

Response to the GLA regarding the need for an Open Space Strategy

The Royal Borough is of the view that they have addressed the long term aims that Planning Policy Guidance 17 (PPG 17) aims to deliver, given the context of a small inner London authority where land values are the highest in the country and available open space is at a premium. In the areas where there is little existing open space the opportunities to provide further open space are extremely limited and what open space can be provided will be small in scale. On this basis the general thrust for the Borough is to improve those public open spaces that already exist to make them more attractive and through the better provision of facilities. We consider that the work that has been undertaken addresses these needs and is commensurate with the opportunities that are available for the provision of new open space and the improvement of that which exists.

Nonetheless, the Companion Guide to PPG17 recommends (and the London Plan requires) that all open spaces, irrespective of ownership and public access, should be included in an assessment, as a basis for setting comprehensive local standards for quantity, quality and accessibility. The strategy should act as a vision for all open spaces. To this end a joint document entitled Open Space Strategies Best practice guidance was adopted by CABI and the Mayor of London in March 2009. This document sets out 6 stages to preparing an open space strategy and to explain why we consider that we have covered the essential methodology for an Open Space Strategy each stage outlined in the CABI document will be addressed and we will demonstrate why our evidence base is robust in policy terms.

PPG17 suggests a logical methodology based on identifying needs, setting standards, identifying deficiencies and developing a strategy and related policies. The adopted London Plan (February 2004) sets out the strategic context for open space planning which is based on protecting and promoting the network of open spaces throughout London. Policy 3D.11 of the London Plan states that London Boroughs should prepare Open Space Strategies to understand the supply and demand of open spaces and identify ways of protecting, creating and enhancing them and improving the quality through better management.

Stage 1 Preparing the scoping study and the brief

Secure Elected Member support

The first stage of preparing an Open Space Strategy is to secure elected member support. A fundamental component of the work undertaken to assess open space in the Borough is the Park's Strategy which has been adopted for the period 2006 -2015. As part of the compilation of this document a working party was set up. This had two Councillors as well as Officers from various Business groups including the Planning department. The Strategy was endorsed by the Cabinet Member for Regeneration, Waste and Leisure Services. The Park's Strategy covers all of the open spaces that are managed

by the Leisure services department, which is incidentally all public open space in the Borough with the exception of Kensington Gardens and the Royal Hospital grounds. The aim is to bring all parks and public open spaces within the Borough up to Green Flag status. The role of this document will be explained later in the paper.

Define the scope and purpose of the study

As part of conducting a comprehensive audit of all open space in the borough the definition of open space in the London Plan (February 2004) was used as a starting point. This is all land use in London which is predominantly undeveloped other than by buildings and structures that are ancillary to the open space use. The definition covers the broad range of open space types within the Royal Borough, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

We set clear parameters to the type and size of open space to be recorded as part of an Open Space audit and used the London Plan definition of what should be included. Private residential gardens were not included in the borough audit. However, amenity space around housing and commercial developments were included, but only where there was not an obvious boundary enclosure as part of the curtilage of a building which would indicate that the land in question was garden land, rather than open space that should be included as part of the audit.

Work undertaken previously

Previous information on open space in the borough was used, principally the October 1992 Open Space Survey which was based on a database compiled in 1986. Open spaces and publicly accessible indoor sports facilities were covered by the survey. Open space was defined as all open land with the exception of individual private gardens, yards, roads, car parks and vacant land. Access was categorised by public, private and limited. In terms of the assessment of open space deficiencies and provision, the NPFA minimum standard for Outdoor Recreational Playing Space (1989) was used which had a target standard of 2.43ha of outdoor recreational playing space per 1000 population. Using the London Public Open Space hierarchy a Public Open Space Deficiency map was developed.

Use of GIS

A GIS database has been developed which has used digitised site boundaries and each entry has been categorised with the ward, address, size (in sq m) and access classification. The site boundaries have been snapped to an Ordnance Survey mastermap.

Stage 2 Reviewing the context

As part of the audit process we reviewed the national, regional and local context which is stipulated in the audit paper. We have taken into account

other strategies including the Sustainable Community Strategy, Play Strategy Parks Strategy, the Biodiversity Strategy and the Play Pathfinder project.

Key characteristics of the open space have also been identified which have included any local or national designation such as Sites of Nature Conservation Interest, Areas of Metropolitan Open Land, Registered Historic Parks and Gardens and they have been included in the audit.

A profile of the borough's population has also been compiled from the 2001 census in so far as it may have relevance to open space provision and this has been divided up into ward. This can identify open space need so that it can be matched to strategic site growth points in the borough.

With regard to the financial implications of managing open spaces in the borough this information is appraised as part of the adopted Park's Strategy. The Park's Strategy covers effectively the majority of public open space in the borough and apart from Kensington Gardens, Royal Hospital and Westway there is very little land (if any) outside the Council's ownership which would be subject to different management and funding regimes.

Stage 3 Understand the supply

This stage involves key work for planning policies which is to produce a full analysis of existing open space which are collated in a database of sites with associated information. This work has been undertaken in the 2004/5 Open Space Audit with the identification of all open spaces, open space categorised by function and size, and on site audit of open space and the production of a dataset containing the key information.

We have identified all open spaces within the borough regardless of ownership and the extent of public access, except private gardens and we have recognised the value that small sites have in the borough by setting a threshold which would be appropriate to capture the smaller spaces- 0.1 Ha (1000sqm).

We have categorised open space by function and size and have identified what the principal function of the open space is, for example play space or sports facility. We have also used the PPG 17 typology which has been supplemented with further entries based on function such as details of outdoor sports facilities and whether these have spectator seating, changing rooms, toilets, all weather pitches, floodlighting. Under 5 facilities have also been recorded.

All open space in the borough has also been categorised by size using the London Plan hierarchy of open spaces which provides a consistent approach across London for identifying broad areas of deficiency in provision.

A survey of the nature and quality of each public open space has been undertaken as part of the Park's Strategy and using the Green Flag Award standard eight criteria are laid down for assessment. From this strategic

decisions can be made about how we should invest in our public open space in the borough. The RBKC Play strategy and Pathfinder project has also fed into this process by auditing the condition of all public play facilities within the Borough.

An external consultant was commissioned to undertake an Equalities Impact Assessment of the Leisure Services department in 2005. The final report recommended that, to begin with, the Leisure and Park's division needed to put a strategy in place covering its various services. The Parks Strategy has made a significant contribution to meeting this and also providing the qualitative input into assessing public open space in the Borough. In assembling the strategy consultation took place at different stages with a range of representative community groups.

A Park Strategy working party was set up which included Officers of the Planning department and seven key objectives were developed which are to:

- Ensure high standards of maintenance, management and safety in the parks,
- Recognise and develop the parks as a community resource and balance the needs of all sections of the community,
- Provide space for nature,
- Provide space for leisure and relaxation,
- Ensure good design quality and observance of our cultural heritage,
- Develop parks as a source of good health and feeling of well-being,
- Integrate the parks as part of the local economy.

As far as the Borough is concerned these are the priorities for investing in public open space in the borough.

Understand demand and need

In terms of understanding demand and need this has been undertaken pursuing two main strands. Deficiency has been identified by using the London Open Space hierarchy and a public open space accessibility map has been developed which shows the areas which are beyond a 400m walk of the nearest public open space. In other words those areas of the Borough which are beyond the catchment area for Local Parks (0.4km). The accessibility for Metropolitan Parks and District Parks has also been mapped, but given their catchment areas there is no deficiency in the Borough. To undertake this work the assessment of public open space was extended beyond the Borough boundary to examine the catchment areas for Metropolitan and District parks. The map is shown at page 190 of the Proposed Submission Core Strategy.

Public open spaces in the Borough have been categorised using the London Plan Open Space hierarchy so that there is a consistency of approach across London in identifying broad areas of deficiency of provision. In order to reflect local variations, such as those in an inner city borough such as Kensington and Chelsea, an additional category of small local, or pocket parks has been used.

The number of open spaces is also recorded together with their classification in terms of the London Open Space hierarchy.

The following have been developed as part of the Open Space audit:

- an open space area table has been developed by ward;
- a table of garden squares and private places for each ward which have been ranked in terms of number;
- a table of open space ownership in terms of public, private, institute or crown;
- the facilities on each open space in the ward have been recorded;
- facilities at pocket level by ward have been recorded;
- no. of play areas in each ward at pocket level have been recorded together with their accessibility in terms of public or private access
- Sports facilities on open space in each ward has also been recorded

Need

In terms of a desk top exercise demographic information has been examined using the 2001 census for identifying possible open space needs in the Borough. A ward profile for open space has been developed for each of the wards in the borough which outlines what facilities are available in terms of playground space, sports facilities and whether these are public or private. This identifies which wards have the least open space and facilities available including children's play facilities.

Public open space deficiency at local park level has been analysed against population distribution and age structure including limiting long term illness; population density and public open space, the number of children in the ward under 5, the number of children under 18, senior citizens aged 65 and over and the indices of multiple deprivation. Some broad conclusions regarding need and public open space have been drawn from this work. This forms part of the evidence base which will be useful in deciding what broad priorities should be taken into account when deciding the priorities for new open space in the Borough in terms of its use.

In terms of surveys for demand and need it is recognised that there are two strands to this. The first which is principally a planning issue, is addressed by Policy CR5 which requires that all major development outside a radius of 400m of the nearest public open space (ie the catchment at local park level) to make provision for new open space which is suitable for a range of outdoor activities and users of all ages including the provision of external playspace. This may be in the form of communal garden space. Where this is not possible for townscape reasons then a contribution towards improving the nearest publicly accessible open space will be required, the details of which are outlined in the Planning Obligations SPD.

The second objective is linked to the contributions towards improving public open space and this is a rolling programme which begins with the eight

largest parks in the borough that offer the most scope for improvement. Notwithstanding this, it is the Council's intention to maintain all of its other parks and open spaces in excellent condition as well. Need in terms of how the public open spaces can be improved has been assessed as part of the Park's strategy. Objective 2 of the Strategy is to recognise and develop the parks as a community resource and balance the needs of all sections of the community. To this end need has been assessed with feedback from "friends of parks" groups, user surveys and asking the local population who live in the vicinity of the park about how it can be improved. Survey work carried out as part of the Park's Strategy emphasised the need to balance the provision of play facilities for young children with other facilities for older children and teenagers. The results of the Play pathfinder project also feed into this process.

The cultural importance of the park as a meeting place, particularly for immigrant families and communities has also been recognised and has been facilitated where possible. Accessibility within the Parks has also been assessed as part of the guidance contained within the Disability Discrimination Act 1995 and the RBKC Play area safety inspection report.

On the basis of the above it is considered that both the need and demand for open space in the borough have been assessed. The Borough can obviously only improve public open space within its control and therefore the emphasis on need and demand deals with the open spaces that are managed by the Leisure Services department. It is the intention that all the 32 public open spaces that are owned by the Council will eventually achieve Green Flag status.

Stage 5: Analyse and identify objectives

We recognise that the aim of an open space strategy is to ensure that there is a range of accessible, high-quality and inclusive open spaces available to everyone and to identify where new open space is needed and the type of such provision. The key issue will be to improve quality and accessibility to open space and have mechanisms in place to redress deficiencies in provision.

Unlike, most other London Boroughs we do not have any spare capacity for open space to be released to other uses. Open space that has existing or potential value, is protected from inappropriate development by Policy LR8 of the adopted Unitary Development Plan which states that: *"To resist the loss of existing open space which meets leisure and recreation needs."*

This policy has been strengthened in the Publication Core Strategy to read:

"The Council will protect, enhance and make the most of existing parks, gardens and open spaces, and require new high quality spaces to be provided."

To deliver this, the Council will (amongst other criteria) resist the loss of Metropolitan Open Land, public open space and private communal space and private open space where the space gives visual amenity to the public.”

We are simply not in a position and nor would it be appropriate to release open space for other uses which meets the criteria listed above. In those very limited circumstances where open space needs to be re-configured, such as estate re-development we would expect open space to be provided of an equivalent better size and quality.

Setting standards for quantity, quality and accessibility

Quantity

The quantity of open space has been calculated for the total borough population and expressed as the area per thousand population, but also for the population of each ward area and this is shown within the Open Space audit which forms part of the evidence base for the Proposed Submission Core Strategy. This allows for comparisons with other similar local authority areas, but also allows easy identification as to which wards need to be targeted for further open space provision and where this is not possible, that the quality of existing open space is improved. This work forms part of the appendices to the Open Space audit.

In terms of providing a quantity standard the Council has never used the National Playing Fields Association standard of 2.43 hectares (6 acres) of outdoor playing/recreational space per 1000 population because it is a totally unrealistic target for an inner city London borough – there is simply no space to develop further sports pitches and the standard can never be met. Instead the Council has aimed to improve the quality of its existing publicly owned spaces. However, using the London Plan hierarchy of open spaces, those areas which are beyond a 400m walking distance of the nearest public open space have been identified and these are targeted as areas where there is a deficiency at local park level.

In terms of providing for children and young people’s play and information recreation this is part of setting quality standards for open space.

Quality

In terms of assessing the quality of the Council’s public open spaces the overarching document is the Ten –Year Parks Strategy which covers the period 2006/2015. Whilst the strategy covers all the open spaces that are managed by the Leisure Services department, emphasis has been given to the eight largest parks in the borough which offer the most scope for improvement. However, the Royal Borough has 32 public parks and open spaces of which eight are categorised as ‘major parks’ due to the combination of size and range of facilities. With the exception of Kensington Gardens and Royal Hospital these cover virtually all the public open spaces in the Royal Borough. As a measure of excellence the Council wants each of the eight

major parks to gain and keep Green Flag awards. A formal management plan is required for each and these are in the process of being drawn up. Holland Park already has Green Flag status and since 2006 one of the other seven Parks has been brought up to Green Flag level, the last two being St. Luke's Gardens and Kensington Memorial Park. By 2010 we hope to have Gunnersbury Cemetery, Little Wormwood Scrubs and Cremorne Gardens achieving the award.

The Green Flag award criteria has also been adapted to provide the basis for a quality standard for all the borough's public open spaces and as a result smaller open spaces are now being put forward for Green Flag status, the first likely to be St Mary Abbots Gardens. It is the intention that all public open spaces in the Borough will eventually have Green Flag status.

The Council has a desire to involve park users in the running of the parks to both reflect local aspirations and to encourage a feeling of 'ownership'. Consequently in depth discussions have been and will be undertaken for each of the parks and this has involved local ward Councillors, residents and community groups. Account is also taken of facilities elsewhere in the locality and this is where the audit of Open Space and the work undertaken by the Planning Department feeds in. Similarly comments about other nearby open spaces are noted and considered.

The Council aims to provide a wide range of facilities in its parks and open spaces which take into account catchment areas, local feedback and the availability of like facilities in other nearby locations. The work that has been undertaken at ward level for open space in the Borough and the needs of different sectors of the population also feeds into this process.

We realise that for successful parks management several factors have to be developed to their best possible advantage – horticultural, landscaping, buildings and infrastructure, public facilities (playgrounds, catering, lavatories, shelters); sports and exercise; staff numbers and training; security and supervision. Set against this is the need to understand and balance some of the very different and conflicting purposes, which bring people into the Parks. For example, a quiet area for those seeking solace and reflection may not sit easily with a play area for young children.

The Parks Strategy has drawn up 7 key objectives for areas of improvement:

- Ensure high standards of maintenance, management and safety in the parks;
- Recognise and develop the parks as a community resource and balance the needs of all sections of the community
- Provide space for nature
- Provide space for leisure and relaxation
- Ensure good design quality and observance of our cultural heritage;
- Develop the parks as a source of good health and feeling of well-being;
- Integrate the parks as a part of the local economy

With regard to conflicting demands made upon public open space from different age groups, user groups, neighbours and other visitors. Whilst taking the open space audit into account and needs within the borough it will also be based on community consultation through resident surveys and MORI surveys. From 2010 customer satisfaction surveys will be carried out for the parks and open spaces in the Borough and repeated every three years.

Play space Quality

The extent of Borough's shortfall in play-space provision is illustrated using the National Playing Fields Association standards which suggest a standard ratio of children's recreational space to be in the range of 0.6 - 0.8 ha per 1000 population. In 1992 the ratio was 0.4ha/1000.

Notwithstanding the above standard, an audit of Children's Play Space has been undertaken by the Family and Children's Business Group in conjunction with Sheffield Hallam University with assistance from the Planning department, to develop best practice guidelines on auditing play provision, assessing requirements and implementing standards. This is known as the Play Pathfinder project.

The Royal Borough was invited to bid to become one of 20 Play Pathfinders across England in February 2008 by the Department of Children, Schools and Families, out of a potential 65. The application was endorsed by the Family and Children Service's Executive Director and welcomed by RBKC's Overview and Scrutiny Committee, as it was in line with the Play Strategy and the Parks Strategy. In April 2008, RBKC was informed it was successful and would receive £2.153 million capital and £498,011 revenue funding to improve and increase the high-quality outdoor adventure play opportunities available for local children, particularly disadvantaged or hard-to-reach.

The ultimate aim of the RBKC Play Pathfinder Project is to enhance adventure and open access play in the Royal Borough, working across the Council, statutory agencies, and the wider third sector; with the attendant changes to business processes, staff organisation and procedures.

All public play facilities in the Borough (including those on Housing Association land) have been assessed in terms of quality and provision and the findings will be used to decide on funding priorities for the provision of additional facilities and more importantly, improving those which exist. Kensington and Chelsea were one of the six local authorities in the country who took part in the pilot project and are leading the field in terms of best practice. Section 106 monies collected through improving existing public open space can go towards improving play facilities which exist.

Biodiversity

In terms of assessing the ecological role of open space in the Borough, London Conservation Services were commissioned in 2002 to undertake a survey of all open spaces and habitats in the Borough. The purpose of the

study was to ensure that existing sites of nature conservation importance (SNCI) designations remain consistent with the GLA criteria for habitat designations; to identify new designations and to analyse the changes which have occurred since the previous survey. The was updated in June 2009 with the publication of the 'Revision of Sites of Nature Conservation Importance' which analysed all existing Sites of Nature Conservation in the Borough and came up with a set of strategic recommendations to protect and enhance sites of nature conservation interest. These have been incorporated in the Proposed Submission Core Strategy.

Accessibility

We have undertaken an audit of all open space in the Borough and from this have used the Mayor's Open Space hierarchy to develop a public open space deficiency map which is based on walking distances from local parks (400m). This will be key mechanism in deciding whether the provision of further open space is appropriate (subject to townscape constraints) and whether developer contributions will be triggered for the provision of new public open space.

Delivery

The Planning Obligations Draft SPD sets out that additional population from new developments will create additional demand for open space and increased use of existing parks and open space. This is particularly true in terms of children and young people's play. Therefore planning obligations are sought to improve local parks and public open space, and children and young people's play facilities to spend in accordance with the Park's Strategy and the Play pathfinder project.

For park and open space provision each additional new build or change of use creating an additional residential unit will trigger a park and open space contribution based on the projected new residential population.

For children's and young people's play, all major residential developments are required to make a contribution to play facilities.

Use of formula

Planned park and open space investment requirement (over time) divided by growth in population arising from new predicted residential units (over time) to provide a general figure per new head of population to be multiplied by the predicted population yield from individual developments.

This produces a standard charge of £482 per new head of population.

On this basis individual dwelling contribution is as follows:

1 bed (1.4 persons) £675
2 bed (2 persons) £964

3 bed (2.8 persons) £1350
4 bed (3.5 persons) £1687

Children's and Young People's Play space

For qualifying schemes more than 400 metres (5 minutes walk) from existing provision, new provision on site will be sought or new off site provision based on child yield from the development, multiplied by basic open space and play provision per child, multiplied by cost per sq m of provision.

In areas of major regeneration, additional parks and open space contributions may be sought for specific schemes from all major developments instead of a formula based approach.

The calculation of child yield is the same as the education formula. Developments generating more than 10 children will be expected to provide on site as part of the development. Where in exceptional cases, where this is not possible, an off site contribution will be sought. This will be based on the standard of 10sq m per child,

The formula as follows:

- Child Yield calculated
- No. of children generated x 10sq m of play space = play space requirement.
- Average cost per sq m (£95) x play space requirement = financial contribution

Stage 6: Prepare the Strategy and action plan

The Council considers that it has produced the key stages of an open space Strategy, notably the audit of all open space in the Borough undertaken by the Planning department, and the Park's Strategy produced by the Leisure Services department which deals with the improvement of public open space. All public open space in the Borough has been set qualitative standards and there are mechanisms in place to ensure that there is thorough consultation for residents and other interested parties before deciding the priorities for each space. There is an evidence base that has looked at need in the Borough and this can be used to decide on future priorities for new open space and improvements to existing.

An open space audit has been undertaken of all open space in the borough and facilities have also been audited. This has identified where there may be deficiency at local park level (based on a 400m walk) and the map is within the Publication Core Strategy. The play pathfinder project has audited all public children's play facilities in the Borough, including those on Housing Association estates and a programme for improvements has been compiled. On this basis it can be concluded that the provision and improvement of open space in the Borough has been dealt with on a comprehensive basis and we

consider that our policies are based on sound evidence and are in general conformity with the London Plan.