

# Appendix 1. Consultation Statement – Open Spaces Strategy 2014

Name	Organisation	Comment	City Corporation Response
DP9	British Land plc	<p>Support the SPD's vision.</p> <p>Support the objective to increase the amount of open space, including through securing public access to private open space. But this needs to recognise other factors, such as security and amenity of the development and surrounding users.</p> <p>Roof space can fulfil a number of requirements, including green roofs, roof gardens, viewing platforms, but other uses, such as a restaurant, may be more appropriate.</p>	<p>Support welcomed.</p> <p>Wording has been added to Objective 3 to address security issues.</p> <p>Wording has been added to encompass amenity, recreation and catering roofs in the Green Roofs and Roof Spaces section.</p>
Jeff Hennessey	City of London Labour Party	<p>The City has successfully converted streets used by motorised traffic into areas for pedestrians and open space. The street scene enhancement programme should be highlighted in the SPD.</p> <p>What does the City have in mind for shared space? Given the reduction in traffic this could be achieved, for example, at Stoney Lane/Gravel Lane.</p>	<p>The Environmental Enhancement programme is referenced several times in the Strategy.</p> <p>The City Corporation encourages the implementation of shared space schemes in appropriate locations. Such schemes are considered at an early stage of project development.</p>
Collette Willis	Westminster City Council	Would welcome acknowledgement of open spaces in adjoining boroughs, particularly in Fig. 2, and recognition of connectivity between spaces across borough boundaries.	Data on open spaces in neighbouring boroughs is not held in a map format.
Jace Tyrrell	City Property Association	Support intention to improve the quantity and quality of open space. Quality of spaces often more important than quantity. Public realm should be a priority for CIL funds. Requirement for open space should not hinder development, especially space within buildings. Management plans are appropriately secured by conditions or s.106 agreements.	Comments welcomed.
John Scofield	City of London Archaeological Trust	The outlines of prominent Roman, medieval or Tudor buildings under open spaces should be marked out in stone paving, as in Guildhall Yard.	Wording has been included to encourage such projects in the Historic Parks and Gardens section of the Strategy.
Michael Devanny	Environment Agency	<p>Pleased with the content of the SPD. Support strategy to increase open spaces. Strategy takes account of climate change.</p> <p>Would like to see more reference to SuDS, particularly as an objective. Should include London Plan policy 5.13 and City Local Plan policy DM 18.2 on SuDS and surface water flooding.</p>	<p>Support welcomed.</p> <p>Have added references to SuDS in the suggested locations in the Strategy.</p>

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Piotr Behnke	Environment Agency	Increases in open space are a positive step. Green infrastructure should be mentioned: green roofs and walls. Open ground surface to allow infiltration of rain water.	Green walls and roofs are listed and discussed in the Strategy, as are SuDs.
Gemma Jamieson		Strategy is good.	Support welcomed.
Simon Vince	Heathrow Airport	No effect on safeguarding.	No comment.
John Taysum		<p>Beech Gardens, Barbican, are a green roof and are currently being rebuilt to stop water leaks. They are not included in the Green Roof Case Studies, but the map shows Beech Gardens, along with Thomas Moore Garden as 'amenity green space.' These anomalies should be reviewed.</p> <p>Support draft Strategy, particularly Objective 9 (improve health and wellbeing) and 3.4.25 (tranquil areas).</p>	<p>The definition of green roofs, dealing with all the types of roofs, including those at podium level, is currently being progressed as it is recognised that the current definition is not comprehensive.</p> <p>Support welcomed.</p>
Richard Hillebron		<p>Para 1.7.2: typing errors</p> <p>P.24: should include reference to PPSs.</p> <p>P.31: First green wall was in Gresham Street.</p> <p>Should mention junction of Moorgate/London Wall as a successful new open space.</p>	<p>Error amended.</p> <p>Discrepancy amended.</p> <p>Referenced Gresham Street 'stepped terrace' in the Green Roof and Roof Spaces section.</p> <p>Space has been in place for a considerable time, so not appropriate to specifically mention it.</p>
Brian Hickman	Middlesex St Residents' Association	SPD should mention the ramp removal in Artizan Street.	Development of the open space in place of the ramp has not commenced. The open space will be included in the next round of open space monitoring.
David Coleman		<p>Strategy is very inadequate response to wishes for more open space. Should be radical change of policy change to balance of developed land and open space. Should include objective to create green corridors.</p> <p>While priority is new provision in the east, Barbican open spaces will be a major challenge and need new thinking and resources.</p> <p>SPD needs to address risk of relying on private open space: how is access secured?</p>	<p>Strategy is prepared in the context of intense pressure for land from the office and commercial functions of the City.</p> <p>The Barbican Estate is preparing a plan to address future needs resulting from changes in transport infrastructure in the City and the increased emphasis on cultural activities.</p> <p>The importance of enabling public access to private spaces is recognised by the City Corporation and public access to private space is secured wherever possible.</p>

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Katharine Fletcher	English Heritage	<p>Vision and objectives should include more explicit reference to historic importance of open space. It contributes positively to appreciation of the urban landscape and historic areas. These aspects should be referred to in other parts of the SPD, including the conservation area SPDs, new open spaces in historic settings and historic churchyard.</p> <p>The SPD should recognise registered historic gardens and their enhancement.</p> <p>Greater public access to private open spaces would be positive.</p>	<p>A section has been added on historic parks and gardens in the Assessment of Need section.</p> <p>The four gardens on the English Heritage Register of Parks and Gardens are referenced in the Strategy as well as several references to the importance of historic gardens to the City.</p> <p>Public access to private space is sought wherever possible.</p>
Bill Ellson	Creekside Forum	<p>SPD fails to set out how aspirations will be achieved.</p> <p>The failings of the SPD have led to failings in respect of Fowkes Buildings, where consent has been given to gate an open space. This is identified in the Open Spaces Audit as 'primary open space', but the map is not usable. A map for each ward should be produced.</p> <p>The SPD should consist of a seven or eight pages of background and explanation of how the maps will be used to progress policy.</p> <p>Open spaces should be added to the maps that accompany reports on planning applications.</p>	<p>The Five year Action Plan demonstrating how objectives will be achieved will be put on the Corporation website. Will be separate from the Strategy to allow regular updating.</p> <p>The open spaces in Figure 2 of the Strategy are an indicative representation of existing open spaces in the City and should not be used to ascertain exact sizes and locations of spaces. The Strategy advises people to contact the Department of the Built Environment for definitive maps of the City's open spaces.</p> <p>Format of SPD will be reassessed when reviewed.</p> <p>Comment noted.</p>
Gianetta Corley	Resident	<p>Support the SPD's vision.</p> <p>Welcome identification of the Barbican Estate as a 'quiet' area.</p> <p>Welcome support for play equipment suitable for children with disabilities.</p> <p>Reference to scented gardens should be included.</p>	<p>Support welcomed.</p> <p>Support welcomed.</p> <p>Support welcomed.</p> <p>Objective 3 in the Strategy references the value of sensory plant displays, which could include scented gardens.</p>

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		<p>Welcome references to sites in the Barbican which have special importance for nature conservation.</p> <p>Welcome delivery strategies, in particular maintaining the Tree Strategy and Biodiversity Action Plan.</p>	<p>Support welcomed.</p> <p>Support welcomed.</p>
Sarah Hudson		<p>No evaluation of the success of the 2008 strategy is available. This is needed to reset the objectives and provide an achievable strategy.</p> <p>The 2008 strategy contained a five-year action plan. It would be helpful to include this. A delivery strategy was proposed and should also be included.</p> <p>The figures in the 2008 and 2014 strategies are inconsistent with regard to numbers of open spaces and trees, size of spaces, nature conservation sites, etc. These figures should be reconciled to allow evaluation of the success of the strategy.</p> <p>The 2008 strategy (P. 8) proposed a marketing/promotion strategy, but seems not to have been prepared.</p> <p>The table of green roofs and walls (p. 30) is incomplete. A survey/mapping of green roofs is contemplated and should be carried out.</p> <p>Nature conservation (p. 32, para 3.4.18) St Alphages Garden no longer exists. There are errors and inconsistency between the strategy and the BAP in the way SLINCs and SBINCs are identified. Bunhill Fields should also be included.</p>	<p>A comparative table demonstrating success in achieving the 2008 objectives is being prepared and will be available on the Corporation's website with the Five Year Action Plan.</p> <p>A Five year Action Plan demonstrating how objectives will be achieved will be put on the Corporation website. Will be separate from the Strategy to allow regular updating.</p> <p>Due to changes in survey methodologies between 2008 and 2012 it is not possible to compare exact figures. Text has been added in the executive summary of the Strategy to explain discrepancies in tree numbers.</p> <p>Individual marketing/promotion strategies are in place for all the divisions of the Open Spaces Department and can be made available on request. The marketing strategies for each division are coordinated by the Open Spaces Directorate via the Interpretation Improvement Group.</p> <p>Additional schemes have been added to the table of Green Roofs. A comprehensive mapping audit and monitoring structure is in progress.</p> <p>St. Alphages Garden refers to the ground level garden. The garden is temporarily affected by the development of Roman House. The identification of the SLINCs and SBINCs is consistent with the City of London Biodiversity Action Plan to ensure consistency.</p>

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		<p>Para 2.4.4: TCT objective for biodiversity should be included.</p> <p>The delivery of the Strategy will be carried out by the City Gardens Team and it is important that they have adequate resources, including maintenance and enhancement.</p> <p>Para 1.9: City should review restrictive covenants/by-laws that restrict, e.g. events or children's games.</p> <p>Para 1.10.3: Clarify definition of "private residential gardens".</p> <p>Para 1.11.3: Green roofs are important for biodiversity.</p> <p>Para 2.2.1: National strategies should include DEFRA pollinator strategy.</p> <p>Table 4: A distinction should be made between roof terraces and green roofs.</p> <p>Para 3.4.19: Efforts should be made to secure public access to the HAC ground.</p> <p>Para. 3.4.20: Missing wording.</p> <p>Para 3.4.22: Golden Lane play area is inaccessible.</p> <p>Para 3.4.32: Sky gardens should be regularly open to the public.</p> <p>Section 4.3: Implementation of the strategy has to be properly resourced.</p>	<p>Reference to The Community Strategy has been removed as it will expire at the end of 2014.</p> <p>City Gardens will continue to work in partnership with stakeholders and departments within the City of London to ensure that resources are secured maintenance and enhancement of our gardens. Securing S106, CIL, sponsorship, external grants for example.</p> <p>Reliant on funding becoming available to review certain Byelaws.</p> <p>Wording has been added to clarify this point in the Introductory section of the Strategy.</p> <p>The importance of green roofs for biodiversity is recognised in the Strategy.</p> <p>Text has been amended to include reference to Pollinator Strategy.</p> <p>The definition of green roofs to deal with all the types of roofs, including terraces, is currently being progressed.</p> <p>Comment noted.</p> <p>Missing wording reinstated.</p> <p>The inaccessibility of the Golden Lane play area has been flagged up as an issue.</p> <p>The Strategy encourages sky gardens to be publically accessible in the section on Green Roofs and Rood Spaces.</p> <p>As outlined in the Five year action plan, aspects of the Strategy which will be undertaken are reliant on</p>

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		<p>Para 4.3.3: Longer opening of open spaces should be a serious objective.</p> <p>Para 4.3.21: Provision for play areas is important. Space is also needed for more vigorous activities, such as skateboarding.</p> <p>Objective 5: There should be positive encouragement to plant biodiverse spaces and green roofs. Biodiversity on old walls should be recognised.</p> <p>Para 4.3.26: Additional SLINCs are needed.</p> <p>Para 4.3.32: Temporary use of development sites for open space should be encouraged.</p> <p>Para 4.3.33: a programme of activities to promote health and wellbeing should be achieved.</p> <p>Para 4.3.36: Surveys to monitor use of spaces should be adequately resourced.</p> <p>Para 4.4.5: While new spaces are desirable, funding if maintenance is also important. Private spaces should be open at weekends.</p> <p>Para 4.4.7: By-laws and covenants should be changes to allow a wider range of activities in spaces.</p>	<p>securing funding, i.e. S106, CIL, HLF, central government.</p> <p>The majority of our sites are open 24 hours a day. A few sites (mainly churchyards) are locked at the churches request to reduce antisocial behaviour and security issues.</p> <p>Comment noted.</p> <p>Wording has been added in the introductory section of the Strategy to address biodiversity on old walls.</p> <p>The Open Spaces Department will be assessing potential sites in order to designate three additional sites.</p> <p>Objective 2 in the Strategy encourages the temporary use of development sites.</p> <p>The Health and Well-being Board is working with all Corporation departments to promote health and well-being wherever feasible.</p> <p>Securing external funding and training volunteers to undertake these activities will assist with monitoring use of spaces.</p> <p>Where possible dialogue with landlords to encourage open access does take place. Activities such as Open Squares and Open Garden weekends will continue to be supported.</p> <p>As commented above.</p>