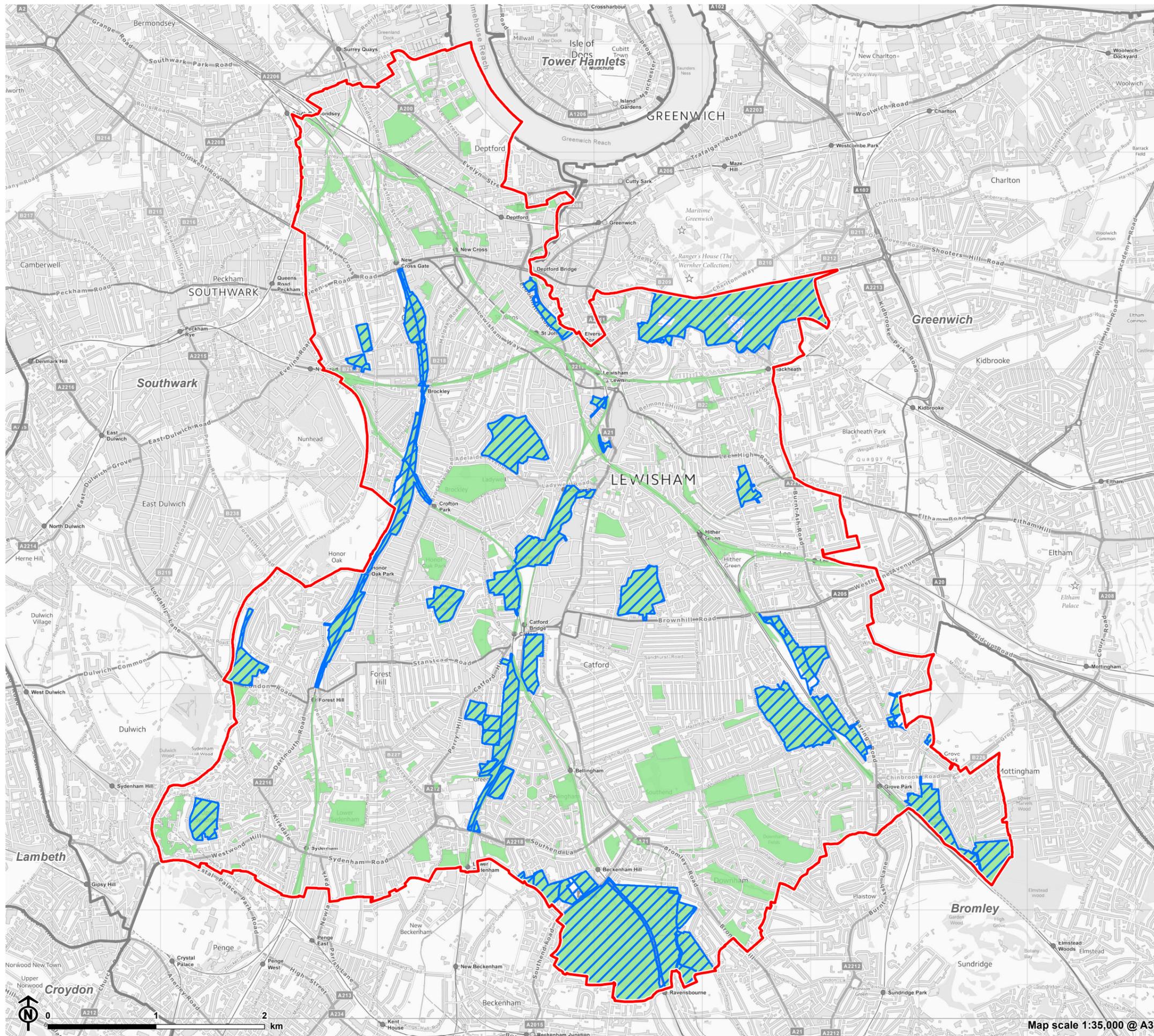
5.2 **Figure 2** identifies the open spaces within each hierarchy of designation.

Establishing a hierarchy of designations

5.3 The recent Covid-19 pandemic revealed the importance of communities being able to access good quality open space or being able to experience features of nature conservation importance within a short distance of their home. It is also vital that flora and fauna are supported through a series of ecological stepping-stones to connect habitats across the borough. This will support migration and aid nature recovery.

5.4 Local, small and pocket spaces may also help to divert recreational pressure on sites which are of considerable nature conservation importance. The ability for Lewisham to meet and respond to the challenges of a changing

Figure 2: Open space by designation



-  Lewisham borough
-  Neighbouring borough
-  Strategic open space
-  Metropolitan open land

Map scale 1:35,000 @ A3

climate will be dependent on a robust network of green infrastructure within the borough. The borough's network of open spaces forms the framework for this.

5.5 Within densely populated London boroughs, such as Lewisham, providing open spaces of a size to fulfil Regional, Metropolitan, District or even Local hierarchy, as set out within the London Plan, will be limited. It is therefore more important to consider the overall functionality of open space rather than designating sites by size.

The hierarchies of open space designations

5.6 Criteria used to identify sites by designation include:

- Importance of open space as reflected in level of designation (e.g. National, Regional, Metropolitan or Local).
- Functionality of open space including its importance for social, health and environmental benefits for the borough, either as a standalone site or through forming part of a local network or the borough's Green Grid.
- Size of informal spaces (e.g. amenity green space) and potential for these sites to offer greater functionality to address current deficiencies or project need (e.g. population growth).

5.7 Level of access to an open space is a consideration when determining hierarchy of designation but consideration should also be given to the broader functionality of the site as demonstrated in the above.

5.8 It is recommended that three hierarchies of open space designations are adopted in Lewisham. The hierarchies seek to reflect the significance of open spaces to reflect the functionality provided and the importance for social, health and the environment. The hierarchies for open space designations are:

- Metropolitan Open Land and Local Green Space
- Strategic Open Space
- Neighbourhood Open Space

5.9 The hierarchy of open space designations seeks to acknowledge the role an open space fulfils in contributing to social, health and environment of London as a whole, the borough and/ or community.

Metropolitan Open Land and Local Green Space

5.10 Sites designated within the Metropolitan Open Land designation are strategically important and are of London-wide significance. Open spaces included within this designation contribute the capital's green character, providing recreation facilities for Londoners and often preserve landscape of cultural and/ or natural heritage importance.

5.11 The London Plan states the strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances. Open spaces captured by this designation include the boroughs existing designated MOL as well as those recommended for MOL designation identified in the Metropolitan Open Land Review (2020) and Metropolitan Open Land Review Additional Sites Report (2021) and meet at least one of the following criteria:

- It contributes to the physical structure of London by being clearly distinguishable from the built-up area;
- It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;
- It contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value; and

- It forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

5.12 The National Planning Policy Framework states that Local Green Spaces should have the same level of protection as Green Belt. These are sites which can be designated through local plans or neighbourhood plans and which meet the following criteria:

- In reasonably close proximity to the community it serves;
- Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- Local in character and is not an extensive tract of land.

Justification

5.13 The policy guidance of paragraphs 79-92 of the National Planning Policy Framework on Green Belt applies equally to Metropolitan Open Land. Policy G3 of the London Plan supports the protection of Metropolitan Open Land.

5.14 The National Planning Policy Framework provides a mechanism by which local authorities and neighbourhood planning groups can protect some open spaces under a 'local green space' designation (paragraphs 101 and 103) and sets out that these areas should be managed by policies which are consistent with those for Green Belt and sets out high level criteria for such designations.

Strategic Open Space

5.15 These are sites are above 0.05 hectares in size and are significant to the borough's open space and wider green infrastructure network. They should be

identified on the planning policies map. These are open spaces which possess one or more of the following criteria:

- The open space contributes to the physical structure of the borough and/or neighbourhood and is clearly distinguishable as an open space
- It supports opportunities for formal and/or informal recreation and activities, which serve either significant parts of the borough or the neighbourhoods it serves.
- It contains features or landscapes (historic, recreational, biodiversity) of either borough or neighbourhood value
- It forms part of the borough's network of green infrastructure and meets one of the above criteria.

5.16 These include open spaces in the following typologies:

- Parks and Gardens
- Natural and Semi-natural Urban Greenspaces (e.g. international, national, regional/ metropolitan, borough or local designations (SINC))
- Green Corridors (including railway corridors and rivers)
- Cemeteries and Churchyards
- Allotments and Community Gardens
- Outdoor Sports Facilities
- Formal Amenity Green Space

Justification

5.17 National, regional and local planning policies support the protection and enhancement of individual open spaces which promote the social, health and environmental benefits of the borough and its communities. The London Plan notes open space as being vital to London's infrastructure and fundamental to the promotion of active travel routes and promoting vibrant neighbourhoods.

5.18 The Local Plan should include policies and designations to protect and enhance strategic open spaces as these are fundamental to the borough's green infrastructure network.

Neighbourhood Open Space

5.19 Neighbourhood open spaces that make an important contribution to the liveability of neighbourhoods but are unidentified on the planning policies map. The characteristics of these incidental open spaces make it challenging to comprehensively identify and map such provision. Neighbourhood open spaces include the following typologies:

- Provision for Children and Young People
- Civic and market squares and hard-surfaced areas designed for pedestrians
- Informal Amenity Green Space

Justification

5.20 Neighbourhood open spaces are incidental spaces providing doorstep provision for local communities. They may offer opportunities for health and wellbeing for communities through providing doorstep opportunities for informal or formal recreation including quiet contemplation. Furthermore, they may contribute to the character of an area and impart a sense of place for communities.

5.21 Whilst neighbourhood open spaces may not be mapped or shown on the policies map, it is recommended that the Local Plan includes policies to ensure such spaces are recognised and given an appropriate level of protection as part of a positive framework for delivering sustainable development. Consideration may be given to the loss of such open spaces where this will enable to delivery of wider public benefit and improvements to the overall quality and functionality of the remaining open space.

Conclusion

5.22 Planning policy at national, regional and local level highlights the importance of the open space network as a cornerstone of green infrastructure. Policy notes the social, health and environmental benefits such sites provide and seeks to protect individual open spaces as part of strategic networks.

5.23 Policy should therefore acknowledge the importance of all open space in the borough and consider the potential for each open space to contribute to the borough's Green Grid supporting urban greening, nature recovery, health and well-being, and sense of place.

5.24 It is recommended that the Local Plan includes a separate policy and designation to cover the protection of London Squares.

References

2020 London Urban Forest Plan

https://www.london.gov.uk/sites/default/files/londonurbanforestplan_final.pdf

All London Green Grid Supplementary Planning Guidance on Green Infrastructure and Open Environments

<https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/all-london-green-grid>

Environment Act

<https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

Lewisham Core Strategy

<https://lewisham.gov.uk/my services/planning/policy/adopted-local-plan/core-strategy>

Lewisham Local Plan review

<https://lewisham.gov.uk/my services/planning/policy/planning>

Lewisham Open Space Strategy 2020 - 2025

<https://lewisham.gov.uk/documents?query=parks%20and%20open%20space%20strategy&sort=score>

London Environment Strategy

Lewisham Open Space Review

<https://www.london.gov.uk/what-we-do/environment/london-environment-strategy>

London Infrastructure 2050 Update

<https://www.london.gov.uk/what-we-do/business-and-economy/better-infrastructure/london-infrastructure-plan-2050>

London Urban Forest Plan

https://www.london.gov.uk/sites/default/files/londonurbanforestplan_final.pdf

National Planning Policy Framework

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

National Planning Practice Guidance

<https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

Natural Capital: Investing in Green Infrastructure for a Future London

<https://www.london.gov.uk/sites/default/files/gitaskforcereport.hyperlink.pdf>

Open Space Strategies Best Practice Guidance

<https://www.designcouncil.org.uk/sites/default/files/asset/document/open-space-strategies.pdf>

Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7660/156780.pdf

The London Plan 2021

https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

Appendix A

Selected review of open space policy adopted by surrounding authorities

Southwark Local Plan

Open Space Designations

“Metropolitan Open Land (MOL): Strategic open land within the urban area that contributes to the structure of London. It carries the same general presumption against development as Green Belt.

Land designated as Metropolitan Open Land should satisfy one or more of the following criteria:

- 1. Land that contributes to the physical structure of London by being clearly distinguishable from the built up area;*
- 2. Land that includes open air facilities, especially for leisure, recreation, sport, arts, cultural activities and tourism which serve the whole or significant parts of London;*
- 3. Land that contains features or landscapes of historic, recreational, nature conservation or habitat interest at a metropolitan or national level;*
- 4. Land that forms part of a green chain and meets one of the above criteria or based on the council’s discretion informed by an evidence base study.*

The following types of open space must be MOL:

1. *Metropolitan sites of nature conservation;*
2. *Sites that are on the register of parks and gardens of special historic interest in England;*
3. *Metropolitan parks;*
4. *District parks.*

Acceptable uses for MOL are:

1. *Public and private open spaces, playing fields and outdoor sport, including outdoor recreational facilities for which adequate provision cannot be made within the urban area;*
2. *Existing institutions standing in extensive grounds;*
3. *Woodlands and orchards;*
4. *Rivers, reservoirs, lakes, docks and other open water;*
5. *Allotments and nursery gardens;*
6. *Cemeteries and associated crematoria;*
7. *Nature conservation.*

Borough Open Land (BOL): Open space of local importance. BOL must meet all of the following criteria:

1. *An area of local importance to Southwark;*

2. A clearly distinguishable open space;

3. Land that contains features or landscapes of historic, recreational or nature conservation value at a borough level;

4. It must not be MOL.

The following types of open space must be BOL:

1. Borough sites of nature conservation;

2. Local parks and open spaces over 2 hectares that have public access;

3. Open spaces over 0.4 hectares that occur in areas of local open space deficiency;

4. Open spaces over 0.4 hectares that occur in areas of district open space deficiency;

5. Open spaces protected under the London Squares Preservation Act;

6. Local historic sites of interest.

Other Open Space (OOS): Open Spaces that are not MOL or BOL, but meet one or more of the following criteria:

1. Allotments;

2. Public open space including public parks and gardens;

3. Playing fields and sports grounds whether publicly or privately owned;

4. *Private open space which is of benefit to the local community;*
5. *Open space that has been created and secured through planning obligations;*
6. *Sites of ecological importance. Other open spaces not include open spaces that are ancillary to, and/or within the curtilage of a building.”*

Hackney Local Plan

“Designated open spaces include Metropolitan Open Land and Local Open Space as shown on the Policies map. Metropolitan Open Land will be protected from inappropriate development by applying the principles of national Green Belt policy set out in the NPPF, and in accordance with London Plan policy. Development on Local Open Space and playing fields is not permitted unless all criteria in section C of the policy are met. Loss of other open space, which tends to be located within housing estates, will also be carefully managed in line with criteria D of the policy as these spaces play a particularly important role for those without access to private gardens.”

LP46 Protection and Enhancement of Green Infrastructure

The policy includes:

- A. *“All new development should enhance the network of green infrastructure and water spaces across the Borough and seek to improve access to open space, particularly in areas of deficiency.*
- B. *The Council will protect and enhance Metropolitan Open Land in accordance with the London Plan and national Green Belt policy.*
- C. *Development involving the loss of Local Open Space or of playing fields will not be permitted unless:*

- a. *There is compensatory contiguous replacement of better or equivalent quantity and quality of playing fields of public open space and setting including facilities to enhance or diversify people's experience of open space; and*
- b. *Replacement is in a location with better or equivalent access by walking, cycling or public transport; and*
- c. *The quality of the remaining and replacement of open space is not eroded by the proposed development.*

Development on other open space will only be permitted where:

Replacement and/ or enhancement of open space of better or equivalent quality is provided either on site or a location within the vicinity of the site, especially in the identified areas of deficiency, and

ii. wherever possible any replacement connects to the network of green infrastructure including the green chains and green corridors, or

iii. it can be shown that the relationship between buildings and associated open space(s) can be improved in terms of use, security, setting and landscape quality.

E. Small scale ancillary developments which enhance the park and open space offer, such as refreshment facilities, public conveniences, drinking fountains, public art installations or outdoor play and fitness equipment will be permitted provided that they are:

i. Of a high standard of design and quality, safe and accessible to all; and

ii. Do not have a detrimental impact on nature conservation and biodiversity, and should seek to improve such; and

*iii. Do not result in the loss of functional open space where possible;
and*

*iv. Do not detract from the overall function, character and appearance
of the park or open space.”*

Lambeth Local Plan

“Metropolitan Open Land (MOL) is London’s strategically important open space within the built environment and is a unique designation to London. As outlined in the London Plan MOL is afforded the same level of protection as the Green Belt. Policy G3 (Metropolitan Open Land) of the London Plan will be applied to areas of open space designated as MOL in the borough. The list of areas in Lambeth protected by the MOL designation is set out in Annex 5. The areas of designated MOL, SINC and LNR in Lambeth are shown on the Policies Map.”

Richmond Local Plan

Policy LP 13 Green Belt, Metropolitan Open Land and Local Green Space

“Green Belt and Metropolitan Open Land:

- A. The borough’s Green Belt and Metropolitan Open Land will be protected and retained in predominately open use. Inappropriate development will be refused unless ‘very special circumstances’ can be demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land.*

Appropriate uses within Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water and open community uses including allotments and cemeteries. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt or Metropolitan Open Land.

- B. It will be recognised that there may be exceptional cases where inappropriate development, such as small scale structures for essential utility infrastructure, may be acceptable.*
- C. Improvement and enhancement of the openness and character of the Green Belt or Metropolitan Open Land and measures to reduce visual impacts will be encouraged where appropriate.*

When considering developments on sites outside Green Belt or Metropolitan Open Land, any possible visual impacts on the character and openness of the Green Belt or Metropolitan Open Land will be taken into account.

- D. Local Green Space, which has been demonstrated to be special to a local community and which holds a particular local significance, will be protected from inappropriate development that could cause harm to its qualities*

Other Open Land of Townscape Importance (OOLTI) Open areas, which are not extensive enough to be defined as Metropolitan Open Land, but act as pockets of greenery of local significance, contribute to the local character, and are valued by residents as open spaces in the built up area. These areas can include public and private sports grounds, some school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. OOLTI is a local policy and new designations are made by the Council as part of the plan-making process. This is different to 'Local Green Space' (see definition above), which national policy makes provision for.

OOLTI should be predominantly open or natural in character. The following criteria are taken into account when defining OOLTI (note that the criteria are qualitative and not all need to be met):

- Contribution to the local character and/or street scene, by virtue of its size, position and quality.*
- Value to local people for its presence and openness.*
- Immediate or longer views into and out of the site, including from surrounding properties.*
- 50 • Contribution to a network*

of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure'. Value for biodiversity and nature conservation and meets one of the above criteria.

Policy LP 14 Other Open Land of Townscape Importance Other open areas that are of townscape importance will be protected in open use, and enhanced where possible. It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria will be taken into account when assessing whether development is appropriate: a. it must be linked to the functional use of the Other Open Land of Townscape Importance; or b. it can only be a replacement of, or minor extension to, existing built facilities; and c. it does not harm the character or openness of the open land. Improvement and enhancement of the openness or character of other open land and measures to open up views into and out of designated other open land will be encouraged. When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account.

The purpose of this policy is to safeguard open land of local importance and ensure that it is not lost to other uses without good cause. Areas designated as Other Open Land of Townscape Importance (OOLTI) form an important part of the multi-functional network of Green Infrastructure and they can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. New areas for OOLTI designation can only be identified when a plan is being prepared or reviewed. The existing designated areas are shown on the Policies Map.”

Croydon Local Plan

Metropolitan Green Belt

“Metropolitan Green Belt is a national designation which aims to check the unrestricted sprawl of London, prevent Croydon from merging with towns in neighbouring local authorities, safeguard Croydon’s countryside from encroachment, to preserve the setting and special character of Croydon, and to assist in its regeneration by encouraging the recycling of derelict and urban land.

Between them the National Planning Policy Framework and London Plan apply the same level of protection to the Metropolitan Open Land as is afforded to Metropolitan Green Belt.

Metropolitan Green Belt Location: Across the Places of Addington, Addiscombe, Coulsdon, Kenley & Old Coulsdon, Purley, Sanderstead, Selsdon, Shirley and South Croydon.”

Camden Local Plan

Designations:

- Open space
- Metropolitan Open Land
- Site of Special Scientific Interest (SSSI)

“Camden has large areas of Metropolitan Open Land (MOL) which is important to the whole of London, as well as the Borough, and provides attractive, visual breaks to the built-up area, keeping land permanently open. This designation is broadly equivalent to the Green Belt, meaning development is only permitted in

very special circumstances. The Regent's Canal forms part of the Blue Ribbon Network of waterspaces and is of strategic significance to London. It contributes to open space provision by providing amenity, opportunities for recreation and support for biodiversity. The London Plan sets out in detail how development affecting the MOL and Blue Ribbon Network will be assessed.

The Borough has a variety of locally significant open spaces performing a range of functions. About two-thirds of all spaces are small parks, linear green space/ green corridors or amenity land used and highly valued by local residents. A significant number of open spaces are designated for their nature conservation importance and Policy A3 Biodiversity relates to the safeguarding of these sites. The Borough's open spaces, together with street trees, soft landscaping, roof gardens, green/brown roofs and walls and the Regent's Canal, form a network of 'green infrastructure' performing a range of functions and delivering a wealth of benefits for the local population and wildlife.

Many of the Borough's designated open spaces are located within Conservation Areas or designated as heritage assets in their own right. This includes 'London Squares' protected for their leisure and recreational value and non-designated heritage assets identified on the Council's 'Local List' or through neighbourhood plans. A number of spaces are Parks and Gardens of Special Historic Interest – significant designed landscapes registered by Historic England. Open spaces can positively contribute to a conservation area's character and the setting of heritage assets. We will have regard to conservation area appraisals and management plans, the National Heritage List for England, the Greater London Historic Environment Record (HER) and other appropriate sources when establishing the contribution made by open spaces to the historic environment

Camden's designated open spaces include areas of MOL. This is open space of London-wide significance that provides a break in the built up area and receives the same presumption against development as green belt land. There are four main areas of Metropolitan Open Land in Camden, which are of great importance to the borough and its character – Hampstead Heath and adjoining areas, Regent's Park, Primrose Hill/Barrow Hill Reservoir and Highgate Cemetery/Waterlow Park/Fairseat. We will protect the openness and character

of these spaces in accordance with London Plan policy 7.17 and policy guidance in the National Planning Policy Framework (NPPF) on Green Belts.”

Appendix B

List of Formal Amenity Green Space

Formal Amenity Greenspace

Rangefield Road Housing Green - East

Pitfold Gardens

Milborough Crescent

Lock Chase Green

Merchant Taylors' Almshouses

Alanthus Close Green

Ladywell House Gardens

Ladywell Green

Goldsmith College Green

Turnham Road Green

St Norbert Green

Grove Close Green Space

Duncombe Hill

Rocombe Crescent Triangle

Boyland Road Housing Green

Roseveare Road Green

Downham/The Green

Exford Road/Burnt Ash Hill Triangle

Arcus Road Housing Green (North)

Chingley Close Housing Green

Beachborough Gardens

Oldstead Road Green

Sandpit Road Housing Green

Beaulieu Avenue Green

Laban

Pepys Estate Green (West)

Beaulieu Avenue Gardens

Playgreen Green Way Housing Green (East)

Oakridge Road Housing Green

Launcelot Road Housing Green

Lammas Green

Hall Drive Housing Green

Somerset Gardens

Saint Georges Square

Marvels Lane Housing Green

Merlin Gardens

Clyde Street Green

Knapmill Road Housing Green (North West)

Knapmill Road Housing Green (North West)

Knapmill Way Housing Green

Playgreen Way Housing Green (West)

Playgreen Way Housing Green (Centre East)

Playgreen Way Housing Green (Centre West)

Overdown Road Housing Green

Farmstead Road Housing Green

Moremead Road Housing Green

Arcus Road Housing Green (South)

Rangfield Road Housing Green

Gareth Grove Housing Green

Northover Road Amenity Green (South)

Dagonet Gardens Housing Green

Mayneswood Road Housing Green (South)

Castleton Road - Marvels Lane Green

Bramdean Crescent Housing Green

Southend Lane Housing Green

Roudtable Road Housing Green (North)

Roundtable Road Housing Green (South)

Reigate Road Housing Green

Hedge Walk

Rear of 34 Exford Road

Deals Gateway Pocket Park

Rossett Way

Pepys Estate Green (East)

Hocket Close

Bawtree Road

Nyhead Street

Elliot Bank Hedge

St. Barnabas

Norther Road Amenity Green (North)

St John the Baptist Church

Report produced by LUC

Report produced by LUC

Bristol

12th Floor, Beacon Tower, Colston Street, Bristol BS1 4XE
0117 929 1997
bristol@landuse.co.uk

Edinburgh

Atholl Exchange, 6 Canning Street, Edinburgh EH3 8EG
0131 202 1616
edinburgh@landuse.co.uk

Glasgow

37 Otago Street, Glasgow G12 8JJ
0141 334 9595
glasgow@landuse.co.uk

London

250 Waterloo Road, London SE1 8RD
020 7383 5784
london@landuse.co.uk

Manchester

6th Floor, 55 King Street, Manchester M2 4LQ
0161 537 5960
manchester@landuse.co.uk

landuse.co.uk

Landscape Design / Strategic Planning & Assessment
Development Planning / Urban Design & Masterplanning
Environmental Impact Assessment / Landscape Planning & Assessment
Landscape Management / Ecology / Historic Environment / GIS & Visualisation