



West Ham Park Committee

Date: WEDNESDAY, 2 DECEMBER 2020
Time: 12.15 pm, or on the rising of the Open Spaces and City Gardens Committee, whichever is later.
Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

Members: Oliver Sells QC (Chairman)
Caroline Haines (Deputy Chairman)
Graeme Doshi-Smith
Catherine Bickmore (External Member)
Karina Dostalova
Robert Cazenove (External Member)
Alderman Ian Luder
Wendy Mead
Barbara Newman
Justin Meath-Baker (External Member)
Richard Gurney (External Member)
Cllr James Asser (External Member)
Cllr Tahmina Rahman (External Member)
Deputy John Tomlinson
Rev. Simon Nicholls (External Member)

Enquiries: Richard Holt
Richard.Holt@cityoflondon.gov.uk

Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:

https://www.youtube.com/watch?v=byWR2uUSF_E

This meeting will be a virtual meeting and therefore will not take place in a physical location following regulations made under Section 78 of the Coronavirus Act 2020. A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

John Barradell
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**

2. **DECLARATIONS OF INTEREST UNDER THE CODE OF CONDUCT**

3. **MINUTES**

To agree the public minutes and non-public summary of the previous meeting of the West Ham Park Committee held on the 13th of October 2020.

For Decision
(Pages 1 - 4)

4. **WEST HAM PARK PLAYGROUND REFURBISHMENT**

Report of the Director of Open Spaces.

For Decision
(Pages 5 - 16)

5. **DRAFT OPEN SPACES DEPARTMENT BUSINESS PLAN FOR 2021/22**

Report of the Director of Open Spaces.

For Information
(Pages 17 - 26)

6. **DEPARTMENTAL BUSINESS PLAN 2020/21 - SIX MONTH PERFORMANCE**

UPDATE: APRIL TO SEPT 2020

Report of the Director of Open Spaces.

For Information
(Pages 27 - 36)

7. **PARK MANAGER'S UPDATE**

Report of the Director of Open Spaces.

For Information
(Pages 37 - 40)

8. **CWP 21/22 UPDATED BID REPORT**

Report of the City Surveyor.

For Information
(Pages 41 - 48)

9. **PLANNING WHITE PAPER**

Report of the Remembrancer.

For Information
(Pages 49 - 74)

10. **SUMMARY OF KEY OPEN SPACES MEDIA COVERAGE: OCTOBER TO NOVEMBER 2020**

Report of the Town Clerk.

For Information
(Pages 75 - 78)

11. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

12. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT.**

13. **EXCLUSION OF THE PUBLIC**

RESOLVED: That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

For Decision

Non-public Agenda

14. **NON-PUBLIC MINUTES**

To agree the non-public public minutes of the previous meeting of the West Ham Park Committee held on the 13th of October 2020.

For Decision
(Pages 79 - 80)

15. **NURSERY UPDATE**

Report of the Director of Open Spaces.

For Information
(Pages 81 - 108)

16. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

17. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

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WEST HAM PARK COMMITTEE Tuesday, 13 October 2020

Minutes of the meeting of the West Ham Park Committee held at
https://www.youtube.com/watch?v=foFiKQK4D_E on Tuesday, 13 October 2020 at
12.15 pm

Present

Members:

Oliver Sells QC (Chairman)
Caroline Haines (Deputy Chairman)
Catherine Bickmore
Karina Dostalova
Robert Cazenove
Graeme Doshi-Smith
Alderman Ian Luder
Barbara Newman
Deputy John Tomlinson
Karina Dostalova
Cllr James Asser
Justin Meath-Baker
Richard Gurney

Officers:

Richard Holt	- Town Clerk's Department
Polly Dunn	- Town Clerk's Department
Leanne Murphy	- Town Clerk's Department
Kristina Drake	- Media Officer, Town Clerk's Department
Colin Buttery	- Director of Open Spaces & Heritage
Gerry Kiefer	- Business Manager, Open Spaces Department
Mark Jarvis	- Head of Finance Citizen Services, Chamberlains
Ellen Wentworth	- Technology Support Officer, Chamberlain's Department
Lucy Stowell-Smith	- West Ham Park Manager, Open Spaces Department

1. APOLOGIES

Apologies for absence were received from Robert Cazenove.

2. DECLARATIONS OF INTEREST UNDER THE CODE OF CONDUCT

There were no declarations of interest received.

3. **ORDER OF THE COURT OF COMMON COUNCIL**

The Committee received the Order of the Court of Common Council dated 16 July 2020 for the West Ham Park Committee.

RESOLVED- That the Order of the Court of Common Council for the West Ham Park Committee be noted.

4. **ELECTION OF CHAIRMAN**

The Committee proceeded to elect a Chairman in accordance with Standing Order No. 29. The Town Clerk informed the Committee that Oliver Sells as the only Member expressing their willingness to serve was therefore duly elected Chairman for the ensuing year and took the Chair.

RESOLVED- That Oliver Sells be elected Chairman of the West Ham Park Committee for the ensuing year.

5. **ELECTION OF DEPUTY CHAIRMAN**

The Committee proceeded to elect a Deputy Chairman in accordance with Standing Order No. 30. The Town Clerk informed the Committee that Caroline Haines as the only Member expressing their willingness to serve was therefore duly elected Deputy Chairman for the ensuing year.

RESOLVED- That Caroline Haines be elected Deputy Chairman of the West Ham Park Committee for the ensuing year.

6. **MINUTES**

The Committee considered the public minutes of the West Ham Park Committee meeting held on the 16th of July 2020. A Member requested that a typographic error in item 4 of the draft minutes be corrected.

A member of the Committee extended their apologies for absence for the meeting on the 16th of July.

RESOLVED- That the public minutes of the West Ham Park Committee meeting held on the 16th of July 2020, subject to the corrections specified, be approved as an accurate record.

7. **PARK MANAGER'S UPDATE**

The Committee received a report of the Director of Open Spaces which provided an update to the Members of the West Ham Park Committee on the management and operational activities at West Ham Park since February 2020. The Director of Open Spaces introduced the report and highlighted to the Committee the retention of the London in Bloom Competition gold award.

It was noted that further discussion of the Nursery Site project would need to take place in the non-public session due to its relation to financial matters.

The Committee discussed the factors causing an increased loss of trees at West Ham Park. The Director of Open Spaces replied by confirming that

appropriate tree species and tree strategy would be investigated to minimise loss of tree numbers.

RESOLVED- That the report be noted.

8. **WEST HAM PARK PLAYGROUND PROJECT - UPDATE**

The Committee received a report of the Director of Open Spaces which provided an update on the West Ham Park Playground Project.

The Committee debated the extension of the Playground's fencing to increase its size. The Director of Open Spaces commented that there was a number of factors to consider in relation to extending the fence boundary, primarily the funding requirements. A Committee member commented that they were reluctant to approve a project option which had not been fully costed. The Director of Open Spaces confirmed that the City of London Corporation funding remained in place however the impact of COVID had caused external funding opportunities to be significantly reduced. In addition, it was confirmed that the extending of the Playground fencing would be explored appropriately. The Chairman indicated that the approved funding should be used to process the project without delaying to reconsider the project scope. A member of the Committee stated that that opportunity to extend the Playground area should continue to be considered.

RESOLVED- That the report be noted.

9. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no questions received in the public session.

10. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT.**

There was no further business considered in the public session.

11. **EXCLUSION OF THE PUBLIC**

RESOLVED – That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act.

Item No.

Paragraph

12

3

12. **MINUTES**

The Committee considered the draft non-public minutes of the West Ham Park Committee meeting held on the 16th of July 2020.

RESOLVED- That the non-public minutes of the West Ham Park Committee meeting held on the 16th of July 2020 be approved as an accurate record.

13. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

The Committee considered one question in the non-public session.

14. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
No further business was considered in the non-public session.

The meeting ended at 1.26 pm

Chairman

Contact Officer: Richard Holt
Richard.Holt@cityoflondon.gov.uk

Committees: Corporate Projects Board <i>[for decision]</i> Projects Sub <i>[for decision]</i> West Ham Park Committee <i>[for decision]</i>	Dates: 11 th November 30 th November 2 nd December
Subject: West Ham Park Playground refurbishment Unique Project Identifier: 11953	Gateway 3/4 Regular Issue Report
Report of: Director of Open Spaces Report Author: Lucy Stowell-Smith, West Ham Park Manager	For Decision
PUBLIC	

1. Status update	<p>Project Description: The Playground at West Ham Park needs to be refurbished to ensure its equipment and ancillary buildings are fit for purpose and meet current safety and safeguarding standards</p> <p>RAG Status: Amber (Amber at last report)</p> <p>Risk Status: Medium (Medium at last report)</p> <p>Total Estimated Cost of Project (excluding risk): £864,775 + £155,000 costed risk</p> <p>Change in Total Estimated Cost of Project (excluding risk): Decrease of £350k</p> <p>Spend to Date: £35,790</p> <p>Source of funding: Central City's Cash funding – approval granted for this scheme as part of the 2020/21 annual capital bid process.</p> <p>Costed Risk Provision Utilised: £0</p> <p>Slippage: In total the project is 18 months behind expected schedule. The project was put on hold as part of the Fundamental Review of projects but was re-approved for funds in December 2019. Impacts of COVID on general day to day Officers work load in 2020 has resulted in delay in planning application being submitted and has had impacts on external fundraising via other organisations such as the London Marathon Charitable Trust (see later detail)</p>
2. Requested decisions	<p>Regular: Gateway 5 - Authority to Start Work (Light)</p> <p>Requested Decisions:</p>

	<div>1. Approve the revised budget of £864,775 and agree that Option 2 – refurbishing the playground within the existing footprint be implemented, to be funded from the resources previously identified for this scheme</div> <div>2. Agree the revised scope of the project</div> <div>3. Approve Costed Risk Provision of £155,000</div>																				
3. Budget	<div><div>Complete this section in consultation with your Head of Finance</div><div>Total cost of the project – £864,775 not including costed risk provision.</div></div> <table><tr><th>Item</th><th>Reason</th><th>Funds/ Source of Funding</th><th>Cost (£)</th></tr><tr><td>Funding requested to GW5</td><td></td><td>Central resources</td><td>£20,687.</td></tr><tr><td>Option 2 Playground refurbishment</td><td>Change in scope and scale of project due to failure to raise external funding</td><td>Central resources – as approved*</td><td>£689,000</td></tr><tr><td>Waterplay Option A</td><td>As per previous report</td><td>Central resources</td><td>£110,000</td></tr><tr><td>Total</td><td></td><td></td><td>£864,775</td></tr></table> <div><div>Costed Risk Provision requested for this Gateway: £155,000</div><div>(as detailed in the Risk Register – Appendix 2)</div><div>*‘In principle’ funding approval was granted for this scheme as part of the 2020/21 annual capital bids and the Resource Allocation Sub Committee has previously agreed the release of central City’s Cash resources for its delivery. Scope of the project has been reduced to fit within the available budget. No additional funding is being requested.</div></div>	Item	Reason	Funds/ Source of Funding	Cost (£)	Funding requested to GW5		Central resources	£20,687.	Option 2 Playground refurbishment	Change in scope and scale of project due to failure to raise external funding	Central resources – as approved*	£689,000	Waterplay Option A	As per previous report	Central resources	£110,000	Total			£864,775
Item	Reason	Funds/ Source of Funding	Cost (£)																		
Funding requested to GW5		Central resources	£20,687.																		
Option 2 Playground refurbishment	Change in scope and scale of project due to failure to raise external funding	Central resources – as approved*	£689,000																		
Waterplay Option A	As per previous report	Central resources	£110,000																		
Total			£864,775																		
4. Issue description	<div>- External funding: A financial shortfall exists due to inability to raise external funding therefore the scope of the project is being reduced. Due to COVID19 many of the expected sources of funding have closed or been re-directed e.g. London Marathon Charitable Trust had reduced income as the London Marathon did not take place, the round two funding application was turned down. HLF fund is closed</div>																				

	<p>and will not open until 2021. Application to Veolia was unsuccessful. Possible funding or sponsorship from Livery companies and/or other private investors would not be sufficient to raise £350k as grants are for less than £10k and very few open for applications.</p> <ul style="list-style-type: none"> - Increasing age of equipment and infrastructure – Paddling pool was closed in 2019 and 2020 due to tiled surface failing. One further piece of equipment has been removed and two others fenced off due to safety concerns. 2/3 of picnic benches have been removed due to wood rot. If the refurbishment project does not go ahead in 2021 it is likely that further pieces of equipment will be removed or the playground closed due to the increasing age of the equipment and infrastructure and the maintenance issues associated.
5. Options	<ol style="list-style-type: none"> 1. Apply for more external funding to deliver Option 3 and delay project: Project could be placed on hold and officers could apply for external funding and wait for other funds to re-open however this would delay the project which is already 2 years behind completion. Concerns over the increasing age and associated maintenance issues of the equipment and infrastructure would also increase – Not Recommended 2. Apply to RASC for more funding to deliver Option 3 – given resource implications of COVID19 and impacts of fundamental review to the City's budgets it is not felt that this is appropriate. Not Recommended 3. Change scope of project and deliver Option 2, but obtain planning approval for Option 3 so that this could be implemented as a 'phase 2' at a later date. Funding already approved by RASC would permit Option 2 of the playground refurbishment to be delivered – this would see the playground re-furbished but within the current footprint. The waterplay would be improved and basic refurbishment to the toilet block, however the conversion of the park office to a concession and improvement to the toilet layout would be delayed and the playground would remain the same size. Planning permission (lasting 3 years) has been applied for. If additional funds were secured in the future the remaining elements of the project could be completed as a 'phase two'. Recommended.

Appendices

Appendix 1	Project Coversheet
Appendix 2	Risk Register
Appendix 3	Design options

Contact

Report Author	Lucy Stowell-Smith
Email Address	Lucy.stowell-smith@cityoflondon.gov.uk
Telephone Number	07958490894

Project Coversheet

[1] Ownership

Unique Project Identifier: 11953 **Report Date:** November 2020
Core Project Name: West Ham Park Playground refurbishment
Programme Affiliation: West Ham Park Nursery Project (84800003)
Project Manager: Lucy Murphy
Next Gateway to be passed: Gateway 5

[2] Project Brief

Project Mission statement:

The Playground at West Ham Park needs to be refurbished to ensure its equipment and ancillary buildings are fit for purpose and meet current safety and safeguarding standards

Definition of need:

A number of pieces of equipment are over 15 years old and are regularly closed due to defects. Two pieces have been removed due to safety concerns. A aged children's lido is also present but does not represent a good use of space and is costly to maintain and operate.

Key measures of success:

- 1) Deliver a new playground at West Ham Park to provide play and water play provision, meeting the following:
 - Create a quieter play area (for children under 5) with sensory play equipment and a more challenging play zone for children 10+ years.
 - Adequate swing provision (minimum provision should match the quantity of swings currently provided) for all ages.
 - Picnic area with benches as well as adequate benches and bins around playground perimeter.
 - Introduce safety surfacing that is aesthetically pleasing, but low maintenance and accessible for all. Maintain the fence line but soften the boundary with planting and/or trees. Create a new entrance into the playground.
- 2) The facility should be safe but also provide the appropriate level of risk and challenge required in the development of a child, meeting local, national and regional policies as well as guidance for outdoor learning and play
- 3) The playground should be of high quality reflecting the City's commitment to quality services but also seek to minimise on-going maintenance costs.

[3] Highlights

Finance:

Total anticipated cost to deliver [£]: £864,775

Total potential project liability (cost) [£]: £864,775

Total anticipated on-going commitment post-delivery [£]: 0 – future on-gong costs anticipated to remain the same and covered through existing budgets.

Programme Affiliation [£]: NA

[A] Budget Approved to Date*	[B] New Financial Requests	[C] New Budget Total (Post approval)
£65,775	Amendment of project cost from £1,184,000 to £864,775 due to failure to raise £350k external funding	£65,775

[D] Previous Total Estimated Cost of Project	[E] New Total Estimated Cost of Project	[F] Variance in Total Estimated Cost of Project (since last report)
£1,184,000	£864,775	£350,000
[G] Spend to Date	[H] Anticipated future budget requests	
£35,790	£799,000	

Headline Financial changes:

Since 'Options Appraisal report' (G3/4) report:

▲ Scope of project has been reduced to fit within available funding, no additional external funding available.

Project Status:

Overall RAG rating: Amber

Previous RAG rating: Amber

[4] Member Decisions and Delegated Authority

Gateway 1&2 report approved by

- Corporate Projects Board (Aug 17),
- Project Sub Committee (Sept 17) and
- West Ham Park Management Committee (Oct 17).

Gateway 3/4 report approved by

- West Ham Park Committee (Feb 19)
- Projects Sub Committee (Feb 19)

[5] Narrative and change

Date and type of last report: Gateway 3-4 report

Key headline updates and change since last report.

External funding was applied for, but applications were unsuccessful. Due to COVID19 many existing funds are closed or have been deferred to other priorities. Raising the remainder of the funding is not possible within the agreed timescales, therefore approval is sought to reduce the scope of the project to fit within the agreed budget to date.

Headline Scope/Design changes, reasons why, impact of change:

Since 'Option Appraisal' (G3-4) report:

- Additional funding was bid for to meet £350k shortfall however requests were not successful. Applying for more funds will not fit within project timescales
- Project is 2 years behind original anticipated delivery. Paddling pool has been closed in 2019 and 2020 due to maintenance issues, 2/3 picnic benches have been removed due to wood rot and a quarter of old equipment has been removed due to safety concerns.
- Approval is sought to change size and scope of project from Option 3 (extend playground and improve ancillary buildings) to Option 2 (refurbish playground but within original footprint) which could be delivered within the funds already approved by RASC.

Timetable and Milestones:

Expected timeframe for the project delivery: 2021

Milestones:

- 1) October 2020: Apply to LB Newham for planning approval for playground and concession.
- 2) December 2020: Commence contractor, play equipment and water play procurement
- 3) March 2021: Gateway 5

Are we on track for this stage of the project against the plan/major milestones? Yes- to the above revised timetable and milestone– Project was delayed due to FR hold on projects, but was re-approved for funds in December 2019. Impacts of COVID on general day to day Officers workload in 2020 has resulted in delay in planning application being submitted and has had impacts on funding streams

Are we on track for completing the project against the expected timeframe for project delivery? No – Two years behind schedule. If funding is agreed it is expected that project can be delivered during spring/ summer of 2021 ready to be opened for summer-autumn 2021.

Risks and Issues

Top 3 risks:

<i>Risk description</i>	Safety/Health: Aged and old play equipment and lido leading to increased likelihood of equipment failure and closure of parts of the playground/lido.
<i>Risk description</i>	Financial: Increased tender price (materials and labour) including preliminaries affected by Brexit and/or Covid where supply chains are affected causing delays
<i>Risk description</i>	Financial: Increased tender price due to scope creep as a result of surveys or increased remediation is required to retained utilities/ structures post demolition/ excavation

See 'risk register template' for full explanation.

Top 3 issues realised

<i>Issue Description</i>	<i>Impact and action taken</i>	<i>Realised Cost</i>
Lido tiles failing	Lido closed	-

Has this project generated public or media impact and response which the City of London has needed to manage or is managing?

Positive response received from the general public. 400 people responded to consultation. Public consultation was featured in local press and on social media.

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City of London: Projects Procedure Corporate Risks Register

Project Name: West Ham Park Playground refurbishment

Unique project identifier: 11953

Total budget estimate: £864775

PM's Overall risk rating	Medium
Avg unmitigated risk score	6.2
Avg mitigated risk score	4.3
Red risks (open)	1
Amber risks (open)	7
Green risks (open)	6

Corporate Risk Matrix score table

	Minor impact	Serious impact	Major impact	Extreme impact
Likely	4	8	16	32
Possible	3	6	12	24
Unlikely	2	4	8	16
Rare	1	2	4	8

Costed risks identified (All)

£910,300.00	105%
£314,000.00	36%
£155,000.00	18%
£155,000.00	18%

% risk total against budget estimate

Costed risk carried (Live)

" "

Costed mitigated risk carried (Live)

" "

Costed Risk Provision requested

Value of the costed risk provision requested

- (1) Service Delivery/ Performance
- (2) Financial
- (3) Reputation
- (4) Legal/ Statutory
- (5) Safety/ Health
- (6) Objectives

Number of Open Risks	Avg Score	Costed impact	Red	Amber	Green
3	3.7	£22,000.00	0	1	2
8	6.6	£160,000.00	0	6	2
0	0.0	£0.00	0	0	0
1	3.0	£7,000.00	0	0	1
2	10.0	£125,000.00	1	0	1
0	0.0	£0.00	0	0	0

Issues (open)	1
All Issues	1

Open Issues

Extreme	Major	Serious	Minor
0	0	1	0
0	0	1	0

All Issues

Cost to resolve all issues (on completion)	£13,000.00
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Sketch design options as per GW3/4

Option 1

**Playground design- Option 1**

- Only faulty equipment and associated surfacing replaced.

Option 2: Recommended in Issues report

**Playground design- Option 2**

- Second preferred option at public consultation.
- Playground redesign within the existing footprint.
- Boundary fence as existing and refurbished as required.
- Toilet block not refurbished and office space not converted to ancillary kiosk.
- Bespoke items such as integrated seating and planter beds replaced with standard 'off the shelf' products.
- This design option can be re-scoped and value engineered to be delivered within the existing approved budget.

Option 3: Approved at GW3/4

**Playground design- Option 3**

- Approved by Committee at GW 3/4.
- Redesigned and enlarged playground.
- Refurbishment of toilet block and conversion of office space to ancillary kiosk.
- New path along north boundary for improved accessibility.

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Committee:	Date:
Open Spaces and City Gardens Committee – For Decision	2 December 2020
West Ham Park Committee – For information	2 nd December 2020
Subject: Draft Open Spaces Department Business Plan for 2021/22	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Outcomes: 1, 2, 3, 4, 5, 8, 10, 11, 12
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Colin Buttery, Director	
Report author: Gerry Kiefer, Directorate Business Manager	

Summary

This report presents for approval the high-level Business Plan for the Open Spaces Department for 2021/22. It also identifies next years key areas of work for the Directorate, City Gardens and West Ham Park teams, identifying what's changed in 2020 and any longer term plans being considered.

Recommendation

The **Open Spaces and City Gardens Committee** is recommended to:

- Approve, subject to the incorporation of any changes sought by this Committee, the high-level Departmental Business Plan for Open Spaces for 2021/22 attached as Appendix 1.

The **West Ham Park Committee** is recommended to:

- Note this report any changes recommended by the Open Spaces and City Gardens Committee affecting the final version of the high-level Open Spaces Departmental Business Plan attached as Appendix 1.

Main Report

Background

1. Business Plans for 2021/22 are being presented based on current departmental structures. These will be adjusted, alongside budgets, when any changes to these structures are implemented.

Current Position

2. Business Plans are aligned to Departments, so all financial information presented within the Business Plan reflects the Departmental budget rather than the Committee budget.

Proposal

3. The draft high-level summary Business Plan for the Open Spaces Department is presented at **Appendix 1**.
4. The high-level business plan identifies the 7 main areas of work over the next year for the whole Department. The Directorate, City Gardens and West Ham park have detailed their own key areas of work over the next year within Appendix 2. Mirroring the information on the Departmental business plan they have also included 'what's changed during the year and longer term plans being considered.

Corporate & Strategic Implications

5. Strategic implications – Strategic priorities and commitments are expressed in Appendix 1, sides 1 and 2.
6. Financial implications – The draft high-level summary Business Plan at Appendix 1 has been drawn up taking into consideration increasing employee costs as well as a 12% reduction in the departmental budget compared to 2020/21.
7. Risk implications – Key risks managed by the department are included in the draft high-level summary Business Plan. The COVID19 risks which are reported corporately but relate to this Department are also included in the Business Plan.
8. Resource implications – Any changes to resources will be identified and delivered through the move to the Target Operating Model and/or to meet budget savings. Requests for capital funding for projects will be made as part of the annual capital bidding process.
9. Equalities implications – Where we develop new policies, strategies, service provision and capital projects we will undertake 'tests of relevance' and where appropriate a full equalities analysis.
10. Climate Implications – Open Spaces already offset 40% CoL scope 1 and 2 co2 emissions. An annual capital bid has been made as part of the overall Climate Action Strategy funding request; to support the work to increase co2 sequestration through land management and innovative working, which will contribute to 100% reduction target of CoL scope 1 and 2 emissions by 2025.

11. If funding is awarded, this project will build on the initial works that have mapped the carbon sequestration benefits from City Corporation Open Spaces and accelerate this function through re-introduction of best land management practices. The second area is to create a commercially sustainable future use of the sustainably produced timber and other agricultural products.

12. Security implications – there are no security implications arising from this report

Conclusion

13. This report presents the Open Spaces Department draft high-level Business Plan for 2021/22 and key areas of work at a local level for the services that report to Open Spaces and City Gardens Committee and West Ham Park Committee.

Appendices

- Appendix 1 – Open Spaces Department Draft High-level Business Plan 2021/22
- Appendix 2 – Key areas of work for 2021/22 for City Gardens, West Ham Park and the Directorate & Learning team

Gerry Kiefer

Business Manager – Open Spaces Department

T: 020 7332 3517

E: Gerry.kiefer@cityoflondon.gov.uk:

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THE DEPARTMENT'S VISION IS:

We enrich people's lives by enhancing and providing access to ecologically diverse open spaces and outstanding heritage assets across London and beyond.

Our overarching objectives are:

- A. Open spaces and historic sites are thriving and accessible.
- B. Spaces enrich people's lives.
- C. Business practices are responsible and sustainable.

Our major workstreams this year will be...

1. Implement the required savings to deliver a balanced budget within the reduced core funding envelope through a combination of reducing expenditure, increasing income.
2. Implement actions arising from the new Target Operating Model and provide open and early communication to all employees.
3. Progress the landscaping of Finsbury Circus, the replacement playground at West Ham Park and all other RASC approved capital projects including the Climate Action Strategy.
4. Work with other CoL Depts to commence the entire overhaul of Tower Bridge's High Voltage system, hydraulic pipework replacement and implementation of permanent solutions following the extensive Working at Heights review.
5. Working with City Surveyors, progress future use of the nursery site at West Ham Park.
6. Assess impact of expanded ULEZ on existing fleet, procurement and supplier capacity and available financial resources.
7. Continue to cultivate the Burnham Beeches Gateway and biodiversity net gain project partnership with local landowners and make ready for grant/funding applications.

The Corporate Plan outcomes we have a direct impact on are...

- Outcome 2 - People enjoy good health and wellbeing**
- Outcome 3 - People have equal opportunities to enrich their lives and reach their full potential**
- Outcome 5 - Businesses are trusted and socially and environmentally responsible**
- Outcome 10 - We inspire enterprise, excellence, creativity and collaboration**
- Outcome 11 - We have clean air, land and water and a thriving and sustainable natural environment.**
- Outcome 12 - Our spaces are secure, resilient and well-maintained.**

What's changed during 2020

- *More staff working from home / remotely.*
- *New ways of working for non office staff to comply with Government guidance*
- *Increased use of online services for payment and bookings.*
- *Increased use of cashless payment.*
- *'Took our services on-line', increasing the provision of digital content so 'digitally open while physically closed'.*
- *The massive increase in visitor to the open spaces, due the pandemic, is having a negative long-term impact on the sites' biodiversity and infrastructure.*
- *Greater focus on generating additional income e.g. through new lease arrangements, licencing, donations, car park charging.*

Plans under consideration	Time Scale
<i>Offices unlikely to return to full capacity– long term use of office accommodation to be considered</i>	2022/23
<i>COVID19 operating models will inform future service operations.</i>	2021/23
<i>Approach to cycling to be reviewed across a number of properties</i>	2022/23
<i>Visitor attractions, may require re-setting of business models</i>	2021/23
<i>Prioritising high priority select bids for Capital that meet the precise capital funding criteria</i>	2021 onwards

Our Strategic Commitments

Below are some of the Corporate Strategy Actions we will help deliver

Apprenticeship Strategy

- Deliver apprenticeships within the organisation from levels 2 to 7, in terms of placements and training, which generate positive feedback from those involved in completing and delivering them and achieve target retention rates

Climate Action Strategy

- Introduce new land management practices across our open spaces aiming to maximise their ability to remove carbon, and optimise their biodiversity and resilience value
- Advocate the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing

Cultural Strategy

- Support cultural excellence in a range of fields and champion an ethos of innovation, creative risktaking and artistic citizenship
- Support the delivery of the City of London's Education Strategy by nurturing an exemplary Cultural Education Partnership

Responsible Business Strategy

- Contribute to delivering the various strategy actions, particularly under the strategy outcome: *The planet is healthier*

Social Mobility Strategy

- Remove barriers, overcome gaps and improve access and participation in order to improve attainment.

Sport & Physical Activity Strategy

- Contribute to delivering the various strategy actions, particularly under the strategy outcome: *People enjoy good health and wellbeing and health inequalities are reduced*

Volunteering Strategy

- Promote volunteering opportunities and benefits to drive more and better volunteering.

Key Departmental Risks

		0	6	3	Total = 9
	Likely (4)				
	Possible (3)		1	4	1
	Unlikely (2)			1	2
	Rare (1)				
		Minor (1)	Serious (2)	Major (4)	Extreme (8)
		Impact			

Departmental Risk Title	Score
Wanstead Park reservoirs	24
Repair and maintenance of buildings and structural assets	16
Maintaining the City's water bodies	16
Impact of development	12
Ultra Low Emission Zone (ULEZ) fleet purchase risk	12
The effect of a major event in central London on the tourism business at Tower Bridge and Monument	12
Pests and diseases	12
Health and safety	8
Extreme weather and climate change	6
These are reported Departmentally apart from Wanstead Park Reservoirs which is a Corporate risk	

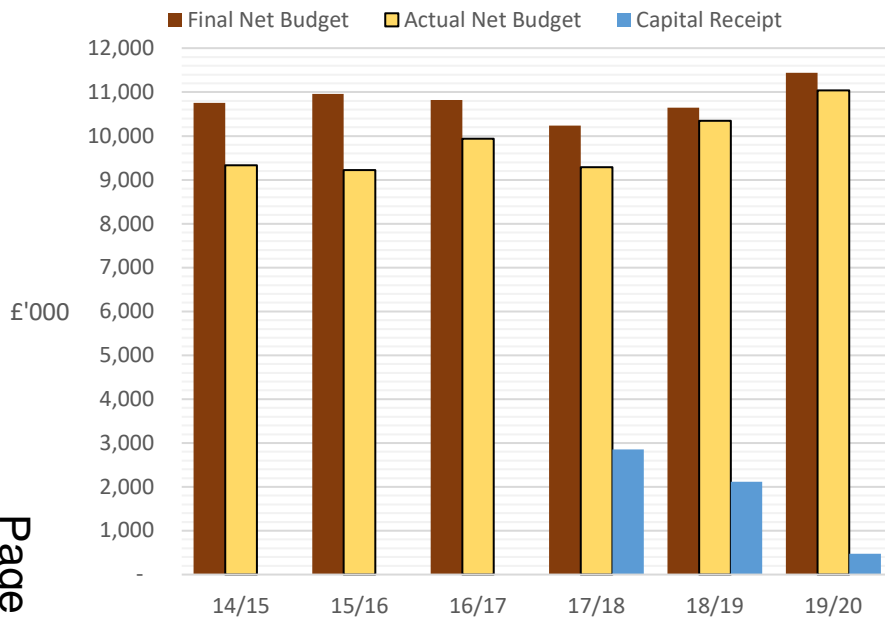
Open Spaces risks related to COVID-19

COVID-19 Risk Title	Score
Failure of Cemetery & Crematorium services	16
Income generation and financial management	16
Health and Safety of visitors and staff	12
Bridge lifts at Tower Bridge	6
Reopening services	4
Two additional risks are being considered for inclusion. The risks are:	
<ul style="list-style-type: none"> Accelerated long-term damage to sites Open Spaces workforce wellbeing 	
These risks are reported Corporately	

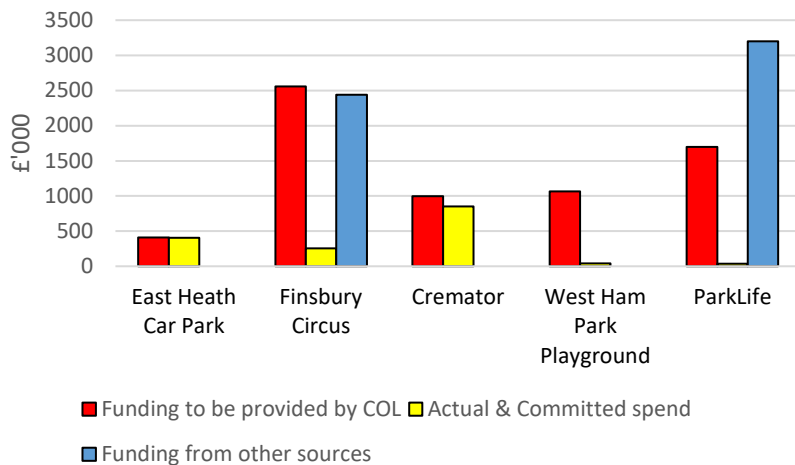
Equalities, Diversity and Inclusion Self Assessment	Score
Monitoring and use of data & information	4
Completing Equality Analysis and tackling discrimination and barriers to inclusion	3
Target setting and mainstreaming equalities into performance systems	N/A
Using procurement and commissioning to achieve equality and cohesion targets	N/A
Engagement and partnership	3
Employment and training	2
Where 4 is excellent and 2 is average	

Directors local risk

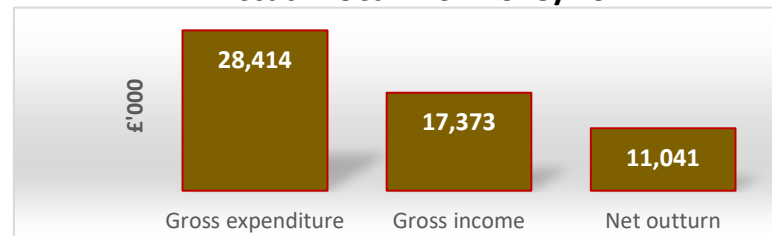
Net Budget vs Actual Net Budget and Capital Receipts



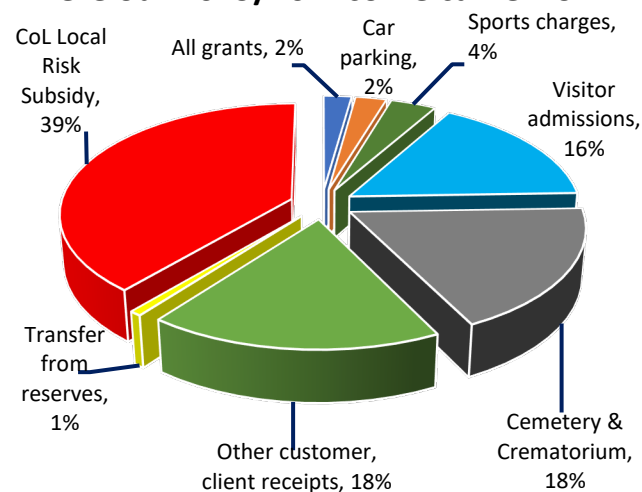
OSD Capital projects - showing anticipated COL and other funding plus spend to date



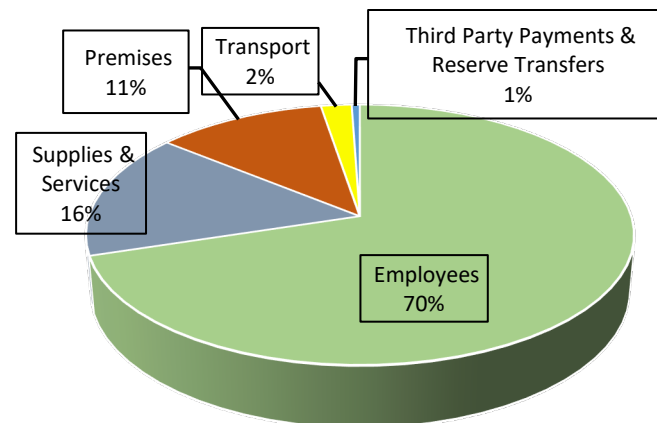
Actual Local Risk 2019/20



Where our 2019/20 income came from



How we spent our local risk budget in 2019/20



THE DEPARTMENT'S VISION IS:

We enrich people's lives by enhancing and providing access to ecologically diverse open spaces and outstanding heritage assets across London and beyond.

The Open Spaces Department's three top line objectives and twelve outcomes are:

A. Open spaces and historic sites are thriving and accessible

- ✓ Our open spaces, heritage and cultural assets are protected, conserved and enhanced (12)
- ✓ London has clean air and mitigates flood risk and climate change (11)
- ✓ Our spaces are accessible, inclusive and safe (1)
- ✓ Our habitats are flourishing, biodiverse and resilient to change (11)

B. Spaces enrich people's lives

- ✓ People enjoy good health and wellbeing (2)
- ✓ Nature, heritage and place are valued and understood (3)
- ✓ People feel welcome and included (4)
- ✓ People discover, learn and develop (3)

C. Business practices are responsible and sustainable

- ✓ Our practices are financially, socially and environmentally sustainable (5)
- ✓ London's natural capital and heritage assets are enhanced through our leadership, influence, investment, collaboration and innovation (10)
- ✓ Our staff and volunteers are motivated, empowered, engaged and supported (8)
- ✓ Everyone has the relevant skills to reach their full potential (8)

KEY: The numbers in brackets show how the Open Spaces Outcomes link to the twelve [Corporate Plan Outcomes 2018-2023](#).

Performance Measures	2020/21 Performance	2021/22 Direction of travel / target
Green Heritage Accreditation	13 Awards	13 Awards
Green Flag Awards	15 Awards	15 Awards
Active ancient tree management as part of the Stewardship Schemes at Epping Forest & Burnham Beeches.	As per Stewardship agreement - annual data not yet available	As per Stewardship agreement
The condition of our Sites of Special Scientific Interest	No new assessments in 2020 to enable any change to have been recorded	All re-assessed SSSI's are rated 'favourable' or 'unfavourable recovering'.
Number of visits to Open Spaces Departments webpages	647,457 to date	Increase
Tennis court usage	26,953 to date	Maintain
Customer satisfaction at Tower Bridge	New COVID19 related measure - annual	Maintain
Our environmental footprint	Annual data not yet available	Link to Climate Action Strategy
Net expenditure (OS local risk only)	Achieve readjusted budget	Achieve budget
Income generated (OS local risk)	Achieve budget	Achieve budget
Learning & volunteer programme - various measures	Annual data not yet available	Increase
Apprentice performance – various measures	Annual data not yet available	Maintain
Short term sickness	1.21 to date	Maintain
H&S accident investigations	88% to date	Corporate target

Appendix 2 - Key areas of work for 2021/22 for City Gardens, West Ham Park and the Directorate & Learning team

	Our key areas of work in 2021/22 will be...	What's changed during this year	Longer term plans
Directorate & Learning	<ol style="list-style-type: none"> 1. Support, monitor and co-ordinate the Department's implementation of its reduced budget envelope and the impact of the Target Operating model. 2. Develop and increase awareness of the donation's opportunities through the COL website; work with a third party provider to enable retention of Gift Aid, develop regular giving donation opportunities and legacies. 3. Review our 'concessionary fees and charges offer' and assess proposed changes with other CoL Departments and similar services across London prior to drafting new policy for Member approval. 4. Develop flexible learning in nature that addresses the restrictions and opportunities presented by COVID19 5. Learning offer targets schools with high pupil premiums 6. Learning offer targets children, young people and families who have been struggling due to COVID19 restrictions/impacts 	<ul style="list-style-type: none"> • Office staff have been effectively homeworking. Use of office accommodation unlikely to return to full capacity post COVID19. • COVID19 has placed restrictions on how the Learning team work with learning/school audiences. • Increased digital content enabled the learning services to be 'digitally open' whilst 'physically closed'. 	<ul style="list-style-type: none"> • With fewer people working from the Irish Chamber there arises an opportunity for CS to consider the long-term use of the property
City Gardens	<ol style="list-style-type: none"> 1. Progress Finsbury Circus refurbishment project. 2. Progress the replacement of Tower Hill playground subject to approval of capital funding 3. Continue develop and utilising technology to improve service provision 4. Fleet review completed and implemented 5. Launch new Biodiversity Action Plan 6. Contribute to climate action strategy actions, where relevant 	<ul style="list-style-type: none"> • Office staff have been homeworking whilst frontline staff have continued to come in. Use of office accommodation unlikely to return to full capacity post COVID19. • Server files have been restructured and all moved to Sharepoint. This has enabled greater connectivity between frontline and office staff and enabled effective remote working. 	
West Ham Park	<ol style="list-style-type: none"> 1. Refurbish the playground and seek additional funding to complete the extension 2. Working with CSD progress future use of nursery site 3. Tennis – relicence coaching provision and investigate flood lights on site 4. Café / ice cream concession – review and relicence on single concession once playground complete 5. Management plan – review and update management plan for site and circulate for consultation 	<ul style="list-style-type: none"> • Office use – reduced during lockdown, alternative methods of communication used. Use of office accommodation unlikely to return to full capacity post COVID19. 	<ul style="list-style-type: none"> • Cycling – issues during lockdown, need to look at high risk routes and mitigation measures (changes to gates/pathways may be required)

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Committee(s)	Dated:
Open Spaces and City Gardens Committee	2 December 2020
West Ham Park Committee	2 December 2020
Hampstead Heath, Highgate Wood and Queens Park Committee	7 January 2021
Epping Forest and Commons Committee	18 January 2021
Subject: Departmental Business Plan 2020/21 – Six month performance update: April to Sept 2020	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	Outcomes: 1, 2, 3, 4, 5, 8, 10, 11, 12
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Colin Buttery – Director, Open Spaces	For Information
Report author: Gerry Kiefer, Open Spaces	

Summary

This report provides Members with an update on progress and performance against the 2020/21 Business Plan. The Plan was agreed by Members in February 2020 before Covid 19 impacted on all our lives. Our Open Spaces and Parks have played a vital role during the pandemic, helping to keep the population well, both mentally and physically. However, managing additional visitors, working with a reduced staffing capacity, reacting to changes in Government legislation has impacted on our ability to deliver some aspects of the business plan and influenced our ability to achieve our performance measures.

Recommendation

Members are asked to:

- Note the report

Main Report

Background

1. The Open Spaces & City Gardens Committee approved the Departmental Business Plan 2020/21 (Appendix 1) on 3 February 2020.
2. The Department's Vision is; *we enrich people's lives by enhancing and providing access to ecologically diverse open spaces and outstanding heritage assets across London and beyond.*

3. The Business Plan identified the Department's three main objectives under which sit twelve outcomes which are set out on page one of the Business Plan (Appendix 1)
4. The Business Plan identified a range of activity that would help achieve the Department's twelve outcomes, and highlighted four key themes for progress in 2020/21 which were:
 - Maximise the value and opportunities of our built and natural assets
 - Protect and enhance our sites biodiversity and determine the value of our green infrastructure
 - Engage with the local planning processes to mitigate and protect against the negative impact of development on our open spaces
 - Develop innovative approaches to income diversification
5. The Business Plan identified annual capital bids that had been proposed to Resource Allocation Sub Committee (RASC) of which some were still awaiting decision when the Plan was agreed in February 2020.

Current Position

6. Before the financial year commenced, life as we had known it dramatically changed as the Coronavirus pandemic spread across the World and our Government introduced new regulations, asking us to; *Stay home, Protect the NHS, Save Lives*.
7. From March onwards it became clear that, particularly in and around London, where many people do not have access to gardens, our parks and green spaces would play a crucial role in keeping the population well, both mentally and physically.
8. During the last eight months, services have complied with changes in Government legislation seeing facilities and activities close, reopen and in some cases, close again. Our main aim has been to ensure the health and safety of our staff and visitors. Many new operational practices have had to be implemented and the provision of services have been re-prioritised to ensure delivery of key services with the resource capacity available.
9. Members have been regularly informed of the impact that Covid19 has had on the services through Committee updates and member briefing notes.

Progress of Key Themes

10. Below is detailed the progress that has been made against the four key themes of the Business Plan. Covid19 has required refocussing of resources and has resulted in some areas of work not progressing, or progressing less than would have been anticipated. However, the following progress has been made:

Key Theme	Activity Progress
Maximise the value and opportunities of our built and natural assets	<ul style="list-style-type: none"> Finsbury Circus Gardens reopened at the beginning of August. Architecture00 + Studio Weave with ReardonSmith Landscape were selected from a shortlist of five to redesign the Grade II-listed site. Anticipated completion now 2022/23 ➤ WHP Nursery Progress delayed due to Covid-19 and protracted correspondence with Charity Commissioners. Climate Action Strategy agreed by Policy and Resources Committee which includes a number of future actions that relate to Open Spaces.
Protect and enhance our sites biodiversity and determine the value of our green infrastructure	<ul style="list-style-type: none"> The Engineering study for Wanstead Reservoirs has been completed and an Issues paper was taken to the Corporate Project Board on the 11th November 2020. The issues report details the initial findings from the Panel Engineer (which show a likely lower level of capital spend) and requests approval for further feasibility study to look at the flow of water through the cascade of reservoirs and the linkage to the Roding river in terms of water in and out of the waterbodies. ➤ Covid and the High Court judgement on the third runway has delayed delivery of the Heathrow Airport biodiversity net-gain project. A scaled down version is currently being discussed with the National Trust and tenants. The project officer is exploring other sources of funding, including HS2 and Comprehensive spending review.
Engage with the local planning processes to mitigate and protect against the negative impact of development on our open spaces	<ul style="list-style-type: none"> Significant and extensive correspondence between Epping Forest's Local authorities and other partners, with changes to local plans required to ensure proper mitigation and protection of Epping Forest. ➤ The Commons officers continue to influence and comment on various local authorities planning documents, at their different stages of development.
Develop innovative approaches to income diversification	<ul style="list-style-type: none"> The Lockdown has required many facilities to temporarily close. On opening many introduced new on-line booking systems and cashless payments. ➤ First holiday let of a former Lodge was launched at Epping Forest through Sykes Holiday lettings. ▪ Projects were identified across the Department to attract public donations. Use of a third-party supplier to administer this and enable Gift Aid to be received was stalled due to the lack of Charity bank accounts and financial controls required by Chamberlains. As an interim, online payment through the COL's webpages has been developed and online donations should be available via the website from mid December 2020. A 'campaigns' approach has been adopted as the current financial regulations do not allow general donation income to be rolled across financial years.

Capital Funding Requests

- When the Business Plan was approved in February 2020, in principle capital funding had been agreed, subject to the usual gateway process, for West Ham Park Playground refurbishment, East Heath Car Park resurfacing and Chingford Golf Course. Subsequently RASC approved in principle funding for Finsbury Circus Reinstatement, ParkLife (Wanstead Football) both with

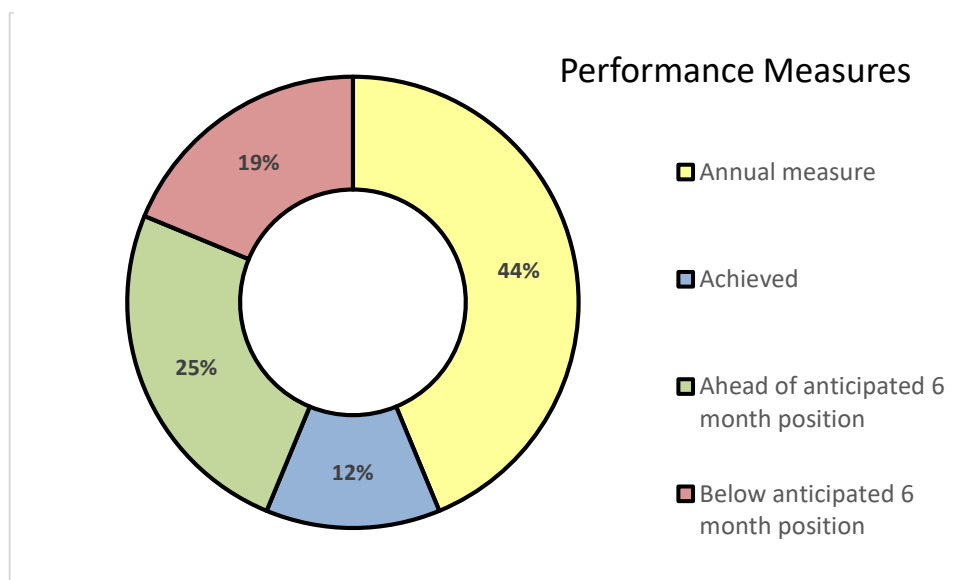
conditions. Funding was agreed at the start of the year for The Monument Visitor Centre and Queens Park Toilets, but a subsequent mid-year review withdrew this 'in principle' funding and these projects should be resubmitted annually if they remain a priority for the Department. Funding for Parliament Hill athletics track was turned down by RASC.

12. The relevant Service Committees have received more detailed reports on the progress of these 'approved in principle' capital projects.

Performance Measures

13. The Business Plan report identified sixteen performance measures. The majority of these are collated annually, but we have retained our 15 Green Flag Awards and 13 Green Heritage Site accreditations.
14. At 6 months we are above target for tennis participation following a large increase in court usage once lockdown was lifted. The pandemic has seen a significant increase in the number of people visiting our open spaces and this is mirrored in the number of visits to the open space's pages on the City of London's website.
15. Due to the impact of Covid19, apart from the Cemetery and Crematorium, the Department is below its expected position on income generation. The closure of our visitor attractions and then the significant reduction in capacity to meet social distancing guidelines means that our visitor numbers at our visitor attractions are significantly down on the same period last year.

Six month progress against annual performance measures



Implications

Financial Performance

16. Covid 19 has had a significant impact on the Department's finances. Many income generating services have been partly closed during the year including golf, tennis, swimming, sports pitches, wedding venues, visitor attractions (Tower Bridge, Monument, Keats house) and car parks. When allowed to open a few of these services such as golf and tennis were busier than normal and their projected 6 month income levels were achieved.
17. COVID19 has also impacted on expenditure with additional resources needed for health and safety equipment, waste and recycling, additional security costs and transport. In April the Department successfully bid for £65k internal COVID19 contingency fund money to help with the cost of additional health and safety equipment and changes to public reception areas.
18. On October 13 the City of London Corporation's Finance Committee received a Chamberlains report to address the deficit in lost income due to the COVID-19 pandemic and set realistic budgets that Chief Officers can be held to in this financial year (2020/21). For those services overseen by the Open Spaces Committee there has been a £66k readjustment of the local risk budget. This report titled '*resetting of Departmental Budget 2020/21*' is due to be an information report to this Committee on 2 December 2020.
19. Two further submissions for COVID19 contingency fund money were made in August 2020, but as the expenditure had already been captured in the budget forecasting that informed the budget readjustment report, these submissions were unsuccessful.
20. In order to track additional spend arising from COVID 19, the Chamberlains Department introduced a specific code for use on all expenditure. At the end of October 2020, £364.5k actual expenditure had been coded to the COVID19 special by the services for which this Committee is responsible. This includes approx. £100k loss of income from leases due to deferrals, rent holidays, discounts.

Corporate & Strategic Implications

Open Space Charities

21. Many of the Open Spaces sites are registered charities. Officers have been asked to remind Members that decisions they take in relation to the relevant charity must be taken in the best interests of the charity.

The Corporate Plan

22. The Open Spaces Department actively contributes to all the Corporate Plan aims:
 - Contribute to a flourishing society
 - Support a thriving economy
 - Shape outstanding environments

Conclusion

23. The Open Spaces Department has seen progress against some of the prioritised actions within its business Plan delayed due to COVID19 and some performance measures are below where they should be at 6 months.

Appendices

- Appendix 1 - High-level Business Plan 2020 -21
- Appendix 2 - Performance measures – position at 6 months, where available

Background Reports

Final Departmental Business Plan 2020/21 – Open Spaces, February 2020.

Gerry Kiefer

Business Manager – Open Spaces Department

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DEPARTMENT VISION:

We enrich people's lives by enhancing and providing access to ecologically diverse open spaces and outstanding heritage assets across London and beyond.

Department objectives:

Open Spaces Department's twelve outcomes:

A. Open spaces and historic sites are thriving and accessible.

1. Our open spaces, heritage and cultural assets are protected, conserved and enhanced (12)
2. London has clean air and mitigates flood risk and climate change (11)
3. Our spaces are accessible, inclusive and safe (1)
4. Our habitats are flourishing, biodiverse and resilient to change (11)

B. Spaces enrich people's lives.

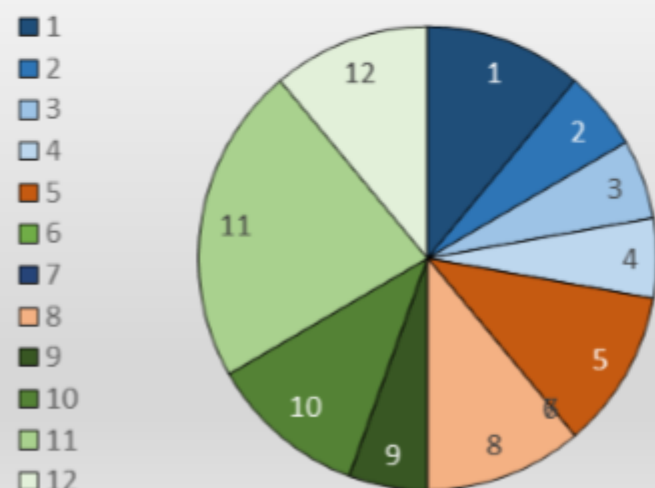
5. People enjoy good health and wellbeing (2)
6. Nature, heritage and place are valued and understood (3)
7. People feel welcome and included (4)
8. People discover, learn and develop (3)

C. Business practices are responsible and sustainable.

9. Our practices are financially, socially and environmentally sustainable (5)
10. London's natural capital and heritage assets are enhanced through our leadership, influence, investment, collaboration and innovation (10)
11. Our staff and volunteers are motivated, empowered, engaged and supported (8)
12. Everyone has the relevant skills to reach their full potential (8)

The numbers in brackets show how the Open Spaces outcomes link to the 12 Corporate Plan 2018 - 2023 Outcomes

Open Spaces Activity mapped to the 12 Corporate Plan Outcomes



Corporate Aim	%
A. Contribute to a flourishing society	28%
B. Support a thriving economy	22%
C. Shape outstanding environments	50%

The table overleaf lists all the activities we will be working on and developing this year.

Our key activities for 2020/21 will be:

- Maximise the value and opportunities of our built and natural assets (10c)
- Protect and enhance our sites biodiversity and determine the value of our green infrastructure (11b)
- Engage with the local planning processes to mitigate and protect against the negative impact of development on our open spaces (12b)
- Develop innovative approaches to income diversification (8d)

We will also be supporting the work of the Fundamental Review.

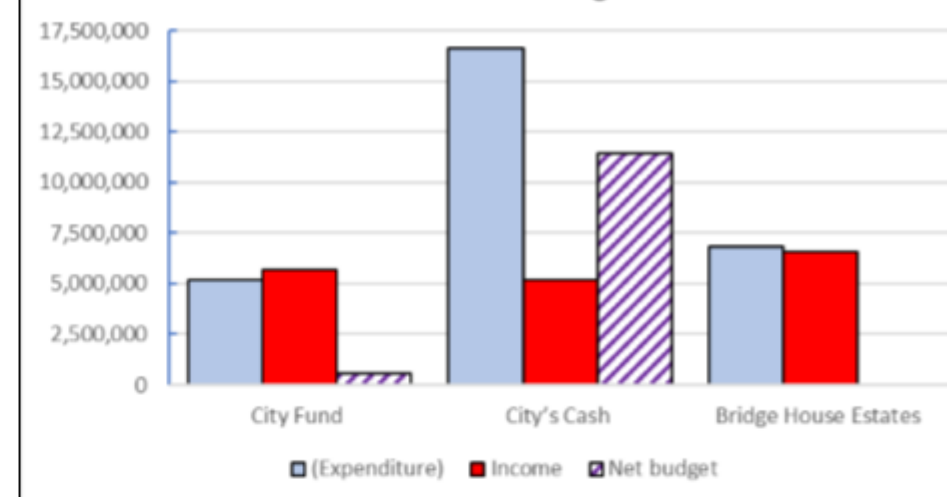
Appendix 1 provides the detail that sits behind these key activity statements.

Numbers in brackets show links to the outcomes and actions within the Corporate Plan 2018-2023

How we are funded

Appendix 1

OSD local risk budget 2020-21



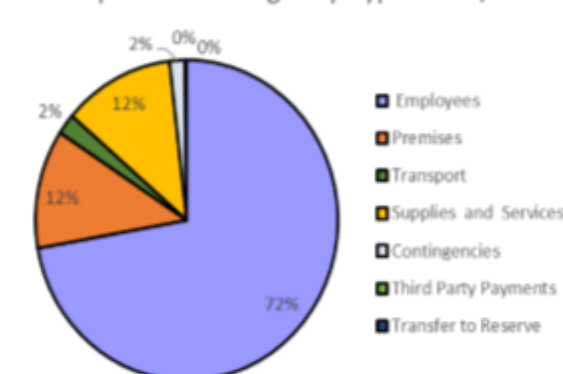
Bids for Capital Funding Agreed in principle by RASC:

- West Ham Park Playground
- East Heath Car Park
- Chingford Golf Course

More information requested by RASC:

- Finsbury Circus Reinstatement
- The Monument Visitor Centre
- ParkLife (Wanstead Football)
- Parliament Hill Athletics Track
- Queens Park Toilets (Chairman's request)

Expenditure budget by 'type' 2020/21



Our Reach and Impact



COL Staff Survey

TOP 3 Highest Scoring	%	BOTTOM 3 Lowest Scoring Questions	% Positive
I have the skills I need to do my job effectively	94%	The City of London Corporation manages change effectively	32%
I am interested in my work	93%	I believe that action will be taken on	33%
I am clear about what I am expected to achieve in my job	87%	Poor performance is dealt with effectively where I work	34%

Action Being taken includes:

Improving Communication: All staff updates from SLT and Committees, staff briefings on 'change' including fundamental review.

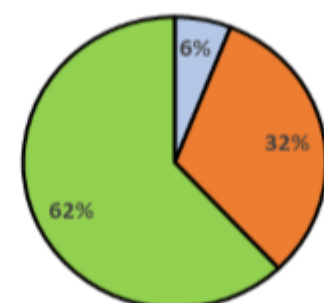
Leadership: Open door sessions, visibility of managers, one to one's, appraisals,

What's changed since last year...

- Completed the Programme of events celebrating 125 years of Tower Bridge and 30 years custodianship of Hampstead Heath.
- Natural England declare a new National Nature reserve; South London Downs NNR, covering Coulsdon Commons and Happy Valley, in partnership with the London Borough of Croydon
- Retendered OPM Control Methods contract and a partner with the Forestry Commission in their OPM pilot study.
- City Gardens fleet is ULEZ compliant
- Events policy agreed and implemented for the Department and all divisions
- Delivered improvement projects in City Gardens including Senator House and St Alphege's Gardens
- Introduce longer lease durations allowing greater capital investment / external funding capacity under powers created by the Open Spaces Act 2018

Key Customer Feedback

Visitors satisfaction rating of open spaces site from snapshot survey



Other Good Very Good

Equalities and Inclusion Priorities:

- Improve accessibility within our sites, subject to funding.
- Improve inclusivity at our sites.
- Increase our collection and analysis of 'protected characteristics' data
- Develop our Learning programme offer to Special Needs Schools.
- Implement the agreed transgender policy.

Performance Measures

We will contribute to a number of Corporate Performance Measures including: FOI responses, health and safety investigations, sickness absence, budgets, employee volunteering

We will also set Departmental performance measures including:

Performance Measure	Performance target 2019/20	Department Outcomes	Department Activity
Retaining Green Heritage Site Accreditation and Green Flag Awards	13 Green Heritage Awards 15 Green Flag Awards	Our open spaces, heritage and cultural assets are protected, conserved and enhanced	Protect our heritage: developing partnership funding bids where possible
Number of tennis courts booked	31,500	People enjoy good health and wellbeing	Provide a sustainable range of sports and recreational opportunities
Number of visits to our heritage visitor attractions	1,124,400 visits	People feel welcome and included	Improve the visitor and cultural offer
Active management of our ancient trees	Baseline	Our habitats are flourishing, biodiverse and resilient to change	Protect and enhance our sites biodiversity

Other activities that we will be undertaking this year under the headings of our three objectives.

Open Spaces and Historic Sites Are Thriving and Accessible

- Protect our heritage: developing partnership funding bids where possible (10d)
- Progress reviews, drafting, approval and implementation of management / conservation / heritage plans (11b)
- Reduce the negative environmental impacts of our activities (11a)
- Review security and access control provision (1c)

Spaces Enrich People's Lives

- Provide a sustainable range of sports and recreational opportunities (2d)
- Improve the visitor and cultural offer, including the development of facilities, new technologies, customer service and a programme of events celebrating our anniversaries, historic sites and nature (4a)
- Develop our 'learning offer' (3b)

Business practices are responsible and sustainable

- Deliver opportunities arising from improved management capability from the City of London Corporation (Open Spaces) Act 2018 (1c)
- Make more effective use of IT and technology and adopt 'smarter' ways of working (9b)
- Support the development of asset management plans and master plans for each site and influence the City Surveyors implementation of their operational property review (12a)
- Maintain our regional and national influence with regard to environmental, open space, burial, heritage and tourism matters (11d)
- Implement the recommendations arising out of the workforce plan, staff and customer surveys (8a)
- Develop our apprenticeship programme and volunteering opportunities across the Department (8d)
- Progress the prioritisation of services to mitigate inefficiencies and establish long term sustainable service provision (5c)

Appendix 1 provides the detail that sits behind these action statements.

◆ Numbers in brackets show links to the outcomes and actions within the Corporate Plan

Our delivery partners and key stakeholders include:

Local community groups, forums and local residents

Host and neighbouring local authorities and the GLA

Forestry Commission, Natural England and National Trust

Parks for London, GiGL, Action Oak

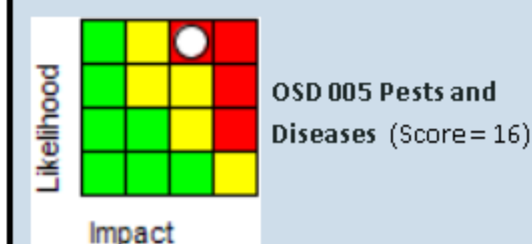
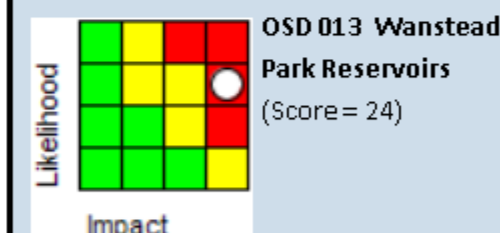
Historic England & English Heritage

National Governing Bodies of Sport and local sports groups









Consultation Committees and Forums









City of London Departments

Departments three red risks:



Appendix 2 - Performance measures – position at 6 months, where available

	Performance Measure Description	2020 / 21 Target (annual)		6 month performance (where available)
1	Green Heritage Site Accreditation	Retain 13 Awards		Achieved 13 Awards
2	Green Flag Awards	Retain 15 Awards		Achieved 15 Awards
3	Improving the condition of our Sites of Special Scientific Interest	All SSSI's that are re-assessed by Natural England are rated as being in 'favourable' or 'unfavourable recovering' condition.		Annual Measure
4	Reducing our environmental footprint	Reduction in utilities, increase in generated electricity		Annual Measure
5	Influencing planning authorities development approvals and planning policy documents	Influence planning applications and local plans		Annual Measure
6	Active management of our ancient trees as part of the Stewardship Schemes at Epping Forest and Burnham Beeches.	Epping Forest = 354. Burnham Beeches = 61.		Annual Measure
7	The number of 'visitors' to the Open spaces webpages.	930,000		647,457 Ahead of anticipated 6 month position
8	Learning & volunteer programme measures	Increase in positive and very positive responses to the 'learning impacts'		Annual Measure

	Performance Measure Description	2020 / 21 Target (annual)		6 month performance (where available)
9	Increase the number of visits to our heritage visitor attractions (This includes Tower Bridge, Monument, Keats House, The Queens Hunting Lodge hub and The Temple)	No target set due to Covid19 requiring facility closure		33,278 Below anticipated 6 month position
10	Improve customer satisfaction at our heritage visitor attractions (This includes Tower Bridge, Monument, Keats House, Epping Forest experience)	Improvement at Tower Bridge, Keats House and Epping Forest experience		Annual Measure
11	Increase the number of hours of tennis court usage	No target set due to Covid19 requiring facility closure		26,953 Ahead of anticipated 6 month position
12	Apprentice performance	81% pass their training qualification 20% get jobs, 25% progress from level 2 to level 3		Annual Measure
13	Average number of days per FTE short term sickness	3.37		1.21 Ahead of anticipated 6 month position
14	Health and safety accident investigations	85%.		88% Ahead of anticipated 6 month position
15	Open Spaces Department (all) Net expenditure (OS Director local risk only)	£11,531,000		£6,724,383
16	Open Spaces Department (all) Income generated (OS Director local risk)	£17,762,000		£6,309,925

Committee(s)	Dated:
West Ham Park Committee	2 December 2020
Subject: West Ham Park Managers Update	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 2, 3, 4, 9, 10, 11, 12
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Colin Buttery	For Information
Report author: Lucy Stowell-Smith	

Summary

This report provides an update to Members of the West Ham Park Committee on management and operational activities at West Ham Park since October 2020. The funding for the work stated is met through the parks local risk budget, apart from the Friends of West Ham Park's Exhibition which is being paid for by external funding raised by the friend's group.

Recommendation(s)

Members are asked to:

- Note the report

Main Report

Budget and Personnel

1. **Budgets:** Budgets continue to be impacted by lockdown. November has seen the closure of the tennis courts and cricket nets and all football matches have been cancelled and goal posts removed to discourage games from being played on site. This will further impact our income levels by up to £3-5K.
2. **Staffing:** One of our Keepers left the team in November. She was responsible for obtaining the funding for the south meadow project and was always an advocate for biodiversity and conservation on site and will be missed by the team and local community. We have not recruited for the role but have employed two temporary staff for November to assist with winter maintenance tasks. A new learning officer has been seconded from another role within the learning team and will join the team until March 2020.

Community, Volunteering, Outreach and events

3. **Visit by The Lady Mayoress:** The Lady Mayoress visited site in October, with the Chair, Deputy Chair and Superintendent. She had an enjoyable visit during which she met the park's Bee Keepers and various members of the friends group whom she thanked for their help and support during the coronavirus pandemic. A downpour of rain and hailstones unfortunately cut the tour of the ornamental gardens short, however it meant that she had time to learn about the exhibition that the friends have been developing for the gardens and see the proofs of the new signage. She was very interested and impressed by the work that they have carried out and has stated that she would like to come and visit the gardens again and open the exhibition next year.
4. **Wild Schools:** Learning officers from other Open Spaces sites have been supporting local schools and providing tailored support required by some groups e.g. SEND group at Odessa primary school. A new learning officer as mentioned above has now started with the team and is planning Christmas themed activities such as wreath making and is working with the Park and Learning Manager to agree the programme for 2021.
5. **Friends of West Ham Park:** Lockdown has resulted in all normal autumn and winter activities being cancelled. The group held their first on-line zoom meeting in October and is hoping to hold socially distanced or 'virtually' supported bird count for the RSPB in January. Weekly Health walks have been cancelled in line with government guidance and advice from the Ramblers association who run the scheme. The vegetable garden volunteers are still tending the garden, however only two people are permitted in the garden at a time, again in line with government guidance.

Operational activities

6. The second lockdown phase has again seen increasing numbers of visitors to the park. Around twice as many people are being seen on site compared to normal visitor numbers for this time of year, however we have not seen the anti-social behaviour that was seen in the spring. All facilities, apart from the toilets are closed and no team sports are permitted on site. Schools continue to use the park for outdoor exercise, sport and lessons.
7. The keeper and gardening teams are focused on key maintenance tasks such as leaf clearance as all other projects have been put on hold to offset expenditure in other areas which has taken priority this year i.e. additional staff during the first phase of the pandemic and personal protective equipment etc and lack of income from facilities and events.
8. *Playground – A separate issues report is being presented to committee regarding the project. However additional work is continuing to seek the remaining £350k required to fund the extension to the playground with support from the Deputy Chair. A donations page is being developed and other*

sources of funding and fundraising being explored. A full report will be brought to February committee with further details.

Property Matters

9. **CWP programme:** external decoration works have begun to lodges across the park. Funding has been prioritised to ensure longevity of buildings and to bring the appearance of the external railings and fencing up to standard.
10. **COVID funding:** The park team are working with the City Surveyor to agree the design for a new window to be installed into the office. The hatch style window will allow contractors to sign in and deliveries be accepted without the need for individuals to enter the office, thus reducing any COVID risk and in accordance with the building's Covid-compliant risk assessment. The new hatch and intercom will provide a much better interface between the park office and the public and will be linked to a mobile phone for times when the office is not occupied.

Report author

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Committee(s)	Dated:
West Ham Park Committee	2 nd December 2020
Open Spaces and City Gardens Committee	2 nd December 2020
Subject: CWP 21/22 Updated Bid Report	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1,2,4 and 12
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£0
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: City Surveyor	For Information
Report author: Alison Bunn – Head of Facilities Management	

Summary

In July 2020 details of the proposed Cyclical Works Programme (CWP) bid list for 21/22 were presented to this committee. The report detailed the proposed bid for the properties within your Committee's remit. Since that report was presented and considering the Covid-19 pandemic a review has been undertaken of the CWP bid for 21/22 and it has been reduced. Only Health & Safety related projects will now be undertaken in 21/22 which has reduced the overall CWP bid list down from £12m to £4m, this reduction allows for the City to make savings to help its immediate financial pressures and for the project delivery team to catch up after a period of non-activity at the start of the Covid-19 pandemic and lockdown.

This report sets out the details of projects which will now be undertaken in 21/22 and details of the projects that will be delivered within that year which form part of the previous year's programmes.

In addition, the Chairman of Corporate Asset Sub Committee requested that Officers review the current CWP approach and whether it requires updating after 4 years in operation. This exercise has been undertaken and the findings presented to Corporate Asset Sub Committee on the 15th September 2020, these proposals were approved and therefore this report also sets out the main changes to how the CWP will operate and be delivered in year 22/23 onwards.

Recommendation(s)

Members are asked to:

- Note the contents of this report

Main Report

Current Position

1. At Corporate Asset Sub Committee on the 15th September 2020 they approved a reduced CWP bid for 21/22 to allow for works delayed due to Covid-19 to be brought back on schedule and for the new CWP approach to be implemented for year 22/23.
2. Since then Officers in City Surveyor's and Open Spaces have been working to identify any further projects which need to take place in 21/22 and cannot be deferred. The details below highlight the projects that will now proceed across the Open Spaces portfolio.
3. The headlines for all Open Spaces are:

Total Original 21/22 CWP Bid	Revised 21/22 CWP Bid	Project Delivery 21/22
£1,596,800	£434,000	£1,131,473

4. As a result, the following works for Open Spaces will be undertaken in 21/22:

City Cash – Total Value £374,0000

Location	Property	Project Title	Budget cost
Epping Forest	The Obelisk, Warren Field, The Warren	DECORATION & LIMEWASH	£2,500
Epping Forest	Queen Elizabeth Hunting Lodge	EXTERNAL LIMEWASH & OVERHAUL	£25,000
Epping Forest	Queen Elizabeth Hunting Lodge	INFILL PANELS LIME DAUB OVERHAUL	£6,000
Keats House	Keats House	SECURITY ALARM REPLACEMENT	£15,000
10 Keats Grove	10 Keats Grove	SECURITY ALARM REPLACEMENT	£15,000
The Monument	The Monument	SECURITY ALARM REPLACEMENT	£1,500
10 Keats Grove	10 Keats Grove	FIRE ALARM REPLACEMENT	£15,000
Keats House	Keats House	Keats House CCTV Replacement	£14,500

Open Spaces	Bunhill Fields Burial Ground	MEMORIALS BREAKDOWN	£30,000
Open Spaces	Bunhill Fields Burial Ground	MEMORIALS CONSERVATION	£125,000
Open Spaces	Bunhill Fields Burial Ground	NOTABLE MEMORIALS OVERHAUL	£15,000
Hampstead Heath	Lido Buildings	SHOWER & TOILET REFURBISHMENT (MALE & FEMALE)	£14,000
Hampstead Heath	Lido Buildings	PA SYSTEM REPLACEMENT	£7,000
Hampstead Heath	Lido Buildings	CABLE RATIONALISATION	£3,500
Hampstead Heath	Mixed Bathing Pond	SEWAGE PUMPS AND CONTROL GEAR REPLACEMENT	£25,000
Hampstead Heath	Mixed Bathing Pond	FENCING REPLACEMENT	£20,000
Hampstead Heath	Traditional Playground	PADDLING POOL REPLACEMENT	£40,000

City Fund – Total Value £60,000

Location	Property	Project Title	Budget cost
CoL Cemetery & Crematorium	Modern Crematorium	CREMATOR No. 1 REFRACTORY	£60,000

5. The overall provisional CWP 21/22 bid for Open Spaces was £1,596,800 this is therefore a significant reduction in this amount.
6. Only projects with the highest health and safety score have been put forward in the bid list for 21/22 and it is expected that they will be delivered within that year.
7. Appendix A includes a list of all projects put forward for the original 21/22 bid and are now deferred. This is broken down into each area of Open Spaces.
8. Any projects not funded will be moved to the bid list for 22/23 and with the new CWP approach approved by Member's there is commitment to fund and deliver all projects within the bid list which is put forward.
9. Whilst only a reduced bid is agreed for 21/22, there are already c.265 projects to Open Spaces which have already received funding with a combined value of c.£4.2million. These will be delivered through the usual CWP process over the next 3-4 years. The delivery of all CWP programmes is being smoothed

over 4 years rather than the traditional 3 years, this is to assist in the overall financial forecasts of the City.

These projects are:

Merlewood Est Office Landlords Lighting Power Rewire	12,000
Epping Forest Museum CCTV Replacement	2,500
Epping Forest 1 Keepers Lodge Landlord Lighting Power Rewire	6,000
Epping Forest 2 East Lodge Warren Landlords Lightings Power Rewire	6,000
Epping Forest 2 Keepers Lodge Wanstead Park Landlords Lighting Power Rewire	6,000
Epping Forest 46 The Plain Landlords Lightings Power Rewire	6,000
Epping Forest Info Centre Security Alarm Replacement	2,000
Epping Forest The Warren Office Access Control System Replacement	7,000
West Ham Park Boundary Fence Wall Decorations to Gates Railing Inside Park	33,500
West Ham Park Vehicle Shed Refurbishment	78,574
Bunhill Fields Burial Garden Brickwork Overhaul to Boundary Wall	9,100
Bunhill Fields Burial Signage Replacement	10,000
Bunhill Fields Fence Decoration Around Graves	18,000
Bunhill Fields Fence Decoration Around Memorials	2,500
Bunhill Fields Paving Overhaul	6,000
Bunhill Fields Railings Decorations External	17,349
Golders Hill Park 1 2 Golders Hill External Decorations	1,593
Golders Hill Park 1 2 Golders Hill House Kitchen Refurbishment	10,000
Golders Hill Park 1 2 Golders Hill House Windows Replacement	11,000
Hampstead Heath General/Infrastructure Drainage Survey	89,061
West Heath Pergola Strengthening	25,000
Crem Fitters Workshop Walls repointing / overhaul	10,000
Crem Haywood Centre Roof replacement	125,000
Crem Main Entrance lighting replacement	15,000
Crem Staff kitchen refurbishment	4,000
Crem Staff shower room refurbishment	9,500

Highgate Wood Education Hut Photovoltaic Cells Condition Refurbishment	3,000
Epping Forest Mains Water Replacement	36,000
Epping Forest The Warren Office Electric Gates Replacement	24,000
Epping Forest Museum Store Fire Alarm Replacement	12,000
Open Spaces Bunhill Fields Brick Structures Remedial Works	3,500
Golders Hill Park Cafeteria Fire Alarm Replacement	10,000
Golders Hill Park Cafeteria Electrical Intake Replacement	8,147
Golders Hill Park Cafeteria Public Toilets Lighting Emergency Lighting Replacement	5,000
Queens Park Toilet Block Refurbishment	35,000
West Heath Pergola Engineer to Monitor Structures	2,500
Open Spaces Garden Churchyard Paved Areas	7,643

Cemetery Crematorium Various Cess Pit Survey	19,946
Cemetery Crematorium Modern Crematorium Landlords Lighting Power Rewire	120,000
Cemetery Crematorium Road Resurfacing	48,000
Cemetery Crematorium Chapels Modern Crematorium Roof Replacement	180,000
Cemetery Crematorium Modern Crematorium Roof Replacement	50,000
Cemetery Crematorium Modern Crematorium Scissor Lift Refurbishment	3,060

Hampstead Heath General Infrastructure Valve Replacement all ponds	36,000
Parliament Hill Fields General Drainage Overhaul	40,000
Hampstead Heath Drainage Overhaul general	50,000
Parliament Hill Fields Hot Water Plant Replacement	50,000
10 Keats Grove Fire Alarm Replacement	15,000
Cemetery Crematorium Main Entrance / Gatehouse/ Parking Area Parking Area Resurfacing	30,000

Moving Forward - New Approach

10. The following at the key changes to the CWP which were approved at Committee on the 15th September 2020:

- Moving to a condition-based maintenance approach through the new Computer Aided Facilities Management (CAFM) system currently being procured and due to be implemented Autumn 2021
- Focus the programme delivery into a single financial year
- Removal of smaller value projects under £10,000 by uplifting the City Surveyor's, DBE's or Barbican's local risk budget respectively (using funds previously earmarked for the CWP) to allow project delivery to focus on the larger scale projects
- Altering the project prioritisation matrix to make it more fit for purpose and a fairer system for all properties
- Smoothing of the already agreed CWP programme to create a '4th' year
- Introduction of 3-5 yearly building condition surveys funded from funds previously earmarked for the CWP

Corporate & Strategic Implications

11. Cyclical Works Programmes set out to deliver three of the key objectives in the Corporate Property Asset Management Strategy.

- SO.1 – Operational assets remain in a good, safe and statutory compliant condition.
- SO.2 – Operational assets are fit for purpose and meet service delivery needs.
- SO.3 – Capital and supplementary revenue programmes are affordable, sustainable and prudent and that the limited available resources are directed to the highest corporate priorities.

Conclusion

12. This report is to update Members on the reduced CWP 21/22 bid for Open Spaces and explain the new approach for the CWP which will be adopted from year 22/23 onwards which has been approved by the Corporate Asset Sub Committee.

Report author

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Appendices

- Appendix A – 21.22 CWP Deferred Projects

Appendix A

CWP Proposed Bid List 21.22

Original Actual List now on the Deferred List

Building	Project	Cost
Ornamental Gardens	BRIDGE INSPECTION	1,500
Ornamental Gardens	ROSE GARDEN PERGOLA OVERHAUL	1,500
	Total	£3,000

Original Reserve List

Building	Project	Cost
South Lodge	ROOF INSULATION	1,500
South Lodge	ROOF REPLACEMENT (ASPHALT)	2,500
Portway Lodge	ROOF INSULATION	1,500
1 Linden Cottage	ROOF INSULATION	1,500
2 Linden Cottage	ROOF INSULATION	1,500
1 Margery Park Cottage	ROOF INSULATION	1,500
Pavilion Office	ROOF OVERHAUL (PLAIN TILES)	15,000
Ornamental Gardens	FOOTPATH OVERHAUL (BRICK PAVOUR)	6,000
Sports Changing Room	LOUVRE REPLACEMENT	5,000
Bandstand	TARMAC RESURFACING	10,000
East Lodge	FOOTPATH REPLACEMENT	15,000
Park Cottage	HARDSTANDING REPLACEMENT	7,000
Portway Lodge	FOOTPATH REPLACEMENT	7,000
1 Linden Cottage	FOOTPATH REPLACEMENT	7,000
West Ham Park	BOLLARD REPLACEMENT MAIN GATES	9,500
Sports Changing Room	EMERGENCY LIGHTING BATTERY REPLACEMENT	1,000
Bandstand	LUMINAIRES REPLACEMENT	3,000
South Lodge	RAINWATER GOODS REPLACEMENT	3,000
Park Cottage	FENCING REPLACEMENT	15,000

Portway Lodge	RANWATER GOODS REPLACEMENT	3,000
1 Linden Cottage	RAINWATER GOODS REPLACEMENT	3,000
2 Linden Cottage	RAINWATER GOODS REPLACEMENT	3,000
1 Margery Park Cottage	RAINWATER GOODS REPLACEMENT	3,000
2 Margery Park Cottage	RAINWATER GOODS REPLACEMENT	3,000
Sports Changing Room	BRICKWORK REPOINTING	20,000
Vehicle Shed, Mess Room (Nursery)	FLOOR PAINTING (VEHICLE SHED)	2,500
Shelters	DECORATION FOR 3 x SHELTERS	15,000
Shelters	SHELTER BENCHES DECORATION	1,500
1 Margery Park Cottage	WINDOWS REPLACEMENT	30,000
2 Margery Park Cottage	WINDOWS REPLACEMENT	30,000
General	CORPORATE SIGNAGE OVERHAUL & REPAINT	15,000
Sports Changing Room	FASCIA BOARD REPLACEMENT	6,000
Total		£248,500

Committee:		Date(s):
Open Spaces and City Gardens Committee	For Information	
West Ham Park Committee	For Information	
Subject: Planning White Paper		Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?		2, 3, 4, 11, 12
Does this proposal require extra revenue and/or capital spending?		No
Report of: Remembrancer and Director of Open Spaces Report Author Philip Saunders, Parliamentary Affairs Counsel		For Information
Summary		
<p>Overall reform of the planning system and the protection of green and open spaces are the two themes within the scope of the Government's Planning White Paper, 'Planning for the Future'.</p> <p>The White Paper proposes the creation of three land classifications. 'Growth' areas where land will be deemed suitable for substantial development; 'Renewal' areas suitable for some development; and 'Protected' areas, which will be subject to strict rules on development.</p> <p>The City Corporation's historic development has resulted in it being responsible for the protection and management of almost 11,000 acres of important open space across London and the Home Counties, including ancient woodland, Epping Forest Special Area of Conservation (SAC) and Burnham Beeches SAC and Sites of Special Scientific Interest (SSSI). Hampstead Heath is designated as Metropolitan Open Land (MOL).</p>		

The Square Mile has approximately 200 small park and garden areas, churchyards and landscaped sites. The plant and animal life enhances the local environment and contributes to the City being a welcoming place to live and work.

A City Corporation response has been submitted to the White Paper, in consultation with the Director of Open Spaces. This Report follows the points made in that submission, a copy of which is annexed. The submission has been made subject to any further observations which members of this and the other committees dealing with open spaces might wish to make.

Recommendation

The Committee is invited to note the contents of this report and to consider whether any additional observations should be made to the response to the White Paper.

Main Report

Background

1. The White Paper was introduced by the Prime Minister as the most "radical" set of planning reform proposals since the Second World War. The promotion of design concepts to promote "building beautiful" attracted most attention.
2. Under the proposals, which are dominated by changes to the house-building system, land will be classified as 'Growth', 'Renewal' or 'Protected'. Growth areas will be regarded as suitable for substantial development, and where outline approval for development would be automatically secured for forms and types of development specified in the Local Plan. Renewal areas would be suitable for some development, which the White Paper exemplifies as "gentle densification". Protected areas would be framed so as to protect green, open and heritage areas.

3. Much of the rationale underpinning the White Paper is concerned with increasing housing supply. Arising from findings by the Building Better, Building Beautiful Commission, that often buildings are of low quality and considered ugly, some effort at amelioration is contained in the concept of 'building beautifully', which was to have been championed on the Government's behalf by Professor Sir Roger Scruton. Nicholas Boys Smith of the think tank Create Streets took on the project following Sir Roger's death.
4. The White Paper indicates that there will be further consultation on environmental protections.
5. The proposals are of interest to the City Corporation as guardian of green spaces and as a local planning authority.

Political Commentary

6. Secretary of State for Housing, Communities and Local Government Robert Jenrick described the White Paper as intended to "support the delivery of the number of homes we need as a country, but homes that local people want to live in, with more beautiful, safer and greener communities". If implemented, the proposals would result in a "dramatically accelerated planning system", he said. He warned planning authorities that his Department would "intervene" if Local Plans were not in place by December 2023. Minister Chris Pincher insisted the proposals put "the creation of beautiful places at the heart of national planning policy, encouraging greater use of design codes based on what people want to see in their area, supporting local authorities and directing Homes England to help deliver that".
7. Labour's John Healy agreed the planning system was in need of reform but described the Government's approach as a "threat to give big developers a freer hand to do what they want, ignoring quality, affordability and sustainability". Matt Western (Lab) described the proposals as "a developers' charter, giving them

sweeping power to build poor-quality homes and, importantly, avoid commitments to build truly affordable social rented homes". Chair of the MCHLG committee, Clive Betts (Lab) welcomed the consultation as an overdue examination of the planning system.

The White Paper

8. The City Corporation cares for green spaces such as Hampstead Heath which are of considerable historical, cultural and ecological significance, noted most recently in Forestry Commission's London Tree and Woodland Awards, and sites of international importance, including Epping Forest Special Area of Conservation (SAC) and Burnham Beeches SAC and Sites of Special Scientific Interest (SSSI).
9. The White Paper propositions substantial changes to planning rules. Of interest to your Committee is the creation of a category of land that would be subject to "more stringent development controls" due to particular environmental and cultural characteristics, defined as 'Protected' land.
10. Areas to be regarded as Protected are not described in detail and no definition is provided. Instead, the White Paper gives examples, including Green Belt, Areas of Outstanding Natural Beauty, Conservation Areas, Local Wildlife Sites, "important areas of green space" and gardens, in line with existing policy in the National Planning Policy Framework. The proposals indicate gardens could fall within the Protected classification, alongside "important areas of green space environmental and/or cultural characteristics". The proposals would allow Protected areas to be defined nationally and locally. Local Plans would indicate such areas. Many City green spaces are within the scope of the examples of areas proposed to be designated as Protected land. Because of the wide framing of the examples set out in the White Paper, it seems likely that other areas, such as Hampstead Heath and SSSIs, are likely to be encompassed by the proposals but the position is not entirely clear.

12. Relevant to the City Corporation's guardianship of green and open spaces, therefore, the submission highlighted the following matters

- a. The nature and extend of the City's guardianship of green and open spaces, paragraphs 2-6, 15 of the White Paper response
- b. If the proposals on land designation are adopted, the examples of the Protected classification should be expressly extended to include SSSIs, SACs, MOL and Special Protection Areas (SPAs), paragraphs 14, 18-19, 20-21, 25-26
- c. The importance of buffer lands, for example at Epping and Burnham, as means to guard against encroachment, paragraph 16
- d. The Government should make provision for existing protections for green and open spaces to be automatically carried over to the proposed Protected areas, so as to avoid any attrition on such areas during the transition to the new arrangements, in paragraphs 17, 24-26
- e. The importance of protecting MOL in the context of proposals to set local housing allocations at a national level, in paragraphs 22-23
- f. The importance of ancient woodlands and local wildlife sites, paragraphs 24-25
- g. That the proposed housing formula should recognise constraints on building, such as in the case of green spaces, in paragraph 27
- h. That further consultation will be required regarding the development of further guidance on conserving heritage assets, which should involve Historic England, other heritage organisations and Local Planning authorities, in paragraph 75.

Conclusion

13. Officers will continue to find and create opportunities for pressing the interests of City Corporation green spaces, including select committee inquiries. Further committee Reports will be presented as required.
14. Site-specific committees will receive reports tailored to their interests. The planning aspects of the White Paper have been reported separately.

Philip Saunders

Parliamentary Affairs Counsel

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ANNEX

The Planning White Paper “Planning for the Future”

Response from the City of London Corporation
Submitted by the Office of the City Remembrancer

Introduction and Background

1. This consultation response firstly explores the White Paper's proposals regarding green spaces and the Protected designation and, secondly, sets out the City Corporation's views on individual planning proposals. A summary of the City's key messages is contained in the conclusion.
2. The City Corporation's historic development has resulted in it being responsible for the protection and management, by charitable trust, of almost 11,000 acres of highly important open space. Within this acreage, the City Corporation manages one of the largest assemblages of ancient woodland under single care and looks after one of the largest groups of ancient trees.
3. This land is situated across London and the Home Counties; much of the land is outside the City Corporation's area.
4. The Square Mile has approximately 200 small park and garden areas, churchyards and landscaped sites. The plant and animal life enhances the local environment and contributes to the City being a welcoming place to live and work.
5. Among the spaces located outside of its geographic area, the City Corporation cares for green spaces that are of international importance and renown, including Epping Forest Special Area of Conservation (SAC) and Burnham Beeches SAC and Sites of Special Scientific Interest (SSSI). Hampstead Heath and other areas of considerable historical and cultural significance are designated as Metropolitan Open Land (MOL).
6. The City Corporation has, therefore, a central objective of protecting and conserving the ecology, biodiversity and heritage of its open spaces.
7. The City of London Corporation is the governing body for the 'Square Mile' and is the planning authority for the geographical square mile at the heart of the Capital. The City Corporation's role as Local Planning Authority, includes responsibilities for all aspects of land use planning, the preparation of the Local Plan, the determination of planning applications and the designation and operation of s106 planning obligations and the Community Infrastructure Levy.
8. The City of London is a globally important financial and business district, and as such is subject to distinctive planning considerations. The Government's drive to improve the supply of housing is laudable, but it is important to make sure that the White Paper's proposals do not inadvertently undermine the protections in place for commercial areas such as the City. The Square Mile has a particularly high scale and density of office-led development, required to sustain the critical mass of commercial activity which drives the City's success, and which makes a significant contribution to the UK's GDP. With this comes a need to exercise

careful control over the location of new residential development, in a way that may not be the case elsewhere. Such control is necessary in order to maintain the concentration of commercial premises and preserve redevelopment potential (which could otherwise be prejudiced by long residential tenancies).

9. The special considerations applying to the City are recognised in the planning framework. The City's Local Plan contains specific protection against the loss of suitable office space and resists residential development inappropriate to the City's commercial character. This approach was endorsed by the Planning Inspector appointed to consider the compatibility of the Local Plan with national policy. The London Plan, meanwhile, specifically acknowledges that the balance between homes and offices should be adapted "to sustain strategically important clusters of commercial activities such as those in the City of London" and that residential development is inappropriate in the commercial core of the City.
10. This does not mean that the City Corporation is unsympathetic to the need to deliver more housing. Indeed, the Corporation recognises housing as one of the most pressing issues facing London's economy. The planning considerations described above mean that most of the City Corporation's contribution will necessarily be made outside the boundaries of the City (whether on its social housing estates in neighbouring London boroughs or on other land). Limited housing development may be possible within the City, but only on smaller sites in carefully defined areas away from core commercial activity.
11. There is no reason why national planning policy cannot combine a general objective to promote housing with sensitivity to the particular needs of leading commercial districts such as the City. The consultation, however, over-concentrates on housing; more consideration should be given to other forms of development, for example, development necessary to support economic growth, social and community facilities, open and green space and mitigating and adapting to climate change. This approach requires careful drafting, with potential unintended consequences borne in mind and suitable flexibility incorporated where needed.

Pillar 1: Protected Areas and planning for development

Proposal 1: The role of land use plans should be simplified.

Protected Areas

12. The commitment recorded in the White Paper in relation to a further consultation on environmental protections is welcomed. The proposals in the present consultation affect environmental protection matters to such an extent, however, that the totality of the issues should be considered together, not separately.
13. The White Paper's proposal to create a Protected category of land is welcomed but must be placed in the context. In the last 40 years there has been a decline of

over 60% in native species. The abundance of important wildlife groups such as pollinating insects have fallen by similar percentages.

14. The City Corporation is particularly concerned, therefore, that the White Paper does not list all significant categories of green space as being within the Protected category. The proposals identify, for example, some nationally significant designations such as Green Belt (GB) as intended to be within the Protected category but fails to identify designations of some of the most important sites for nature conservation. For example, although the consultation refers to Sites of Special Scientific Interest (SSSIs) in relation to looking back on past achievements of the existing planning system, there is no explanation of the vital importance of these sites for the future. There is no reference to Special Areas of Conservation (SACs) or Special Protection Areas (SPAs) in the White Paper despite these sites forming the bedrock of biodiversity protection in the UK, granted the highest legal protection through the UK Habitats Regulations 2017 (as amended) and the Bern Convention (1979). The consultation seems not to take into account recent planning inspectorate decisions which emphasise that these protections are crucial to tackle the vulnerability, from nearby developments, of sites such as Epping Forest SAC.
15. The City Corporation protects two such internationally important sites at Burnham Beeches and Epping Forest and has invested significant time and resources in their enhancement and protection over more than a century. In Epping Forest, for example, the City Corporation protects more ancient trees than any other site in the UK. Together, the two sites protect over 80% of all ancient beech trees in the UK and are amongst the most important woodland sites of their kind in Europe.
16. As with the international sites at Epping and Burham, the City Corporation protects a number of SSSIs, and has enhanced their protection through on-site management over many decades. Where possible, in two crucial respects, the City goes further in its care for such sites. We aim to establish buffers around the sites so as to protect from encroachment and our approach seeks to link sites to wider areas of nature conservation value. These measures protect the sites and ensures they do not become isolated. Examples of these additional lands include ancient wood-pastures and chalk grasslands, threatened habitats vulnerable to isolation and attritional losses from the impacts of urbanisation along their boundaries.
17. The issue of networks of open spaces is of vital importance for nature conservation and biodiversity yet is not discussed in the White Paper. While the White Paper references to environmental recovery and long-term sustainability are welcome, there are no proposals to halt and reverse the fragmentation of green spaces, the unprecedented losses of wildlife and green space. There is a danger that the division of the UK into Growth, Renewal and Protected zones could further divide and fragment wildlife sites.
18. One of the most important omissions in the White Paper is Metropolitan Open Land (MOL). MOLs are crucial to biodiversity and wellbeing in urban and suburban areas, they provide green space for leisure as well as environmental benefits. Hampstead Heath, for example, is cared for by the City of London

Corporation and is almost entirely designated as MOL. While the consultation appears to envisage the Protected category would include MOL as being within 'important areas of green space environmental and/or cultural characteristics', the lack of clarity could lead to unnecessary doubt and pose a real threat to the integrity of areas designated as MOL.

19. The consultation may be silent on MOL because of an implicit recognition that the safeguards presently associated with Green Belt apply, in broad terms, to MOL. The importance of MOL is sufficiently substantial, however, that its inclusion within the Protected designation should be specifically clarified at the earliest possible stage.
20. A further reason why it is important to identify MOL as within the scope of Protected areas is because designation as MOL is rooted in Local and Regional Plans, and has historically been a London policy designation, reflecting the importance of large open spaces within London for the provision of recreation, and nature conservation.
21. Specific MOL designation is also important to ensure protection in those instances where particular open spaces which merit protection straddle Borough boundaries (as is the case with the wider area of The Heath).
22. The importance of inclusion of MOL within the Protected designation takes on added significance when considered in the context of the proposals to change the way in which housing allocations and obligations may be configured. As explained in subsequent paragraphs, if the proposals in relation to housing were to be brought into effect, unchanged, authorities could come under substantial pressure to build on all land not specifically identified as Protected. This could cause substantial harm to local environments in urban and suburban areas.
23. Further, the lack of specific inclusion of MOL within the scope of the Protected designation leaves open a high degree of qualitative assessment of open spaces at a local level. Authorities may come under severe pressure to re-assess areas of MOL so as to release land to comply with the way in which the White Paper envisages house building obligations will be set in the future.
24. Of substantial concern to the City Corporation is the omission of reference to ancient woodlands and ancient trees outside woodlands. These, by their very nature, are irreplaceable habitats and ancient trees outside woodland are also vulnerable as they would not fit easily into framework proposed in the White Paper of strict area zoning. Care must be taken to ensure the proposed changes in this White Paper do not undermine the recent strengthening of protection afforded by the updated National Planning Policy Framework. Ancient woods and trees also require buffering by Protected land around their current boundaries.
25. The inclusion of Local Wildlife Sites (also known as SINC's) within the examples of Protected places is welcome. These sites are, however, currently non-statutory designations set out in Local Plans. Local Wildlife Sites could be at risk of development as a result of pressure on land generated by the way in which the proposals envisage house building allocations would be set in the future. The

Government should clarify what measures it will take to preserve the designation of such sites during the change from current protections to Protected area status. Consideration should be given to automatically designating Local Wildlife Sites, and similar, as Protected areas, without the need for any local re-assessment, change in designation or attribution in a Local Plan.

26. Many green spaces do not carry a statutory or nationally protected designation. Despite the lack of designation, such spaces are likely to have substantial historical importance and high value locally. Examples include gardens and greens maintained by local authorities. Certain places may be identified as having local Conservation Area status in Local Plans – but these are potentially vulnerable to being left out of the proposals in the White Paper. It is acknowledged that the consultation states that protection can be offered in the National Planning Policy Framework but, as set out under in response to ‘proposal 2’, the weight proposed to be given to NPPF remains open to doubt. At this level of planning arrangements, much needed protection would be given to gardens, greens and similar spaces, where they have no alternative safeguard, if those categories benefited from an enhanced level of protection, perhaps modelled on the statutory framework applicable to other open spaces.
27. The indication, at a ministerial level, that the housing formula would be revised to recognise existing constraints on building (such as Green Belt designation) is to be welcomed. The housing formula should be framed as guidance, so that it can be interpreted locally, rather than as a prescription. For instance, the proposals should go further and, as a minimum, factor in protections for buffer land which are protective of and adjacent to SAC and SSSI sites. This approach would be in line with the White Paper’s desire to simplify and rationalise the approach to planning. By offering authorities comprehensive guidance on development exclusions zones around SACs and SSSIs, a clear minimum standard would be established for authorities to follow.

Planning for Development

28. Allocating land to one of 3 designations (Growth, Renewal, Protected) in a central urban area such as the City of London, where there are multiple, overlapping planning, heritage and environmental designations, often on individual sites, is likely to present substantial problems. The proposed simplification of land use allocation is particularly unsuited to areas with complex heritage and other constraints. It seems likely that most urban and rural areas will face the same difficulties.
29. Applying the White Paper’s proposals to the City of London, for example, would require a site by site analysis to determine the appropriate land use designation. The City’s complex framework including 27 conservation areas, over 600 listed buildings and strategic and local views protection policies, mean that land allocation is likely to be a complex and time-consuming process. Even those parts of the City that have seen significant development in recent years, such as the City Cluster of tall buildings, have a complex pattern of heritage and other

constraints and the proposals would not be sufficiently sophisticated or flexible enough to meet the needs of such areas.

30. The greater certainty of development attached, for example, to a Growth or Renewal area designation would require a close assessment of the capacity for development and the detailed design of developments on individual sites at the Local Plan stage, which would effectively move some of the role of a private developer onto a public planning authority. Whilst this would give some certainty to developers, it would also limit their capacity for innovation in the form, layout and design of development, resulting in a more uniform character across an area. This seems to run counter to overall policy intentions as set out in the White Paper.
31. The City Corporation supports continuous improvement in planning and considers that the current discretionary approach should continue. The City takes a positive approach to planning and already works closely with developers. One example of the importance of retaining flexibility is when planning issues arise on or close to planning authority boundaries, or where a single parcel of land spans two or more authority areas. In such cases, where development in authority A's area is close to authority B's area, it may have greater consequences for the area of authority B. Only by retaining some flexibility at a local level can such complex issues be resolved. An approach that would achieve the Government's desired simplification whilst retaining local discretion would be to attach greater weight to Local Plan policies in the determination of applications and place greater emphasis on comprehensive engagement with residents, businesses and developers at the plan preparation stage.
32. The consultation does not set out any proposals about Local Plans at the level of strategic plan-making, such as the preparation of the London Plan. For example, how would a strategic plan designate Renewal or Protected Areas? Will such designations depend on local interpretation of land use and opportunities? Whilst there may be a case for strategic designation of Growth Areas, such as Old Oak Park in London, or urban extensions, the proposals do not seem to address the interaction between strategic and local designation of sites.

Proposal 2: Development management policies established at national scale and an altered role for Local Plans

33. There is a degree of overlap between national policy, strategic regional level plans such as the London Plan, and local policy. This overlap may result in duplication and might lead to confusion and dispute. Clarification of the roles and responsibilities at each level is therefore needed.
34. One feature that may require further attention is that, at present, the NPPF is a 'material consideration' but does not carry the same statutory weight as an adopted planning policy. Although not explicitly set out in the consultation document, the White Paper appears to change the status of the NPPF and make it part of the statutory policy for an area. The status of NPPF should not be changed to make it statutory. If, however, the NPPF is to be given statutory weight then amendments to the NPPF and national planning practice guidance

should be subject to a similar level of scrutiny as Local Plans, including the potential for examination in public. Without such scrutiny, the opportunity for local-level variation in response to local needs, a key feature of the current system, could be lost.

35. The concern that this proposal seeks to address could be answered without the need for fundamental reform. A possible solution would be, rather than relying upon a national set of development management policies, to simply re-state that Local Plans should not repeat national or strategic level policy.
36. A significant concern with the White Paper's proposals is that they envisage policy will be devised and set nationally. This cannot, however, reflect specific local circumstances, or the ambitions and aspirations of local people expressed through Local Plans. In any revised planning system, an option should be available for the local planning authority to reflect locally specific issues, even where these are not in alignment with national policy. Local interpretations would be subject to explanation in the Local Plan and accepted, if appropriate, by an Inspector through examination. In this regard, much of the rationale underpinning the White Paper is concerned with increasing housing supply and addressing housing shortages. It is accepted by planning inspectors and the Government that the geographical area of the City of London is a commercial centre of national and international importance, which is crucial to support UK wide economic growth. The City's exemption from national permitted development rights for the change of use of offices to residential exemplifies this commercial focus. To maintain this focus in the future, it will be important for the City Corporation to give priority to commercial office development, whilst making a contribution to meeting housing needs. This approach requires the ability to set policy locally and to not be constrained by a one-size-fits-all national policy.

Proposal 3: Local Plans should be subject to a single statutory 'sustainable development' test, replacing the existing tests of 'soundness'

37. Proposals to simplify the tests of soundness required for the Local Plan and to simplify some of the assessment processes underpinning Local Plan preparation are supported. A proposal for a mechanism for effective strategic planning across local authority boundaries is welcome. This mechanism already exists in larger urban areas, including London, where elected Mayors have responsibilities to prepare strategic planning guidance, including housing requirements. Prior to the creation of the regional assemblies, a series of joint authority working parties existed to consider cross boundary matters. These are both examples of mechanisms which can provide strategic planning. The White Paper refers to sharing of information as a means by which strategic planning can be delivered but no evidence is provided to support this view. It is unlikely that replacing the Duty to Co-operate and formal Statements of Common Ground with the sharing of information digitally will deliver effective cross boundary working or a strategic approach to planning.

38. The Sustainability Appraisal (SA) process should be retained as a key part of the local plan preparation and to provide checks to ensure that the most sustainable development options are pursued.
39. It is acknowledged that current practice in the preparation of SAs has become bureaucratic, requiring the production of long and detailed reports. A slimmed down and simplified approach which retains the essential requirements of the SA process would be welcome.
40. The reference to infrastructure planning is welcomed. This is critical to ensure that development produces high quality spaces and places for people to live and work. Greater clarity should be provided on how the proposed emphasis on data and data-driven insights would deliver improvements to the current approach to infrastructure planning. Data, on its own, does not deliver high quality outcomes, rather it is how that data is used and interpreted.

Proposal 4: A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built.

41. The Government has consulted recently on changes to the Standard Method. The City Corporation responded to this consultation and raised concerns over the way that existing stock and affordability criteria are factored into the modelling.
42. The White Paper's approach would appear to build upon the current and separate consultation for changes to the Standard Method. The combined effect would seem to produce a method that would bind local planning authorities and remove local discretion over the setting of housing targets. Greater clarity should be provided on how the methodology will incorporate other land use constraints and the need to allow for non-housing uses. It is unclear how such uses will be taken into account and what weight they will be given.
43. The lack of clarity about the methodology gives rise to a further concern about how the primacy that is attached to commercial office development in the Square Mile, which supports the UK's national economic interests, will be incorporated. As a minimum, any nationally derived targets must be susceptible to local challenge to ensure that local priorities and local needs can be properly factored into the housing need consideration. A separate consultation should be arranged on the detail of the new methodology before it is introduced, so that the impacts are properly understood.
44. The City Corporation does not support the retention of the Housing Delivery Test. This Test is a backward-looking assessment of housing delivery over a 3 year period which does not address long term future trends. For areas such as the City of London, where housing delivery fluctuates from year to year within the context of meeting targets over a longer plan period, a focus on short term delivery gives an inaccurate picture of progress in meeting housing needs.

45. In this regard, an approach based on local determination of delivery, with weight attached to the national calculation, should be taken forward. The requirement for local planning authorities to justify departure from the national calculation would be retained but would allow for legitimate local constraints to be incorporated. The retention of a 5 year land supply requirement would provide greater certainty of housing delivery. A strictly nationally set scheme, which is binding on local planning authorities, would not be helpful to housing delivery and not allow for legitimate local circumstances and variation.

Proposal 5: Areas identified as Growth Areas would automatically be granted outline planning permission for the principle of development, while automatic approvals would also be available for pre-established development types in other areas suitable for building.

46. For smaller, largely urban sites, the granting of permission in principle through the Local Plan is not considered to be appropriate. In the City of London, for example, many sites have complex and overlapping planning designations which, although they do not prevent substantial development, do have a significant impact on the scale and form of development. Furthermore, detailed issues of transportation, access, freight and servicing have a significant impact on the type and scale of development that might be accommodated. It is difficult to see how these issues could be adequately resolved at a technical stage if permission in principle has already been granted through the Local Plan.
47. The proposed approach assumes that engagement and consultation on sites will take place at the plan-making stage, removing much of the need for detailed engagement at the application stage. Again, whilst this may be appropriate for very large sites, for smaller urban infill or redevelopment it is impossible for this early stage consultation to reflect potential local impacts which may not become apparent until detailed proposals are submitted. The many examples of such impacts include the effect on daylight and sunlight, freight access and servicing considerations. The ability for local communities and elected Members to engage with development proposals at the point of application should be retained.
48. Concerns over the speed of planning and decision making and the need to provide certainty to the development industry, as expressed in the consultation, could be achieved by reform to the present planning system so as to give greater weight to Local Plan allocations. If a site is allocated for a particular form of development in a Local Plan, or an area identified as suitable for a particular form of development, then there should be a general presumption in favour of that form of development, subject to compliance with other detailed provisions of the Local Plan. This would give greater certainty to developers, whilst also allowing for local policy considerations to be considered. The advantage of this approach is that it would facilitate local community engagement - and objection where the detail of a proposal would have adverse impacts on local environment and amenity. In effect this would be a strengthening of the current policy that planning applications should be determined in accordance with Local Plan provisions.

Proposal 6: Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology

49. Moves to simplify and shorten the amount of information required to enable the determination of a planning application are welcomed. Greater standardisation of data requirements and formats and a simplification of current assessment requirements (such as for Environmental Impact Assessments) would be beneficial, subject to there being no weakening of the protections provided by such assessments.
50. The proposed 50 page limit should be replaced with an emphasis on shorter and more concise supporting statements and information. The extent of additional information required could be determined by the local planning authority on a case by case basis. The amount of information required to support an application will often reflect the scheme's complexity. The design, access, sustainability and transportation assessments needed for a 300m office tower, for example, would be vastly different from the assessment needed for a single storey extension of a commercial building. The introduction of design guides and codes will not negate the need for developers to present a range of supporting information to enable the local planning authority to be satisfied that a scheme accords with Local Plan policy in detail and does not have adverse impacts on local communities and business.
51. The consultation indicates that existing 8 or 13 week time limits will be firm deadlines. This emphasis on speed ignores the importance of high quality decision making and could result in the refusal of a development application where a decision cannot be made within the statutory deadline. If appeals became more common as a consequence, additional strain would be placed on local communities, local planning authorities and developers.
52. An approach which would achieve the White Paper's aim under this Proposal and produce a more effective result would be to give greater encouragement to the use of pre-application discussions to address concerns and objections, with formal applications submitted once outstanding issues have been resolved. This could be formalised so as to allow the developer and the local planning authority to agree a realistic timetable for progressing an application which reflects the specific circumstances of an application.
53. Whilst the proposal on time limits is not accepted, the suggestion that application fees should be returned if time limits are not met, or a decision is granted at appeal, seems likely to result in applications being determined on financial rather than planning or transportation grounds.
54. The consultation advocates the use of national standard conditions. The City Corporation has no objection to additional guidance and model conditions being set out nationally, but flexibility must be retained so as to permit adjustment of conditions to reflect local circumstances, where necessary. Greater delegation to planning authority officers should be tempered by the need for democratic oversight by elected members to be retained for larger, strategic or locally controversial schemes. The decision as to which schemes should be delegated should remain with local planning authorities and not be determined centrally. At the City Corporation, for example, delegation to officers already occurs on a large

number of applications, with only those that raise strategic concerns or where there are 4 or more objections being considered by City Members.

Proposal 7: Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new template.

55. In the broad terms of the consultation, this proposal is supported, although further information on the proposed template should be provided. Any national template should be sufficiently flexible and adaptable to reflect local circumstances and local priorities.

56. The need for plans to be accessible in a range of formats, including on a smartphone, is supported. Local Plan should be easy to read and understand and not simply based around a single pdf document online. However, digital accessibility is not the same as accessibility for all communities. There should be continuing provision for plans and consultation on plans to be available in hard copy.

Proposal 8: Local authorities and the Planning Inspectorate will be required through legislation to meet a statutory timetable for key stages of the process, and we will consider what sanctions there would be for those who fail to do so

57. The City Corporation supports the Government's ambition to speed up the process of developing and adopting a Local Plan. However, the 30 month time limit is too short a period in which to undertake meaningful community consultation and engagement, prepare policy supported by a robust evidence base, and to ensure democratic accountability through authority public committee meetings.

58. The consultation makes a separate suggestion that, where a Local Plan is at an advanced stage of preparation at the time of the passing of primary legislation, a new plan in accordance with the requirements of the revised planning system should be prepared within 42 months. This 42 month period is a more realistic timeframe for all Local Plans, along with continued encouragement to produce plans, or alternations to plans, more rapidly.

59. Delivery against the more rapid timescales set out in the consultation would ultimately rely upon sufficient resources being available within the local planning authority to prepare and progress the Local Plan. Elsewhere in the White Paper, reference is made to a reallocation of resources to other planning functions as a result of the simplification of Local Plan processes. In fact, the opposite result is probable - the delivery of a robust and sound Local Plan within the framework outlined in the White Paper would be very likely to require additional staff and financial resources.

Proposal 9: Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools

60. The City Corporation supports the continued role for neighbourhood plans within a reformed planning system but is concerned that little information and detail on the role of neighbourhood plans is provided. The potential for expanding the scope of neighbourhood plans is mentioned. If this is taken forward, this will place additional pressure on local planning authorities who have a statutory duty to support the preparation of such plans.

Proposal 10: A stronger emphasis on build out through planning

61. The Government's proposals hinge on the assertion that local planning authorities should have a wider role in delivering development beyond the granting of permission. Delivery of buildings is, however, a matter for the property development industry, not the local planning authority. The Local Government Association has published data showing that in the 10 years from 2009/10, 2,564,600 homes were granted planning permission, yet only 1,530,680 were built. Any new planning system should specifically acknowledge that local planning authorities are not responsible for property development; authorities should not be penalised if developers do not deliver the development required.
62. The suggested approach for substantial development sites reflects the findings of the Letwin Report and would assist delivery on the larger residential sites. The consultation provides no evidence, however, to support extending the proposals to larger commercial sites.

Pillar 2: planning for beautiful and sustainable places

Proposal 11: To make design expectations more visual and predictable, we will expect design guidance and codes to be prepared locally with community involvement, and ensure that codes are more binding on decisions about development

63. The emphasis on local design solutions, prepared and agreed with local communities is supported. The proposed national design guide, national model design code and the revised manual for streets could provide a framework for local decision making but should not provide an inflexible framework. National level guidance is not, in most instances, able to properly reflect specific local circumstances or the needs of local communities.

Proposal 12: To support the transition to a planning system which is more visual and rooted in local preferences and character, we will set up a body to support the delivery of provably locally-popular design codes, and propose that each authority should have a chief officer for design and place-making.

64. The proposal to create a new body to support the production of locally supported design codes is welcomed. It should be noted that an announcement was made on 22 September 2020 to take forward this proposal in advance of the close of the White Paper consultation.
65. Not all local planning authorities have the necessary resources and skills to prepare such guidance and codes. Authorities will require external support. The national design body should provide that support and not binding regulation; decisions on design guidance and codes must be taken locally.
66. The City Corporation supports the intention to require the appointment of a chief officer for design and placemaking. This will give additional weight to the work of planning departments.
67. The consultation indicates that the Government believes simplifying Local Plan processes will release resource to deliver other planning priorities. That is not a safe conclusion to draw. Many local planning authorities have limited resources to allocate to Local Plan-making. Furthermore, if proposals related to the nature of Local Plans are brought into force, the greater weight and faster timescales are likely to require more resource for Local Plan preparation, rather than less.

Proposal 13: To further embed national leadership on delivering better places, we will consider how Homes England's strategic objectives can give greater emphasis to delivering beautiful places.

68. The Government's focus is on delivering housing and this proposal, whilst welcome, will only address the housing sector, and not other key sectors of the development industry. The City Corporation expects the proposed new national design body to provide a wider range of guidance which covers all forms of development and open spaces.

Proposal 14: We intend to introduce a fast-track for beauty through changes to national policy and legislation, to incentivise and accelerate high quality development which reflects local character and preferences.

69. The City Corporation supports the principles underpinning the 'fast track for beauty' and the suggested approach based on guidance in local design guides and codes. In addition, the requirement that schemes demonstrate compliance with wider Local Plan aspirations for an area or site is to be welcomed. Clarification should be provided, however, that compliance with design guidance would not be the sole avenue for determining the acceptability of a development proposal.
70. The proposal that a masterplan and site specific design code prepared by the Local Planning authority will be required for sites within growth areas is supported. To ensure certainty, the Government should set out a requirement that these additional plans and codes are prepared alongside the Local Plan. This should, in turn, guide the timescales for Local Plan preparation, which, as explained above, should be longer than 30 months. Scrutiny of the detail in

masterplans at the Local Plan examination will be essential to deliver local community support for larger scale development.

71. The City Corporation does not support further extension of permitted development rights. Such an extension would remove the ability of a Local Planning authority to manage development and transport in an area and ensure development is compatible with local community ambitions.

Proposal 15: We intend to amend the National Planning Policy Framework to ensure that it targets those areas where a reformed planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits.

72. The principle of having clearer and simpler guidance on how the planning system can support measures to mitigate and adapt to climate change and maximise environmental benefits through development is supported. Similarly the City Corporation welcomes an enhanced role for Local Plans in ensuring development proposals support climate change mitigation and adaptation. It is important, however, that the revised system is calibrated to require development in all areas, not just Protected Areas, to deliver a net gain for the environment. Action on climate change mitigation and adaptation underpins City Corporation developments and the Government should consider emphasising this approach in all Local Planning activity.

Proposal 16: We intend to design a quicker, simpler framework for assessing environmental impacts and enhancement opportunities, that speeds up the process while protecting and enhancing the most valuable and important habitats and species in England.

73. The City Corporation supports reform to the process of SEA, SA and EIA. Although these processes have the protection and enhancement of the environment at their heart, in the City Corporation's experience they have lost focus, with an emphasis on process rather than outcome. Consideration should be given to ensuring assessments are continuous, informing the design and delivery of plans and projects, rather than a tool to demonstrate compliance at the end of a development process.

74. The City Corporation is concerned that the White Paper does not sufficiently address the way in which environmental protection and enhancement dovetails into assessments. The proposed focus on Local Plans, land zoning and removal of bureaucracy is insufficient to address the environmental matters raised in preceding paragraphs.

Proposal 17: Conserving and enhancing our historic buildings and areas in the 21st century

75. The commitment to conserving and enhancing heritage assets is welcomed. The intention to allow for sympathetic change, particularly to address climate change, is also supported, provided that measures retain an emphasis on retention of the heritage value of assets. A further consultation will be required regarding the

development of further guidance, which should involve Historic England, other heritage organisations and Local Planning authorities.

Proposal 18: To complement our planning reforms, we will facilitate ambitious improvements in the energy efficiency standards for buildings to help deliver our world-leading commitment to net-zero by 2050.

76. The City Corporation welcomes the commitment to delivering energy efficiency improvements and the national net zero target of 2050. The City Corporation, for example, has recently committed to a plan that will make the Square Mile net zero carbon-emission by 2040, 10 years earlier than the Government's goal. The City Corporation's current review of its Local Plan will ensure new developments include carbon reduction plans in their designs and encourage more sustainable buildings including green roofs and walls. In addition, the need to enhance biodiversity, and create new open and green spaces for nature and people, are important aspects of the City's approach.
77. The City Corporation is ready to work with interested parties and MHCLG on the delivery of net zero and is keen to share its experience and research to inform the delivery of national targets. Delivery of net zero should consider emissions from all sources, covering scope 1, 2 and 3 emissions.
78. The City Corporation welcomes the White Paper's recognition of the important role that the planning system can play in achieving net zero carbon through new development and refurbishment. Other than reference to the Future Homes Standard, however, the consultation provides little detail of how zero carbon can be delivered in non-housing development.
79. The consultation's reference to the potential to reassign planning resources to focus more fully on planning and building regulation enforcement is noted. The White Paper is not clear, however, whether there is an expectation that planning authorities will take on a new role of assisting in the enforcement of building regulations. The consultation does not appear to acknowledge that building regulations are a separate regulatory regime requiring different skills and expertise - it would be inappropriate to rely on planning officers to enforce these regulations.

Pillar 3: planning for infrastructure and connected places

Proposal 19: The Community Infrastructure Levy should be reformed to be charged as a fixed proportion of the development value above a threshold, with a mandatory nationally-set rate or rates and the current system of planning obligations abolished.

80. The City Corporation has operated a CIL since 2014 alongside s106 planning obligations. The Government's policy approach has worked effectively. Recent

changes to CIL, such as removing the restriction on the mixing of s106 and CIL to fund infrastructure, are likely to allow more effective infrastructure delivery in the future.

81. The approach described above should, in broad terms, be retained. The requirements for CIL and s106 in the City are well known and understood by most developers and wholesale replacement with a new system would be a retrograde step. Evolution and refinement would provide continuity and certainty. It would also enable the continued use of s106 value to deliver site-specific mitigation and non-financial mitigation such as contributions towards training and skills provision.
82. There are elements of the proposed Infrastructure Levy that could usefully be incorporated into the existing system, such as the potential to borrow against future Levy receipts and greater flexibility on how the Levy could be spent to fund necessary infrastructure, rather than wider council services. The link between development and infrastructure improvements is necessary not only to mitigate the impact of development, but also to make development acceptable to local communities.
83. Clarification should be provided on the relationship between the Levy applied at borough level in London and the Mayoral Levy. Further information is needed on the proportion of funding that could be passed to the Mayor and the Mayor's role in administering the Levy at the local level.

Proposal 20: The scope of the Infrastructure Levy could be extended to capture changes of use through permitted development rights

84. The City Corporation welcomes the intention that the Levy could be applied to schemes delivered through permitted development rights and those where there is no uplift in floorspace. This will address a gap in current CIL guidance and ensure that impacts on infrastructure delivery arising from such changes can be addressed.

Proposal 21: The reformed Infrastructure Levy should deliver affordable housing provision

85. The Infrastructure Levy would enable the provision of off-site provision of housing, which will assist the City Corporation in the provision of new affordable housing on its estates outside of the City of London. However, the potential for off-site contributions or commuted sums is already set out in national guidance and such delivery does not require amendment.
86. The White Paper refers to affordable housing, defined in its widest sense and including a range of low cost home ownership products. The housing need in the City of London is primarily for social rented housing, with even low cost home ownership out of reach of many people on the City Corporation's housing register. Clarification should be provided that White Paper's definition of affordable housing includes social rented housing and provides flexibility for local definitions to meet local needs.

Proposal 22: More freedom could be given to local authorities over how they spend the Infrastructure Levy

87. The City Corporation welcomes the intention to give greater flexibility to local authorities in the spending of the Infrastructure Levy. This flexibility should be exercised in the context of the required infrastructure plans to ensure that the infrastructure necessary to support development and local communities is delivered. The direct link between development, infrastructure and mitigation needed to allow that development to proceed, is critical to ensure local community support for development. The most effective means of achieving this link is by maintaining and continuing with the current approach to infrastructure contributions through s106 and CIL.

Proposal 23: As we develop our final proposals for this new planning system, we will develop a comprehensive resources and skills strategy for the planning sector to support the implementation of our reforms.

88. The proposals would retain an element of nationally set planning fees to offset the cost of development management, but much of the cost of Local Plan preparation and design guidance preparation would be met through the Infrastructure Levy. In areas where there is little development, where there are significant amounts of Protected space, or where the uplift in development value is insufficient to justify an Infrastructure Levy charge, the consultation does not indicate where the additional funding for Local Planning services would come from. Making planning dependent on funding from development also runs the risk that inappropriate development could be permitted to ensure continued funding, that planning decisions are made on financial grounds, or that Local Planning services are perceived as being too closely associated with the development industry to the detriment of the local community. This is a particular concern if development value uplift is funding the preparation of Local Plans which, in turn, grant permission in principle for new development.

89. Funding for Local Planning services should continue to come principally from a combination of application fees and general taxation/local authority funding to ensure retention of the independence of the planning function.

Proposal 24: We will seek to strengthen enforcement powers and sanctions

90. The White Paper's proposal to strengthen enforcement powers and sanctions to ensure that Local Plan ambitions are met is welcomed. The City Corporation does not, however, agree that the changes outlined in the White Paper will deliver spare capacity, at a planning authority level, which could be reallocated to enforcement. The revised and accelerated Local Plan process and the production of design guides and codes will, in fact, require additional resources. The City Corporation therefore considers it likely that additional public funding will be needed to deliver on the ambitions for enhanced enforcement.

Summary of Key Messages

- a. The White Paper's approach in relation to Protected land is broadly welcomed. See paragraphs 13, 25.
- b. If the proposals on land use designation are adopted, the Protected designation should be expressly extended to include other important green areas. It is important that areas such as MOL, local wildlife sites and others are referenced as being within the definition of Protected areas. Paragraphs 14-19, 25-26
- c. The scope of Protected areas is not clearly defined and should explicitly include local and national designations, including MOL and SACs. Paragraphs 18-24, 26.
- d. The Government should make provision for existing protections for green and open spaces to be automatically carried over to the proposed Protected areas, so as to avoid any attrition on such areas during the transition to the new arrangements. Paragraphs 17, 24-26.
- e. Recognition that there are constraints on the housing formula is welcomed. The formula, which should be in the form of guidance, should allow local interpretation so as to enable to creation of buffer land close to important natural sites, for example. Paragraph 27.
- f. The proposed simplified zoning system will not allow for local variation or local determination and it is difficult to see how it can be applied in a complex central urban area. Paragraphs 28-29.
- g. The proposals should be made sufficiently flexible so that local development priorities such as the concentration of commercial premises in the City and other highly concentrated business districts can be preserved. Paragraphs 29, 31, 36.
- h. The Government should clarify that the delivery of buildings is a matter for the property development industry, not of a local planning authority. Paragraphs 30, 61.
- i. The ability for local communities and elected members to engage in the development process at the point of application must be retained. Paragraph 32, 47, 54.
- j. Variation at a local level should be permitted in response to local needs. Paragraphs 34-36, 54, 63.
- k. The prioritisation of commercial development in the City's geographic area should continue. Paragraph 36.
- l. Off site provision of housing should continue to be permitted. Paragraphs 36, 85.
- m. The determination of housing targets should remain at the local level, and should specifically include protections for green space in each area, including protections where such lands span several authority areas. Paragraphs 36, 42-45.
- n. Determination of planning permission in principle is not suited to smaller development sites found mostly in urban areas. Local plans could, however, be given greater weight in relation to areas allocated for development. Paragraphs 46-48.
- o. Simplification of planning application processes is broadly welcomed, but the importance of high quality decision making requires a longer timeframe than proposed in the consultation. Paragraphs 49-53.
- p. A Local Plan cannot be produced in 30 months, a longer time frame should be proposed. In urban areas, in particular, complex and overlapping designations

make it difficult to envisage how assessment and agreement can be completed in the timescale. Paragraphs 57-59.

- q. It is unlikely that the proposed reforms will create any spare capacity at the level of a planning authority. Paragraphs 59, 67, 70, 79, 90.
- r. The Government should undertake further work to ensure environmental protection and enhancement measures dovetail into environmental assessments. Paragraphs 73-74.
- s. The proposed energy efficiency standards for buildings are welcomed and should be extended to non-housing development. The City Corporation would work with MHCLG on such a project. Paragraphs 72, 76-79.
- t. The 'fast track for beauty' and the suggested approach based on guidance in local design guides and codes are welcomed but the Government should clarify that compliance with design guidance would not be the sole avenue for determining the acceptability of a development proposal. Paragraph 63-66, 69-70.
- u. An extension of permitted development rights is not supported. Paragraph 71.
- v. The proposed land designations should be calibrated to require development to deliver a net gain for the environment. Paragraphs 72, 76-77.
- w. The Community Infrastructure Levy and s106 planning obligations work well and should be retained in broad terms. The proposed flexibility on spending Infrastructure Levy is welcomed. Paragraphs 80-85, 87

***Office of the City Remembrancer
October 2020***

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Summary of key Open Spaces media coverage: October to November 2020

Pro Landscaper	Coverage of news that London in Bloom judges have applauded a Square Mile 'rainbow' flower bed grown to honour key-workers fighting Covid-19. Chairman of the Open Spaces and City Gardens Committee Oliver Sells QC was quoted.	Trade	October 2020
Pro Landscaper	The publication reported on a new pop-up green space installed at Moor Lane. Oliver Sells QC, Chairman of the Open Spaces and City Gardens Committee, was quoted.	Trade	October 2020
<i>BBC Radio London</i> [Link unavailable]	<i>BBC Radio London</i> interviewed the Superintendent of Epping Forest on a rise in visitor numbers at the site during the COVID-19 lockdown.	National	October 2020
Evening Standard	There was coverage in the <i>Evening Standard</i> about the City Corporation's decision to temporarily close Hampstead Heath ladies' pond because of poor water quality. A City Corporation spokesperson was quoted.	National	October 2020
Ham&High	Anne Fairweather, Chair of the Hampstead Heath Management Committee, was quoted in the <i>Ham&High</i> in an article on the governance review by The Lord Lisvane.	Local	October 2020
Newham Recorder [viewable internally only]	The <i>Newham Recorder</i> reported on how West Ham Park has been recognised in the London in Bloom awards, Chairman of the West Ham Park Committee, Oliver Sells QC was quoted.	Local	October 2020
City A.M. Further coverage in Architects Journal (£), Estates Gazette , BD online , Building News and City Matters .	<i>City A.M.</i> ran a story about the winner of a design competition to transform the historic Finsbury Circus Gardens, the Square Mile's biggest green space and London's oldest public park. Chairman of the Open Spaces and City Gardens Committee Oliver Sells QC was quoted.	Trade	October 2020
Newham Recorder [Viewable internally only]	Chairman of the West Ham Park Committee Oliver Sells QC wrote about summer at the Park and celebrating this year's London in Bloom win.	Local	October 2020

<u>The Telegraph</u> Further coverage of the prosecutions in <u>The Times</u> , <u>The Metro</u> , <u>BBC London</u> , <u>Daily Mirror</u> , <u>The Sun</u> , <u>City Matters</u> and <u>the Yorkshire Post</u> .	<i>The Telegraph</i> ran a story about recent prosecutions at Epping Forest for illegal fungi foraging, and making people aware how picking mushrooms damages the forest. The Head of Conservation at Epping Forest, Jeremy Dagley, was interviewed.	National London	October 2020
<i>BBC Breakfast</i> [link unavailable] Further coverage in <u>BBC</u> .	<i>BBC Breakfast</i> [link unavailable] reported from Hampstead Heath's Parliament Hill Lido in a story on how studies with the Heath's cold water swimmers has helped new dementia research. Further coverage in <u>BBC</u> .	National	October 2020
<u>Evening Standard</u>	The <i>Evening Standard</i> quoted Hampstead Heath Management Committee Chair, Anne Fairweather, in a short diary story on new swimming charges at the Heath's Bathing Ponds.	National	October 2020
<u>Newham Recorder</u>	Chairman of the West Ham Park Committee, Oliver Sells QC, wrote in <i>Newham Recorder</i> with a message of thanks to all who care for the park.	Local	October 2020
<u>Epping Forest Guardian</u>	Coverage in <u>Epping Forest Guardian</u> on nine people being fined for illegal mushroom harvesting in Epping Forest. Chairman on the Epping Forest and Commons Committee, Graeme Doshi-Smith, was quoted.	Local	October 2020
<u>The Daily Telegraph</u>	Coverage in <i>The Daily Telegraph</i> on how Hampstead Heath's cold-water swimmers have helped new studies into dementia research.	National	October 2020
<u>Epping Forest Guardian</u>	<i>Epping Forest Guardian</i> reported on Epping Forest's retention of its Green Flag Award status, recognising it as one of the best managed open spaces in the world. Chairman of the City Corporation's Epping Forest and Commons Committee, Graeme Doshi-Smith, was quoted.	Local	October 2020
<u>Windsor Observer</u> and <u>Slough Observer</u>	<i>Windsor Observer</i> and <i>Slough Observer</i> reported on Burnham Beeches' Green Flag Award. Chairman of the City Corporation's Epping Forest and Commons Committee, Graeme Doshi-Smith, was quoted.	Local	October 2020

Newham Recorder City Matters	Coverage in <i>Newham Recorder</i> and <i>City Matters</i> about how the City Corporation's parks and green spaces were awarded Green Flag Award status. Chairman of the Open Spaces Committee, Oliver Sells QC, was quoted.	Local London	October 2020
Ham & High and The World News	Coverage in <i>Ham & High</i> and <i>The World News</i> about parks and green spaces managed by the City of London Corporation which have won Green Flag Award status. Chair of the Hampstead Heath Management Committee, Anne Fairweather, was quoted.	Local Online	October 2020
City Matters	<i>City Matters</i> reported on a survey of Hampstead Heath swimmers' overwhelmingly positive response to safety measures introduced to manage the health concerns posed by COVID-19.	London	October 2020
Camden New Journal [Viewable internally only]	Chair of the Hampstead Heath management committee Anne Fairweather was quoted in the <i>Camden New Journal</i> in an article on the governance review by The Lord Lisvane. A spokesperson for the City of London Corporation was also quoted.	Local	October 2020
Ham and High	In an opinion piece in <i>Ham and High</i> , Chair of the City Corporation's Hampstead Heath Management Committee, Anne Fairweather, reported she had written to the Government calling for outdoor sport facilities to be allowed to stay open during the second national lockdown.	Local	November 2020
Horticulture Week (£)	Chairman of the Open Spaces Committee, Oliver Sells QC, was quoted in a piece on the London Collective's a new public survey looking at the future of London's parks and green spaces.	Trade	November 2020
Ham&High	Chair of the Hampstead Heath management committee, Anne Fairweather, was quoted in an article about calls for the Government to reconsider the closure of the Hampstead Heath Bathing Ponds. The story appeared on the front page.	Local	November 2020
Horticulture Week Further coverage in Forestry Journal	<i>Horticulture Week</i> reported that City Corporation Tree Management Officer David Humphries won an award for safeguarding London's trees. Chair of the Hampstead Heath, Highgate Wood and Queen's Park Committee, Anne Fairweather was quoted. (£)	Trade	November 2020

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