

## The Land Trust's response to Housing White Paper

### **Introduction**

The Land Trust welcomes the opportunity to put forward its views in relation to the Housing White Paper. Overall, we welcome the main purpose of the paper, as an important step forward in providing greater certainty in addressing long-term housing needs. As such we also welcome the acknowledgement in the paper that development is about “far more than just building houses” and recognises the need for, amongst other things, for “parks, playgrounds and a sustainable natural environment”.

However, we feel that the lack of any references to place making, liveability, legacy, stewardship and green infrastructure, there is a risk that the paper is so focussed on delivering housing numbers that it may fail to address critical long-term issues of sustainability and quality.

To put our response into context, the Land Trust is a national land management charity (with our Head Office in Warrington) that identifies sustainable funding solutions for managing parks and green public open spaces in perpetuity, to benefit communities.

Our business model enables us to own/manage land utilising a range of funding models to secure high quality and sustainably maintained open spaces that deliver economic, environmental and social benefits. We have ownership and/or long term management responsibility for over 2,200 hectares of land with more than 65 sites across England, and continue to grow with a current pipeline of over 3,000 additional hectares.

We believe, and our experience and research increasingly demonstrates that parks and green spaces are vital to a healthy nation, creating good quality places where people want to live, work, play and invest, and therefore support its sustainable growth. In particular, parks and green spaces:

- are vital for people's health and well-being, bringing people together, improving physical and mental health;
- play important roles in contributing to society, making areas more attractive to investment, supporting local and national economies;
- are key to ensuring our environment is resilient to the impacts of a changing climate;
- require sustainable investment, which costs less in the long term;
- are well used and highly valued by people, as evidenced by many surveys we and others have conducted (e.g. the Public Parks inquiry 2016).

Our vision is to help improve the quality of people's lives, by creating sustainable, high quality green spaces that deliver economic, environmental, educational, health and social benefits in local communities. We achieve this by working with a range of landowners and developers to provide solutions for undevelopable land / other brownfield and greenfield land, green spaces in and around new residential developments, and then procure where possible, local managing partners and rangers to deliver the day to day maintenance and management, acting as key facilitators and working with local communities to meet their needs.

For further information about the Land Trust, please visit [www.thelandtrust.org.uk](http://www.thelandtrust.org.uk)

## Initial views of the Housing White Paper

The following identifies some of the key issues which the Land Trust believes the White Paper still needs to consider:

- Currently, the paper seems to be driven by the housing numbers, rather than the quality of place – this is where we believe it important to introduce the principle of Place Making – which will help ensure that new development is taken forward in an environmentally sound and sustainable way. Many older housing areas will need complete rejuvenation over the coming decades to enable new open spaces, such as squares to be provided and a more compact form that underpins place making.
- It must also be noted that the benefits from well-maintained green spaces can only be achieved through high quality management and ensuring that the necessary structures, governance and funding mechanisms are put in place to ensure that they have a secure, sustainable long-term future. This is something specifically where we believe the Land Trust can help, especially as it complements our Place making agenda. Our own “Social Return on Investment” study for example, demonstrates that for every £1 per annum we spend on our green spaces, society benefits the equivalent of £30 per annum in health care provision<sup>1</sup>. A useful reference is Savills’ recent report on investment models for Place making<sup>2</sup>, but does not go into much detail about green infrastructure / green space. In this respect, the Land Trust would be happy to work discuss its own approach to long term investment solutions for green space.
- People should not be reliant on countryside for their recreational use, health benefits and access to nature<sup>3</sup> and rather than eroding countryside it is critical that access to such spaces is not seen as a privilege but be embedded within every new and existing urban area, in order to improve the health and wellbeing of local communities whilst making them more resilient to a changing climate and support biodiversity. This will also then help reduce reliance and pressures on the wider countryside for recreational purposes, and create opportunities for community cohesion through well maintained urban green space.
- We would like to reinforce the importance of comprehensive development, providing all facilities, including greenspace rather than piecemeal schemes, and as such, enable adoption of Garden City principles and embrace quality greenspace management through trust formats rather than burdening Councils.
- The Land Trust recognises and supports the need for more comprehensive planning system, to enable more development, but we encourage all new schemes to provide their own additional parks and open spaces rather than simply rely on other existing green spaces. We would be pleased to offer our experience and expertise in this area to support this.
- To re-emphasise, there does not seem to be much reference to Place making or “Liveable Places”. High standards of green space provision should be expected within all new developments irrespective of housing type. As such, it would be worth ensuring that Place making is incorporated into the White Paper, to ensure that the quality of place is more important than the quantity of houses.

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<sup>1</sup> <http://thelandtrust.org.uk/wp-content/uploads/2016/01/The-Value-of-our-Green-Spaces-January-2016.pdf>

<sup>2</sup> <http://pdf.euro.savills.co.uk/uk/residential---other/spotlight-the-value-of-placemaking-2016.pdf>

<sup>3</sup> Refer to the Value of our Green Spaces summary report, as an example: <http://thelandtrust.org.uk/wp-content/uploads/2016/01/The-Value-of-our-Green-Spaces-January-2016.pdf>

## Responses to specific sections / questions

### Chapter 1 – Planning for the right homes in the right places

#### 1. Do you agree with the proposals to:

- a. **make clear in the National Planning Policy Framework that the key strategic policies that each local planning authority should maintain are those set out currently at paragraph 156 of the Framework, with an additional requirement to plan for the allocations needed to deliver the area's housing requirement?**
- b. **use regulations to allow Spatial Development Strategies to allocate strategic sites, where these strategies require unanimous agreement of the members of the combined authority?**
- c. **revise the National Planning Policy Framework to tighten the definition of what evidence is required to support a 'sound' plan?**

The National Planning Policy Framework needs to make more specific references to the provision of new green space, in particular new urban green space, as it is vital that new and existing communities have access to green space not only for recreational opportunities but for their mental wellbeing, to support ecosystem services which for example, clean our air and water.

Recent research by the Universities of Edinburgh and York demonstrates the psychological benefits of the natural environment and therefore the importance of access to green spaces for an ageing population and impacts of urbanisation on mental health and wellbeing. The researchers highlight that this will have importance implications for planners.<sup>4</sup>

It seems that based on this paper – local plans will become more strategic. However, there is still a need to ensure evidence includes sustaining biodiversity, green space creation and management and ecological mitigation.

We are concerned that this paper is proposing to streamline the process so much that it will reduce the evidence required for successful plan making, which may result in increased loss of important green space (para 1.10). However, as evidence already confirms – green space is a vital element of successful design and makes a significant contribution to healthy communities.<sup>5</sup>

In addition, as more urban development arises, the link with green infrastructure provision needs to be explicit in policy, so that strategic green infrastructure is not lost, and green space is not fragmented and piecemeal.

In a region, such as the Southeast, which is becoming more urban, it is essential that the corridors and strategic green space are secured and protected for future generations. If policy does not protect, secure and incorporate vital green infrastructure and green spaces, there is a significant risk that they will be lost and result in irreversible change. This will have a seriously negative impact on place making, society, the economy and future generations.

The Government has a manifesto commitment to leave the natural environment of England in a

<sup>4</sup> <https://psychcentral.com/news/2017/04/11/green-spaces-may-benefit-aging-brain>

<sup>5</sup> <https://publichealthmatters.blog.gov.uk/2016/11/09/green-space-mental-wellbeing-and-sustainable-communities/>

better state in a generation (outlined in its 25 Year Environment Plan) and this Paper needs to ensure it is linked with this manifesto, support it and not conflict with it.

**2. What changes do you think would support more proportionate consultation and examination procedures for different types of plan and to ensure that different levels of plans work together?**

Green infrastructure is often dealt with as a supplementary part of planning guidance, but in circumstances of substantial urban growth, it needs to be incorporated into the ***core plan making*** and ***place making documents***, and be part of a golden thread that runs through the plan.

Green infrastructure / green space should be the starting point, with designs for new housing and infrastructure can fit in and around the existing green space and natural environment.

It is important to recognise the impacts that more urban develop has on existing green spaces, e.g. parks, and that plans should incorporate provision for their future funding for ongoing maintenance to cope with the extra pressure. Plans should recognise the cumulative effect of development on existing green space and a range of indicators, such as human health, which green space helps to support.

The [Natural England Green Infrastructure Guidance](#) is a useful resource for planners and we would recommend reading this, and taking measures to give green infrastructure more weight in planning policies.<sup>6</sup>

**3. Do you agree with the proposals to:**

- a. amend national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people?**

It is vital that national policy ensures that local authorities have clear policies on designing places and homes to support people with different needs, such as older and disabled people – but particularly including requirements for green infrastructure, green open spaces and the natural environment within the built environment.

To reinforce the point in response to Q1, the recent study by Edinburgh and York Universities ***Older People's Experiences of Mobility and Mood in an Urban Environment***<sup>7</sup> has found that "*participants experienced a beneficial effect of green space. Such evidence shows that urban green space has a role to play in contributing to a supportive city environment for older people through mediating the stress induced by built up settings*"

And they recommend having *routes that preference greenspaces alongside opportunities for social interactions. In addition, policy advice for urban planners needs to further promote accessible green infrastructure within the context of age friendly environments.*"

**3. Do you agree with the proposals to:**

- b. from early 2018, use a standardised approach to assessing housing requirements as the baseline for five-year housing supply calculations and monitoring housing delivery,**

<sup>6</sup> <http://publications.naturalengland.org.uk/publication/35033>

<sup>7</sup> <http://www.mdpi.com/1660-4601/14/2/151/htm>

**in the absence of an up-to-date plan?**

By using a standardised approach may mean more land is used for development and therefore not sufficient allocation of green space and the creation of new green space. If councils do not wish to adopt the standard methodology set by Government, it should be recognised that there could be valid reasons, such as the protection of established green infrastructure networks.

**In relation to section - Bringing brownfield land back into use**

The Paper aims to maximise the contribution of brownfield land as land for development. In many circumstances, this can be a good use of derelict land.

However, there should not be a blanket presumption for brownfield land, ignoring issues such as location and existing value. This should be done on a site-by-site basis that fully takes into account the environmental and social values and opportunities it might also present as managed green open space and the delivery of wider multi-functional benefits.

Brownfield land can also be extremely beneficial as green space in high density urban areas, rather than just as development, such as to help mitigate impacts from climate change.

For example, it is important to consider brownfield land as potential green open space. Whilst we recognise that in some cases, they are imperative as development sites, we also wish to highlight the need to consider each site on its own merits - as many can be of significant value to biodiversity, access, health and wellbeing and recreation, such as our site at Canvey Wick<sup>8</sup>.

In Housing Zones, it may be the case that place making and green infrastructure take second place to the delivery of numbers of housing units. The Land Trust's experience is that place making can be more regularly delivered with benefits for value uplift, where there is a sound investment and implementation plan for green infrastructure. Our Greenwich Peninsula Ecology Park is a good example of valuable new green space which has become a focus for the community, ecological hotspot and contributed to value uplift for thousands of new homes.<sup>9</sup>

**4. Do you agree with the proposals to amend the presumption in favour of sustainable development so that:**

- a. authorities are expected to have a clear strategy for maximising the use of suitable land in their areas?**

We support maximising the use of suitable land with the proviso that additional green space is provided to service it.

- b. it makes clear that identified development needs should be accommodated unless there are strong reasons for not doing so set out in the NPPF?**

- c. the list of policies which the Government regards as providing reasons to restrict development is limited to those set out currently in footnote 9 of the National Planning Policy Framework (so these are no longer presented as examples), with the addition of Ancient Woodland and aged or veteran trees?**

<sup>8</sup> <http://thelandtrust.org.uk/wp-content/uploads/2015/10/Canvey-Wick-Case-Study.pdf>

<sup>9</sup> <http://thelandtrust.org.uk/space/greenwich-ecology-park/>

**In response to Q4b and 4c**

We agree, subject to recognition given to locally important environmental assets and designations, including community assets, local parks, ecological assets, such as habitats and species and ancient woodlands, aged or veteran trees. For the latter – councils or developers should be required to make a detailed analysis as to the condition, longevity and ecological and social benefits, including public health before any consideration is given for their removal, and mitigation provided. Layouts that affect aged and veteran trees should also be subject to different options.

**In relation to section - Improving local authorities' role in land assembly and disposal**

There's a continued focus on public sector land to be used for development, with the launch of a new £45m Land Release Fund.

In response to para 1.27, we welcome the flexibility to dispose of land at less than best consideration if it helps deliver planning obligations, which includes green infrastructure.

It is vital to ensure that if land is to be released for new developments, that principles, such as Place making and green space provision policies underpin designs, so that good quality places are created and not just quantities of houses.

A large proportion of our sites is former public land – predominantly brownfield land and transformed into public green spaces. The majority have come from the Homes and Communities Agency, to be green space at the centre of land developed for housing, such as Frickley Country Park<sup>10</sup>. Whilst other sites have been created in partnership with developers, such as Wellesley Woodlands, part of Grainger's Aldershot urban extension on former MOD land<sup>11</sup>.

All of our sites can demonstrate the importance of public open green space for local communities, supporting their health and wellbeing, contributing to local economies, and making places attractive. Many developers have chosen / are choosing to develop near / adjacent to our parks because they see the value in green spaces to their developments.

**8. Do you agree with the proposals to amend the National Planning Policy Framework to:**

**e. expect local planning authorities to work with developers to encourage the sub-division of large sites?**

We believe that small sites should make a bigger pro rata contribution to GI, because of the impact of the character and quality of an established urban area. Councils should consider applying Section 106 obligations to small infill sites, including those without affordable housing contributions, into a trust model based on a commuted sum per site. The Land Trust's model is similar to this, and we would be happy to advise councils on how to set this up, as well as potential be the body which takes ownership, as it already does with over 60 sites across the country. An example of us managing a large number of small sites across a town is Warrington.<sup>12</sup>

**9. How could streamlined planning procedures support innovation and high-quality development in new garden towns and villages?**

<sup>10</sup> <http://thelandtrust.org.uk/space/frickley-country-park/>

<sup>11</sup> <http://thelandtrust.org.uk/wp-content/uploads/2015/09/Wellesley-Woodlands.pdf>

<sup>12</sup> <http://thelandtrust.org.uk/space/warrington/>

Developers will often sit on land and develop it in phases and takes a lot of time to complete. Therefore, if planning is streamlined, there could be opportunities for a fast track mechanism, which could prioritise those schemes and or developers, who wish to undertake upfront green infrastructure. The Land Trust works with a number of developers, who recognise the benefits of undertaking upfront green infrastructure, such as more attractive areas, with earlier take up of the serviced land, value uplift and faster sales.

#### **In relation to section - Green Belt land**

**10. Do you agree with the proposals to amend the National Planning Policy Framework to make clear that:**

- a. authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements?**

We believe that it is worth establishing a specific definition of "exceptional circumstances" for Green Belt.

#### **In relation to section - Strengthening neighbourhood planning and design**

This section relates to building good homes, referring to the APPG on Excellence in the Built Environment. However, it is important to ensure that this must also apply to the quality of the environment as well as the buildings.

We are surprised that no reference is given to the importance of "Place making" as a fundamental principle of good quality design. The pressure to deliver increasing numbers of housing units should not be allowed to undermine this principle which will be key to the UK's future success.

Therefore, it is important to incorporate such principles as place making for creating resilient communities, rather than focusing on the quantity of homes required and we strongly advise that local plans recognise and reflect this and update those plans adopted before NPPF 2012. There is a significant amount of research and evidence demonstrating how good quality place improves society and people's health and wellbeing.

Recent research by Shelter has identified that poor housing is a factor contributing to mental illness, which in turn puts operational and financial pressures on the NHS. For example, Doctors treating parents with depression because "they're unable to provide a nice environment for their children".<sup>13</sup> By having good quality well designed places, with access to green public open space from each house can reduce negative health impacts and as such, reduce the burdens on public health budgets. Our own research demonstrates that our own good quality green open spaces contribute over £53m per year of benefits to the health and welfare sector.<sup>14</sup>

#### **In relation to section - Using land more efficiently for development**

The paper supports increasing housing densities, and whilst this is welcome, it should also recognise the value of and access to quality green spaces as an integral element of such development. Our

<sup>13</sup> <http://www.bbc.co.uk/news/education-39631083>

<sup>14</sup> <http://thelandtrust.org.uk/wp-content/uploads/2016/01/The-Value-of-our-Green-Spaces-January-2016.pdf>

report – the Value of our Green Spaces provides evidence for how vital green spaces are to local communities and the values of these in monetary terms.<sup>15</sup>

In relation to this section, in the main section - para 1.53 – it suggests “avoiding a rigid application of open space standards if there is adequate provision in the local area”.

However, we believe that there is need for a thorough and robust assessment for establishing what is “adequate in the local area”; and whilst on this basis, it might enable a reduction in the quantity of open space, it must not cause a decrease in the quality of the open space and in particular the standards of how it is managed.

**13. Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should:**

- d. take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives in particular circumstances, such as open space provision in areas with good access to facilities nearby?**

Additional and new open space provision must be provided with new developments, and for them not to solely rely on existing open space / facilities. It is concerning that the ‘flexible approach’ directly references open space provision being an inhibiting factor and is allowing developments to not avoid provision, based on existing facilities. However, this would add extra pressure to existing facilities and reduce the quality of place, such as high density Housing Zones and other substantial increases in housing. It is vital that new housing developments are accompanied by more open space, not less.

**15. What are your views on the potential for delivering additional homes through more intensive use of existing public sector sites, or in urban locations more generally, and how this can best be supported through planning (using tools such as policy, local development orders, and permitted development rights)?**

In relation to Q.15 and section A.71, our model of securing and managing green space long term means that we work with developers and landowners, to provide new additional green space as part of place making, enabling new housing to be released.

We have numerous sites where a combination of good quality green open space design and long term management has been the catalyst for value uplift for new developments around our sites. This needs to be recognised by public sector bodies when selling off land, so that they maximise the quality, realise the uplift in land value that good quality green space can generate and attract investors and house builders, who see this commitment to an integrated community. Frickley Country Park<sup>16</sup> and Avenue Washlands<sup>17</sup> are examples of these.

**In relation to section - A new generation of new communities**

In relation to new town and villages, the Paper identifies “Garden Towns and Villages” as a priority. This is good news in helping to raise expectations and bringing forward good quality green space schemes. However these only represent a fraction of the total number of houses required (200,000 homes over the next 20-30 years compared to annual targets of up to 275,000. Therefore, this is less

<sup>15</sup> <http://thelandtrust.org.uk/wp-content/uploads/2016/01/The-Value-of-our-Green-Spaces-January-2016.pdf>

<sup>16</sup> <http://thelandtrust.org.uk/space/frickley-country-park/>

<sup>17</sup> <http://thelandtrust.org.uk/space/avenue-washlands-nature-reserve/>



than 10%.

It is vital that this does not lead to lower standards being expected elsewhere.

In particular, section A.58 relates to Garden Towns and Villages and highlights the opportunity for “bringing large-scale development forward in ways that streamline planning procedures and encourage locally led, high quality environments to be created”.

We would like to suggest that “and managed” is added to the end of this sentence. It is not only important to create high quality environments, but just like all other infrastructure, natural environments need to be managed and maintained long term, with the long term funding allocated to do this.

The UK Natural Environment Assessment has found that if the UK's ecosystems are properly cared for, they could add an extra £30bn a year to the UK's economy but if they are neglected, the economic cost would be more than £20bn a year.<sup>18</sup>

And it is the long term investment to manage environments long term which adds value. Our own 'Hidden Values' report identified that during the 6 years of managing Silverdale Country Park, the value of it (in natural capital accounting terms) increased by £2million. It was estimated to be valued at £600k as a derelict area of land and in 6 years, as a result of management and maintenance, community engagement and habitat restoration and enhancement, the site is now worth £2.6million to society.<sup>19</sup>

## Chapter 2 – Building Homes Faster

### **19. Do you agree with the proposal to amend national policy so that local planning authorities are expected to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers?**

It is not only important to include a section ensuring local authorities should set planning policies in relation to good quality digital infrastructure, but also in relation to Green infrastructure – which is just as important to quality place as digital access. Therefore, there should also be a similar approach and requirement for local authorities to set planning policies to ensure good quality green infrastructure is created and maintained and joined up beyond boundaries.

As already mentioned above, there is countless studies providing evidence for the importance of green infrastructure for a health society and economy.

### **In relation to section - Investing in our national infrastructure**

This chapter discusses the different types of infrastructure. Green infrastructure is also an important type of infrastructure, yet there is not one reference to green infrastructure in the whole Paper.

Before responding to question 20, on the National Infrastructure Commission, it is vital that the NIC includes green infrastructure in its research and therefore be able to provide recommendations which include green infrastructure as well as other types of infrastructure. It is vital that the NIC recognise the importance of green infrastructure and therefore are in a better place to recommend

<sup>18</sup> [http://www.wtwales.org/sites/default/files/green\\_infrastructure.pdf](http://www.wtwales.org/sites/default/files/green_infrastructure.pdf)

<sup>19</sup> <http://thelandtrust.org.uk/wp-content/uploads/2017/01/The-Hidden-Value-of-our-Green-Spaces-Jan-17.pdf>

solutions for it, similarly to grey infrastructure.

There is a plethora of research and evidence demonstrating the economic case for investing in green infrastructure and Wildlife Trust Wales explains how Wales is leading the way by embedding green infrastructure policies into its planning process, and planning guidelines, something which the English planning system should learn from.<sup>20</sup>

We would also like to make reference at this point to the Government's proposal for a new £2.3bn Housing Infrastructure Fund to "ensure infrastructure is provided in the right place at the right time". The focus here is on grey infrastructure and digital infrastructure – however, it is important to recognise green infrastructure and ask the question why green infrastructure is not being incorporated into this, or why there is not a similar fund to support existing and the creation of green infrastructure, which is vital for a healthy society and successful place making.

#### **In relation to section - Holding developers and local authorities to account**

This section is focused on holding developers to account for delivering new houses, with the focus on them providing information on the quantity of homes built. But again, they also need to be held to account for the quality of their houses and the legacy that they create, including how the green space / green infrastructure in and around the development will be managed and maintained long term to generate further benefits and add value.

#### **In relation to section - Sharpening local authority tools to speed up the building of homes**

Although, the intention is to speed up the planning process and overcome hurdles, it is important to ensure that the quality of decision-making and creating good quality places is not compromised, in the demand to meet housing number targets.

#### **28. Do you agree that for the purposes of introducing a housing delivery test, national guidance should make clear that:**

- a. The baseline for assessing housing delivery should be a local planning authority's annual housing requirement where this is set out in an up-to-date plan?**
- b. The baseline where no local plan is in place should be the published household projections until 2018/19, with the new standard methodology for assessing housing requirements providing the baseline thereafter?**
- c. Net annual housing additions should be used to measure housing delivery?**
- d. Delivery will be assessed over a rolling three-year period, starting with 2014/15 – 2016/17?**

In response to Q28, as a whole, it is important to have a mechanism to have upfront green infrastructure in place, so that this is not an afterthought and that successful place making is achieved.

#### **In relation to section - Boosting local authority capacity and capability to deliver**

In para 2.15 of the main Paper, there are proposals to increase the resources to Local Planning

<sup>20</sup> [http://www.wtwales.org/sites/default/files/green\\_infrastructure.pdf](http://www.wtwales.org/sites/default/files/green_infrastructure.pdf)

Authorities via higher fees and new capacity funding to develop planning departments. This is very much welcomed.

However, it is important to ensure that these resources are used to secure the full range of skills and expertise required to assess sustainability, including those of green infrastructure and long-term management as this skill set appears to have been lost or reduced from many Local Planning Authorities in recent times. We made this point in our consultation response to the House of Lords inquiry into the National Policy on the Built Environment in 2015.<sup>21</sup>

#### **Chapter 4 – Helping people now**

Our main comment in relation to this chapter as a whole is that it is imperative that by building affordable homes, this should not lead to any compromises on the quality of place / the environment. And access to good quality green open space should not just be for those who can afford it – it should be accessible for all. And in particular, in our experience, where most of our sites are within deprived communities, it is often areas of greater deprivation where green space can add the most value.

There is evidence demonstrating this, and in particular, Public Health England recognises the link and how well managed green spaces in deprived areas can improve poor quality health.<sup>22</sup>

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<sup>21</sup> <http://thelandtrust.org.uk/wp-content/uploads/2016/10/The-Land-Trust-Call-for-evidence-on-the-policy-for-BE.-5-October-2015.pdf>

<sup>22</sup> <https://www.noo.org.uk/LA/tackling/greenspace>