



**Environment, Food
and Rural Affairs
Committee**

Rt Hon Steve Barclay MP
Department for Environment, Food and Rural Affairs
London
By email

Tuesday 14th March 2024

Dear Secretary of State,

Urban Green Spaces inquiry

I am writing to inform you of our Committee's findings in our Urban Green Spaces inquiry. During the course of this inquiry, we received over 80 pieces of written evidence and held two oral evidence sessions with representatives from academia, environment NGOs, local authorities and Natural England. We considered a wide range of issues including the benefits of green spaces, the challenges of creating and maintaining them and the potential impact of Government initiatives.

The evidence is clear that urban green spaces are fundamentally important for improving mental and physical health, enhancing biodiversity, reducing pollution, mitigating flooding, tackling urban heat island effects and enabling access to nature. Their multifunctional benefits are estimated to generate significant savings through preventative public health measures as well as adding social and economic value to local communities. However, it is clear that these vital parts of communities are under serious threat and this letter sets out how we think Government should respond.

House of Commons
Palace of Westminster
Westminster
SW1A 0AA

efracom@parliament.uk
020 7219 1119
Social: @CommonsEFRA
www.parliament.uk/efracom

Although Defra and DLUHC clearly play leading roles in this policy area, this is a cross-departmental issue, and we would like the Government's response to this letter to represent a whole Government view. I would appreciate a response by 12 April.

Current trends and concerns

Little has improved since the 2017 Public Parks report published by the then Communities and Local Government Committee. Both the quantity and quality of urban green spaces are on the decline, continuing a trend that was evident seven years ago. While there are signs that this trend may be slowing, and examples of innovation, improvement and collaboration, urgent action is needed to make these examples the norm and reverse this national decline.

Stretched local budgets have had major implications for capital investment in and maintenance of green spaces. Increases to the revenue support grant and other one-off grants have not fundamentally addressed significant funding gaps for urban green spaces, particularly for maintenance. Insufficient local workforces have also hampered the development of local strategies that could create more green space. Despite the clear return on investment,¹ local authority officers struggle to protect or increase funding for green spaces: green infrastructure (GI) still lacks the status of other infrastructure which inhibits its ability to attract investment against the increasing costs of statutory services such as social care. These factors significantly limit Government policies aimed at increasing green cover and access to green spaces.

We believe that local authorities are best placed to make decisions about green space provision. We found, however, that there needs to be better imperatives, incentives and training, underpinned by cross-departmental strategies, to unlock investment and

¹ Natural England press release, [Natural England unveils new Green Infrastructure Framework](#), 2 February 2023 and ONS, [Urban natural capital accounts, UK: 2023](#), 7 September 2023: these official sources estimate that urban habitats and green spaces generate billions of pounds worth of health, climate change and environmental benefits each year. [Levelling Up and building back better through urban green infrastructure - an investment options appraisal](#), Vivid Economics and Barton Willmore / National Trust, June 2020: this research found that £5.5 billion central investment in urban green spaces would bring over £200 billion in benefits to disadvantaged communities. National Trust (UGS0074) believes that a £1bn Green Infrastructure Growth Fund would "deliver £50bn in value if targeted in areas of greatest need of accessible green space."

the various benefits that green spaces provide. Our proposals for how Government can encourage this are set out below.

Tackling resources and funding issues

Many local authorities want to invest in green infrastructure, despite it not being a statutory service, but the need to deliver statutory services such as social care and children's services, combined with a limited ability to raise revenues, puts local authorities in a highly challenging position. **We acknowledge local funding challenges and the limited ability of Government to increase funding in current circumstances, but urge the Government to consider ways to unlock private and public investment for public green spaces, as detailed further below. The Government should seriously consider the recommendations made by the LUHC Committee in its *Financial distress in local authorities* report, which set out how council tax and other reforms could assist.**

Biodiversity Net Gain (BNG) will provide a useful source of private finance for green spaces by requiring developers to invest in 10% biodiversity gains, although it is potentially less appropriate for urban contexts where biodiversity is already low. BNG has inspired initiatives such as "habitat banking", a way for local authorities to tap into these revenue streams, but trials of this approach are ongoing. Local authorities also often lack the capacity to take advantage of blended, private investment: one of the benefits of the Government-funded Future Parks Accelerator was that it provided resources to take advantage of a diverse range of revenue streams. **By the end of 2024, the Government should consider the findings of the Future Parks Accelerator, setting out how it will encourage innovative funding models and incentivise private investment outside of Biodiversity Net Gain.**

Public funding will continue to play a role by enabling innovative approaches to investment, acting as a catalyst for private investment and bridging gaps where private finance is unavailable. Some funding is directed towards developers to encourage

house building. **We believe that subsidies for housebuilding should be used, as much as possible, to require the creation of green spaces.**

The Government also provides one-off grants to local authorities for green spaces. These are, however, too sporadic, often fail to cover maintenance costs and involve sometimes demanding competitive application processes, meaning that some areas miss out. We understand the Government is looking to "streamline" grants but believe other Government investment models could provide greater consistency. For instance:

- The Flooding and Coastal Erosion Management investment programme provides consistent funding over a 6-year period, enabling better long-term planning. Guided by returns on investment and a partnership funding model, it channels funding to areas most in need and encourages blended finance: a similar approach for green spaces could attract more private finance or funding from other beneficiary bodies, such as the NHS.
- Environmental Land Management schemes pay landowners for maintaining ecosystem benefits, primarily in the agricultural sector. A similar scheme could support urban landowners to retrofit GI or regenerate areas with green space.

Although we do not take a view on the most appropriate investment vehicle(s), the large potential returns on investment mean that there is a strong case for a more robust and consistent funding programme. **The Government should consult with stakeholders on a new consistent funding programme, with the new initiative coming into force in the 2026-7 financial year. This funding should support investment in new spaces, maintenance costs and staff resourcing.**

As we have heard in other inquiries, some local authorities are struggling to fill vacancies for planners, financial advisors, horticulturalists and other environmental specialities, as well as to upskill existing staff. These skills are needed to make the case for investment in green spaces, develop local plans with communities, implement initiatives such as BNG and design spaces that maximise and balance different benefits. We note that jobs and skills has been a frequent theme in several other

committee inquiries, including our work on Tree Planting and Woodlands (2022) as well as Environmental Audit Committee inquiries into Green Jobs (2021) and The Role of Natural Capital in the Green Economy (2024). Knowledge and data gaps can mean that local authorities lack a clear understanding of current provision, how this affects different communities, how to evidence potential natural capital gains or the best approaches to apply. The Government and other public and third sector organisations have produced helpful guidance, design codes and mapping tools to understand green local GI and connections to other socio-economic factors, but these are either not statutory, not comprehensive enough or not sufficiently widespread in usage.

The Government urgently needs to set out its plans to tackle recruitment concerns that affect the green infrastructure sector. We also recommend that, by 2025, the Government works with industry and Natural England to create and regularly update a national repository of best practice and mapping/modelling systems to ensure that all local authorities are well equipped to upskill their staff and invest strategically and equitably in green spaces. Parts of this could be incorporated into planning guidance or an updated National Model Design Code that prioritises green infrastructure.

A national strategy for green spaces

We commend the leading role that Natural England and other organisations – such as Fields in Trust, the National Trust, the Safer Parks Consortium and many others - have provided for urban green spaces. However, Government should demonstrate clearer leadership to drive progress across the country. It does not help that responsibility for this policy area is spread across Government, so green spaces can fall through the gaps: we believe, in line with the findings of the previous CLG inquiry, that **there should be a central government organisation responsible for green infrastructure, or at the very least a Minister for Parks and a cross-government working group to fly the flag for urban green spaces.**

Better statutory targets are needed. Many urban green spaces will be within a 15-minute walk, but access and quality are likely to be uneven according to specific localities and communities. The 40% green cover ambition is helpful, but this is not mandatory, nor does it factor in the variety of benefits that green spaces can provide.

The Government should work with key stakeholders to develop and publish a more robust set of statutory targets for urban green spaces by 2025, aligned with other statutory goals under the Environment Act 2021 and incorporated into a future Environmental Improvement Plan.

This Government has introduced several welcome initiatives to improve the state of the environment including BNG, Local Nature Recovery Strategies and Natural England's Green Infrastructure Framework. A Land Use Framework is now expected in 2024, having been delayed several times. How these initiatives will interact is unclear. For example, the Government's recently published guidance for BNG requires only a 10% biodiversity gain unless there are other justifications; it's not clear if this undermines efforts such as the 30-40% green cover that the GI framework encourages. **We need clarity from the Government on how its various initiatives will interact. More information is also needed on how to apply them in an urban area, particularly Local Nature Recovery Strategies which could be a powerful way to encourage collaboration in this space. The Government should also detail out as soon as possible – ideally before the next election - alongside information on how different initiatives will contribute towards its goals and how progress will be evaluated.**

Beyond the activities of individuals and organisations looking to improve their private and public spaces, there are few national plans in place for retrofit and regeneration of pre-existing buildings and areas which could greatly benefit from green spaces. Using alternative investment vehicles could help, alongside changes to the rules for permitted development, and incorporating green infrastructure into the assessment of the environmental performance of buildings. Green belt of low quality could be opened up for development if it leads to ecological gains. Businesses that stand to benefit from climate adaptation infrastructure, such as the water and energy industry, could

be required to invest in GI. Private landowners, supported by more green finance options, could be better informed about the value of GI and the problems of installing impermeable surfaces. Defra should be championing such climate adaptation measures. **We encourage the Government to set out how it will support organisations interested in retrofitting GI; and how it will educate, incentivise or regulate to encourage the regeneration of areas in need of green space as well as the retrofitting of GI on private land.**

Elevating the status of green infrastructure

New housing development in England often lacks good quality green spaces. The drive for profit and the culture of the housebuilding sector incentivises high density builds and deprioritises engagement with local community needs; green spaces miss out as a result. Different prioritisation of green infrastructure across the country gives developers the power to “shop around” for less onerous GI requirements. Effective policy or regulation could counteract these drivers and create a level-playing field for those businesses that want to help. However, while the National Planning Policy Framework (NPPF) ensures that GI is a consideration, it needs to have at least the same status as grey infrastructure within the planning system. While the planning system does have mechanisms for protecting green spaces, these are little used and the NPPF and local plans could demand a lot more of developers when it comes to GI and community engagement. GI also needs to be higher priority for all bodies and departments that can invest in or are likely to benefit from GI – the NHS for example.

The former CLG Committee stated that stronger national guidance could emphasise the importance of developing local green space strategies jointly with other relevant bodies to raise the profile of parks. Natural England’s voluntary Green Infrastructure Framework offers another solution; many, including the Environmental Audit Committee, have called for this to be made mandatory for all local authorities. Its target-driven, collaborative system and the tools and standards it offers could tackle several of the problems identified in this inquiry and ensure that all developments contain comprehensive GI. The Government clearly sees it as an important tool to

deliver its goals, as set out in its National Adaptation Programme. Alternatively, the Government's new National Development Management Policies (NDMPs) or Local Nature Recovery Strategies could prioritise GI, at least within the planning sector.

The Government should ensure that green infrastructure is a consistently high priority across local government. It should consider all the tools at its disposal, including national guidance to local authorities, revisions to the planning system, using its new NDMPs, promoting the use of protections available within the planning system and making the new Green Infrastructure Framework mandatory.

Developers and the construction industry should also have clearer responsibilities to provide and maintain green infrastructure. This could be achieved through construction codes, particularly around sustainable drainage systems and green cooling features. Developers that also build new green spaces and infrastructure – through BNG or otherwise - should also be required to set out, in agreement with local authorities, clear long term governance arrangements so that these features are maintained well and operated for the benefit of the local community: many identified the current lack of arrangements as a major problem for some Government initiatives. This could involve putting such land into trusts to ensure that they are kept well in perpetuity. **The Government should consult on and set out a clearer set of responsibilities for green infrastructure within the developer/construction industry, to ensure a more consistent approach.**

We look forward to discussing these issues with you further on 26 March. I am copying in the Secretary of State for Levelling Up, Housing and Communities.

Yours sincerely



Rt Hon Sir Robert Goodwill MP
Chair, Environment, Food and Rural Affairs Committee