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London's Green Spaces What are They Worth?



London Wildlife Trust

Dr. John G. U. Adams

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Friends of the Earth

LONDON'S GREEN SPACES

WHAT ARE THEY WORTH?

A Report on
the valuation of open space taken for
road schemes by the Department of Transport

for

FRIENDS OF THE EARTH

and

THE LONDON WILDLIFE TRUST

by

DR. JOHN G.U. ADAMS

September 1989

Cover Photograph: Oxleas Wood. How much?

Summary

The Department of Transport grossly understates the value of the open space required for its road schemes in London. This helps it to justify schemes that should not be built. It also favours the routing of new roads through green corridors or along paths containing green stepping-stones.

The Department refuses to divulge the actual values that it places on open space in its cost-benefit analyses, and declines to explain why it considers this secrecy to be in the public interest. In relying on the District Valuer for its land valuations the Department is relying not on an independent arbiter but on someone who negotiates on its behalf to obtain land at the lowest possible price.

The only secure defence of London's green spaces against road schemes lies not in attaching cash prices to their aesthetic or ecological qualities, but in the development of a public consensus that they are too valuable to be sacrificed to the convenience of motorists.

London's Green Spaces: what are they worth?

Most road planners will acknowledge that it has long been their practice to route new roads through public open space whenever the opportunity presents itself. The Department of Transport reveals the main reason.

'Open space does not generally command a high market price because of restrictions as to its current and future planning use. The Department's cost-benefit analysis can only reflect monetary values.' (Department of Transport, *Town and Country Planning*, April 1989)

'Does not generally command a high price' is generally a euphemism for 'worthless'. It was made clear at the Henlys Corner Inquiry¹ that public open space without development permission usually has a market value of less than zero; this is because no profit making activity is permitted on it, and it is accompanied by expensive obligations - to cut the grass and tend the fences etc..

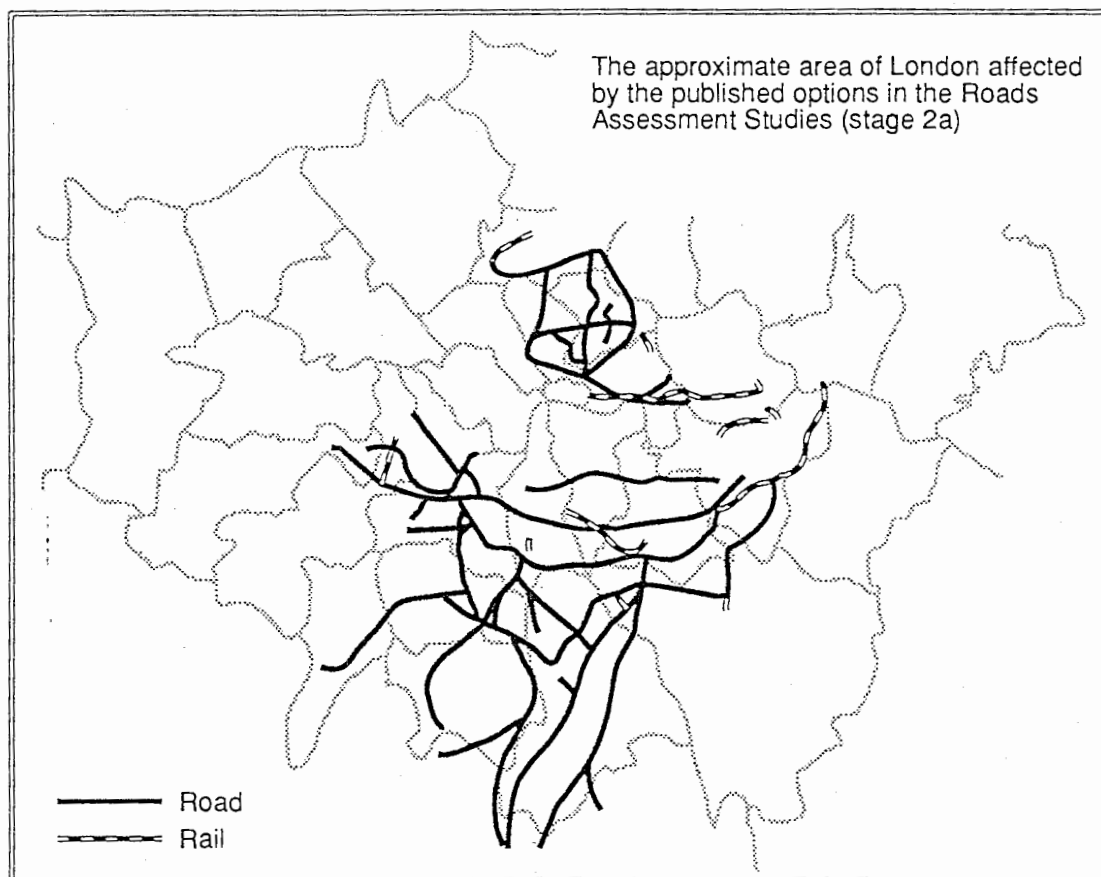
Thus from the perspective of the Department of Transport the cheapest place to build a motorway is through a public park². There are no buildings to be cleared from the route, and the land is virtually free.

¹ The inquiry held in 1988-89 into a Department of Transport scheme to put London's North Circular Road into a tunnel beneath the A1.

² or Site of Special Scientific Interest, or Area of Outstanding Natural Beauty, or farmland, or any land subject to restrictions on commercial development.

The London Assessment Studies

In July 1988 the Department of Transport published 41 different options for dealing with the transport problems which its consultants had identified in four study corridors. Map 1 illustrates the various road and rail 'options' produced by the studies.



Map 1. Source: see Appendix.

The Department's habit of treating open space as being of negligible value influences its choice of routes for new roads and railways. Appendix 1 contains a list of 194 sites of 'nature conservation interest' threatened by these options³. The bias in the choice of routes is clear. Where the route planners could not find continuous green corridors for their roads schemes, they have displayed a preference for routes with lots of green stepping stones.

Secrecy

At public inquiries and in Parliament the Department is extremely coy about

³ This is but a partial list of threatened green spaces. It does not include playing fields or conventional parks with mown grass.

the actual values that it places on the open spaces that it acquires for new roads. When Rosie Barnes MP asked the Secretary of State for Transport in Parliament what value per hectare had been placed on the land to be taken from Oxleas Wood for the East London River Crossing, he told the House of Commons (23.1.89) 'this information is not available' - meaning, of course, we know but we won't tell you. The value must have been known because it would have been required for the cost-benefit analysis to which the project had been subjected.

The principles which are supposed to guide the valuation of property to be acquired for road building are set out in the DTp's cost-benefit manual COBA. It states (2.7.2)

'When land has been purchased in advance of its use for a scheme, the value of the land may have changed either upwards or downwards in the interval. This change reflects a change in the 'opportunity cost' of the land, that is the value of the land when put to its best alternative use. Notwithstanding what has been paid for the land its current value should be debited in COBA 9 against the scheme. ... Land Costs should be entered at the District Valuers' current valuation ...'

The assumption made by the District Valuer about what this best alternative use might be will have an enormous influence on his valuation. This was demonstrated by the London Borough of Westminster when it sold three cemeteries which it considered a burden on the rates for 5 pence each; they were resold to a private off-shore company, Chelwood Holdings, for £1.2 million, and have subsequently been valued by a private property developer at £10 million (*Sunday Times*, 6.11.88).

At the public inquiry into its North Circular Road scheme at Henlys Corner in London earlier this year the DTp refused to say what value the District Valuer had placed on the parkland to be taken from the Brookside Walk. It even declined to say what assumptions about the best alternative use had been made in valuing it.

All the DTp would say was that all of the property to be taken for its scheme - residential, commercial and public open space - had been valued by the District Valuer at £5.2 million. The District Valuer declined to appear at the inquiry to explain how he had arrived at this figure on the grounds that he was negotiating on behalf of the DTp for the acquisition of this property and that any further disclosure would prejudice his negotiations.

Objectors employed a professional valuer with many years experience of negotiating with the District Valuer. He told the inquiry that

- * the District Valuer is a hard bargainer who tries to get the lowest price he can for his client, that is, he is not an independent arbiter⁴,
- * that the commercial value of public open space is zero or negative (the

⁴ He cited negotiations in which he was currently involved in which the DV had opened with an offer of £400,000, which he had subsequently raised to £750,000, and a deal remained to be struck.

- capitalized annual maintenance budget),
- * the value of a site at the junction of the A1 and the North Circular Road with permission for development as retail warehousing could be as high as £3 million per acre.

With the help of their professional valuer the objectors estimated the value of the land to be taken at £23 million - almost four and a half times more than the District Valuer's estimate. The difference they speculated (in the face of secrecy one is obliged to speculate) was accounted for by the District Valuer undervaluing the commercial and residential property in the interests of his client⁵, and valuing the public open space at about as much as Westminster got for its cemeteries.

Valuing public open space

Public open space is given more protection than ordinary residential and commercial property because it is regarded as being of special value - of greater value than ordinary property. It is made more difficult (but not impossible) for its custodians to sell it in order to ensure that they will not succumb to short term expediency, and that they will pay due regard to their duty to safeguard the land for future generations.

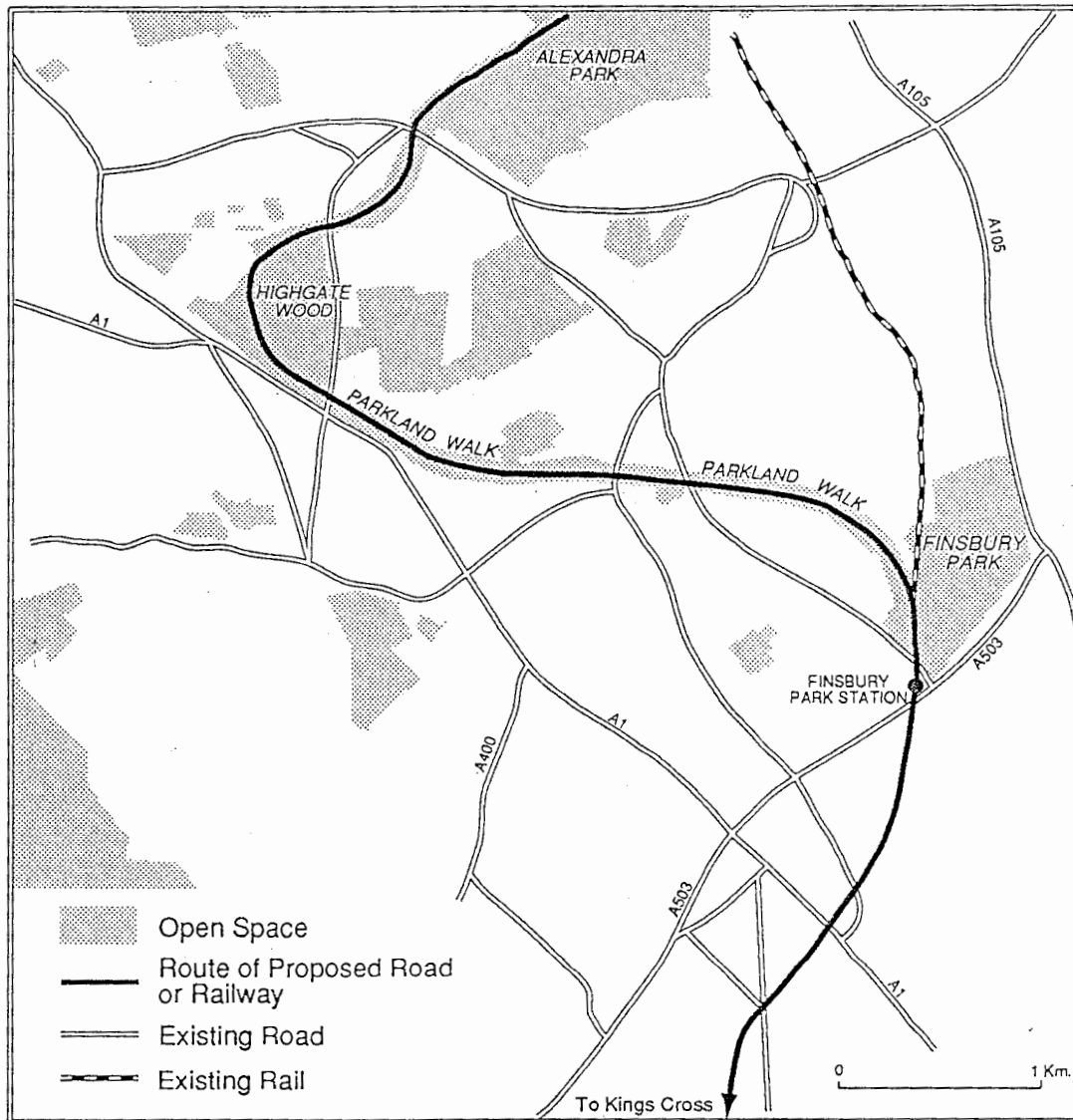
The fact that the Borough of Barnet has not previously sold the Brookside Walk for development suggests that the land is considered to be worth more to the people of Barnet as public open space than they could have got for it by selling to the highest commercial bidder. In other words the **commercial market price for the land should be considered as representing something less than its minimum value**. In many cases, it will be argued below, the commercial market price will be far less than the land's minimum value to its collective owners.

The DTp in taking a large part of the Brookside Walk for its road is, in effect, granting itself planning permission for the most environmentally destructive use imaginable - paving it over and filling it with noisy, ugly, dirty, smelly, dangerous traffic. If the people of Barnet are to be obliged to part with the land in exchange for money, the 'best alternative use' in terms of the money that would be raised would be that use which raised the largest amount of money. They are about to be compelled to part with it for virtually nothing for a use far more environmentally obnoxious than any retailing activity.

Britain's road planners habitually assume that public open space is cheap or free. Certainly this can be the only explanation for the fact that the DTp in its East London Assessment Study is currently contemplating major new roads and railways running the full length of Haringey's Parkland Walk. Map 2 shows the tortuous route followed by the various road and rail schemes following the Parkland Walk. The route makes no sense in terms of providing efficiently for known or foreseeable journey patterns. It only makes economic sense to divert

⁵ The commercial and residential property alone was estimated by the professional valuer to be worth £8 million.

the daily journeys of many tens of thousands of people from their most direct route if one assumes that the savings associated with acquisition or construction of the circuitous route outweigh the additional journey costs.



Map 2. Green corridors bias route choice.

Ten years ago when Haringey proposed to build houses on the this land the Department of Environment refused permission and insisted that it be retained as parkland; the DoE insisted, in effect, that the land was more valuable as parkland. In this part of London developers now make handsome profits by acquiring properties which they demolish in order to rebuild at higher densities. If the Parkland Walk were to be offered on the open market with planning permission for residential development it would probably be worth more than most other land in the vicinity that is already built upon because the developers would be saved the costs of demolition. If the DTp were to abide by the DoE's earlier judgement that the land was worth more than housing land, the Parkland Walk would not feature on any road-building plans. It would be

cheaper to send the bulldozers through a whole lot of houses and head straight for King's Cross.

Exchange Land

Where land to be compulsorily for a road is 'part of a common, open space, or fuel or field garden allotment' the acquisition is subject to 'special parliamentary procedure'. This procedure involves notification of the compulsory purchase order in the *London Gazette*, a 21 day period during which petitions may be presented to Parliament opposing it, and a further 21 day 'resolution period' during which either house can resolve to annul the order. This procedure need not be followed if the Secretary of State certifies that other land, not less in area and 'equally advantageous' to the public will be provided in exchange.⁶

In cases where exchange land is provided this provision should not be allowed to obscure the loss and under-valuation of open space that results from road schemes. Where the Department of Transport can find private open space to replace the public open space that it is taking for a road there will still be a loss of open space.

The private open space acquired by the Department for purposes of exchange will invariably be subject to restrictions on development which depress its price. These restrictions are to protect a public interest in that space remaining open - to preserve a cherished view perhaps, or to protect wildlife, or simply to preserve the character of an area by restricting development. Thus the price of the exchange land should not be used in a cost-benefit analysis as a surrogate for the value of the public open space taken for a road scheme. The market price of the exchange land will not reflect its true value to the wider community any better than the market value of the public open space reflects its true value. The statutory provisions for compensation for compulsory purchase, the conventions of cost benefit analysis, the Department's own COBA rule book, and common sense all dictate that it is the current value of the land which is actually to be taken which should be set against the claimed benefits of a road scheme.

'Independent' Valuation?

The DTp insists that its cost benefit analysis of road schemes ensures that 'public expenditure provides good value for money.' But the DTp refuses to tell either public inquiries or Parliament exactly how it values open space. In response to a second parliamentary question from Rosie Barnes asking the DTp to set out 'the criteria' used in valuing public open space Transport Minister Bottomley told the House of Commons (30 January 1989) 'The Department accepts the independent valuation of the District Valuer.' The District Valuer appears to treat as worthless that which local people consider the most valuable

⁶ See Davies, K. (1975) *Law of Compulsory Purchase and Compensation*, Butterworths, pp 54-56.

land of all.

Since the Henlys Corner Inquiry the Department has adopted the District valuer's defence of secrecy, maintaining that making public the price at which public open space is entered into its cost-benefit calculations 'would prejudice negotiations'.⁷ 'Negotiations' do not have interests which can be prejudiced. What the Department rightly fears would be prejudiced is its interest in the progress of its roads programme - a programme which was expanded by the roads White Paper, *Roads for Prosperity* (May 1989), to become the largest road building programme in the nation's history. The more expensive the land required for a road scheme, the more difficult that scheme becomes to justify using COBA.

The DTp asserts that the District Valuer is independent of the Department of Transport - but he negotiates on their behalf to acquire land at the best possible price. A sample of opinion amongst people professionally familiar with the work of the District Valuer reveals that 'he is notorious for undervaluing property.' The District Valuer's concern to get the best (lowest) price possible for his governmental clients is wholly admirable; but this role of guarding against public extravagance is not compatible with that of a neutral arbiter.

When two groups of public servants are negotiating terms for the transfer of public land from one public authority to another it is not obvious why the public interest would be prejudiced if the assumptions about planning permission upon which the negotiations are being conducted were to be made public. At the Henlys Corner Inquiry objectors were denied this information. It is even more difficult to understand how the public interest would be prejudiced by divulging 'agreed prices'. If prices have been agreed, negotiations must be complete. How then could they be prejudiced?

Perhaps the DTp means that its interest in future negotiations in relation to other road schemes elsewhere might be prejudiced by the public outcry that would arise if the derisory values it places on public open space became more widely known.

Monetary Values

The Department's insistence that its cost benefit analysis 'can only reflect monetary values' suggests that it is constrained to use the market value of open space in its cost-benefit analyses. Certainly their method requires the reduction of every consideration to cash, but not to free market values. When it comes to placing a cash value on the benefits of its schemes to motorists, the DTp routinely make use of hypothetical values of time savings which are not supported by the market. This emerged very clearly in the DTp's analysis of the possibility of making its East London River Crossing a tolled crossing. The analysis revealed that if motorists were to be charged, the volume of traffic using the crossing would shrink to a level that would make the scheme

⁷ *Town and Country Planning*, April 1989, p.124.

unprofitable.⁸

Every text book presenting the principles of cost benefit analysis insists that the cash value of the losses expected to result from a project should be the value that the losers would consider fair compensation. In COBA, the Department of Transport's own peculiar version of cost benefit analysis, no attempt is made to ascertain the value that people would consider fair compensation for the loss of their parks. In pleading that it is constrained by COBA to treat public open space as valueless, it is saying no more than that it chooses to treat it as valueless.

The DTp states that sections 14-21 of the 1961 Land Compensation Act provide for assumptions as to planning permission and appropriate development⁹. These sections permit the owner of property that is to be compulsorily purchased to apply to the local planning authority for a 'certificate of appropriate alternative development'. If such a certificate is granted it permits undeveloped land to be valued, for purposes of compensation, on the basis of hypothetical planning permission for development, thereby allowing the owner to lay claim to prospective development value.

In the cases of the Brookside Walk at Henlys Corner in Barnet and the Parkland Walk in Haringey the owners of the land are also the local planning authorities, with powers to designate the planning status of land within their jurisdiction. In other words they need not apply to themselves for certificates of appropriate alternative development, they can simply change the development status of the land in their development plans.

But these powers are not unfettered. In 1979 Haringey sought to designate parts of the Parkland Walk as land for residential development. They were overruled by the Secretary of State for the Environment who insisted that the land should remain as public open space. His Inspector's report stated

'The short term gains of developing the application land ... would not outweigh the value of retaining it for its open space contribution to the environment. ... It has value extending far beyond that of local interest and value that warrants special protection...'

But this ruling which, in effect stated that the land was more valuable as public open space, had the effect of reducing its market value to virtually nothing - thereby paving the way for the DTp's road planners.

In the case of the Brookside Walk the local authority (Barnet) has very different priorities. It supports the DTp road scheme. It consented to the removal of the land's protection against development and acquiesced in the most environmentally damaging form of 'development' imaginable - the road scheme. But if it had sought to get full development value for its parkland the road

⁸ Department of Transport (1982) Technical Appraisal Report on the East London River Crossing, chapter 18.

⁹ Town and Country Planning, April 1989, p.124.

scheme would almost certainly have failed to pass the COBA test of value for money. Therefore Barnet appears to have been happy to part with a burden on the rates for about as much as Westminster got for its cemeteries.

No Answer

On 5 June 1989 the editor of Town and Country Planning wrote to the Department to ask

(i) What interests would be prejudiced by the disclosure of the values assigned in COBA to public open spaces?

(ii) What is to prevent COBA reflecting the value of open space in the way suggested by Dr. Adams [i.e. valuing it with deemed development consent]?

The Department declined to answer.

The Pearce Report: a caveat

The Pearce Report, *Sustainable Development*, published in August 1989 by the Department of the Environment, argues that the principal defect of current economic arrangements and planning procedures is that they treat the environment as a 'free good', thereby encouraging the 'consumption' of more of it than would occur if people were obliged to pay the true costs entailed in its use, or misuse.

Application of the principles enunciated in the Pearce Report would require far higher values to be placed on open space than the Department currently uses when subjecting its road proposals to cost benefit analysis. This would result in a significant number of road proposals failing their cost-benefit tests. The enthusiastic reception of the Pearce Report by Christopher Patten, the Secretary of State for the Environment, greatly strengthens the argument of all those seeking to oppose Department of Transport Road schemes. However, it does not strengthen it enough.

The Pearce Report offers a worrying hostage to fortune. In advocating the placing of money values on the environment it evades crucial problems of evaluation, and in so doing paves the way for a consistent undervaluation of the environment.

Willingness to Pay

versus

Willingness to Accept Compensation

There is an intractable problem facing those who would place a cash value on the environment; its 'value' seems to depend on whether people are buying or selling. The potential environmental benefits of any project are valued, according to the conventions of cost benefit analysis, in terms of what the beneficiaries would be willing to pay for them. But according to the same

conventions, potential losses should be valued in terms of what the losers would be prepared to accept as fair compensation.

The second valuation problem, attaching cash values to the losses, presents an intractable problem. Cost benefit analysis is committed to finding surrogate prices in situations where markets do not operate. So the cost benefit analyst asks, in effect, at what price would a person sell his interest in say a park, or a view, or an endangered species, if such interests were to be freely traded? This question frequently elicits troublesome answers. If a person feels sufficiently strongly about the protection or preservation of something there is nothing to prevent him saying that it is beyond price or, in effect, of infinite value. Just one such answer will blow up a whole cost benefit analysis.

The Pearce Report evades this problem. It says

'Many things cannot be valued in money terms. That is altogether different from saying that they are "priceless" in the sense of having infinite values.'

It then proceeds to substitute **willingness to pay (WTP)** to protect something for **willingness to accept (WTA)** compensation for the loss of something. The Report presents these two concepts as interchangeable measures of the same thing, but they can produce very different answers. For example, the amount that I would be willing to pay to preserve my own life will be limited by the money that I have to spend, but the amount that I would accept as compensation for the loss of my own life is literally infinite. No amount of money will induce me to shoot myself.

The distinction between WTP and WTA is crucial. Willingness to pay cannot be separated from ability to pay. Where the willingness to pay concept is invoked, wealthy developers with schemes for wealthy clients can simply brush aside the concerns of poor objectors whose defensive abilities are constrained by their inability to pay. In a case of extreme inequality, say a confrontation between a multi-national corporation and a tribe of Amazonian Indians, the willingness to pay, in any currency recognized by the developers, on the part of the Indians to preserve their way of life is negligible. In such a case the inappropriateness of cost benefit analysis as a method of conflict resolution is manifest. It is not simply that the method is powerfully biased in favour of the wealthy; even if the 'willingness to accept' principle were to be invoked the Indians would still be incapable of expressing their estimate of fair compensation in a currency intelligible to the developers.

Wherever the poor confront the rich, and sacred meets profane, the poor and the sacred will come off second best if the contest is conducted according to the rules of cost benefit analysis.

Objective, Invariant Values

The cost benefit approach rests upon the assumption that there exists a set of implicit, invariant monetary values that can be discovered and fed into a computer which will decide the course of action that maximises the economic

benefit of society as a whole. But such values do not exist objectively 'out there' waiting to be revealed by means of some clever questionnaire survey or analysis of economic behaviour. This is obvious to anyone who has participated in a long running road inquiry. The inquiry and its attendant publicity are educational; they change people's understanding of what is at stake - and they change peoples 'values'. On a larger scale, the whole of the 'Green Debate' is currently attracting unprecedented publicity, and in so doing is transforming attitudes and the values that people place on various aspects of their lives and environments.

Corruption

Having conceded that many things cannot be valued in money terms, the Pearce Report proceeds on the assumption that everything of environmental significance must be valued in money terms in order to force people into 'a rational decision-making frame of mind.'

The equating of rationality with a willingness to put a monetary price on everything has always been a feature of the cost benefit literature. The Roskill Inquiry into London's Third Airport in 1971 remains the best known application of cost benefit analysis in Britain. It sought, by means of a questionnaire survey, to find out how much people would accept for the loss of their homes. Some 8 Per cent of those surveyed said that no amount of money could compensate them for such a loss, and a similar British Airports Authority survey recorded 38 per cent in this category¹⁰. Such answers, if accepted at face value, should require either abandoning the project or abandoning cost benefit analysis. Cost benefit analysts are loathe to do either. Instead they impugn the rationality, or honesty, of those who insist that they value some things above monetary compensation.

Pearce, commenting on this problem, observed

'These replies [of those who could not be compensated by money] would seem to be inconsistent with the general view that "each man has his price". If the response is ascribed to some element of irrationality in the respondent, the problem arises of how to treat this element in the cost benefit analysis. The procedure in the [Roskill] study was to truncate the distribution at some arbitrary level.'¹¹

The level that the Roskill Commission chose to substitute for infinity was 200 per cent above the market value of the property. In puzzling over why so many people claimed that no amount of money would compensate them the Commission speculated that perhaps some people did not answer honestly because they did not appreciate the hypothetical nature of the question and were bargaining for the highest possible price.

¹⁰ Commission on the Third Airport (1971), Report, HMSO, p. 275.

¹¹ Pearce, D.W. (1971) Cost-Benefit Analysis, Macmillan.

The pursuit by cost benefit analysts of everyman's price is corrupting. It used to be accepted that people ought to hold certain things, the most valuable things, above price. If this is less true today it is a result of the increased acceptance of the cost benefit ethic. It is an ethic that debases that which is important and disregards entirely that which is supremely important. The effect of new roads, or other projects, on cherished landscapes has sometimes been referred to by objectors as 'desecration' and 'criminally wrong.' At the time of the Roskill Inquiry Sir Colin Buchanan called the anticipated consequences of a major new London airport 'a rape of the English country-side.' To try to persuade people that they ought to consider how much money would induce them to change their minds about the sacredness of their community or the inviolability of the of the English countryside is to attempt to corrupt them.

Conclusion

It is argued by cost benefit analysts that it is necessary to put a price on the environment in order to defend it. Only by this means, they assert, can a rational case be made that will convince governments of the desirability, or even necessity, of measures to protect the environment.

But there is nothing in the method itself that ensures the protection of the environment. The Department of Transport has used cost benefit analysis over many years to justify the expenditure of billions of pounds on environmentally destructive road schemes. Its use of the method shows that by a judicious choice of the variables and prices included in the analysis the method can be used to justify whatever decision one wishes. In practice cost benefit analysis is invariably deployed at road inquiries in Britain, not to make decisions, but to justify decisions that have already been taken.¹²

The variables and prices incorporated in the analysis, including the negligible values attached to open space, reflect the values and priorities of the Department of Transport. The contortions that the Department's cost benefit analysts resort to in order to attach money values to the variables in their computer models, far from being convincing, have become a subject of ridicule and abuse at many public inquiries.

The Pearce Report contains arguments for increasing the cash value of open space to be incorporated in future cost benefit analyses of road schemes and should make it more difficult for the Department to justify some of its schemes. But the methods of cash valuation that the Report proposes would still be incapable of resolving the conflict between the advocates of more road building

¹² The COBA analysis presented to road scheme inquiries invariably incorporates very recent traffic and price information. The scheme being defended at the inquiry has usually been in the road programme for many years, and the presumption of its construction will have been incorporated in the analysis of other road schemes at other inquiries.

and the defenders of Britain's remaining green spaces.

Whether the bulldozers should be sent through an ancient woodland such as Oxleas Wood is not a question that can be decided **rationally** by putting a price on Oxleas Wood. As the Pearce Report acknowledges 'many things cannot be valued in money terms.' Oxleas Wood and all the other open spaces threatened by new roads are clearly some of these things.

The disagreement between the Department of Transport and the defenders of Oxleas Wood and other green spaces is rooted in different visions of progress. The Department lives in a mental world in which every person and every thing has a price; minutes, decibels, trees, even lives are given prices and considered freely tradable. It is a rationalistic world in which progress is a process by which the cash value of the whole of creation grows ever larger.

It is a cynical world. Oscar Wilde's cynic - a man who knows the price of everything and the value of nothing - would feel at home in this world. In 'People, Parks and the Urban Green: A Study of Popular Meanings and Values for Open Spaces in the City' (Urban Studies, 1988, 455-473) Burgess, Harrison and Limb present a detached, academic, unemotional account of the diversity of meanings and values that urban green spaces can have for those who enjoy them. The requirement of cost benefit analysis that all this richness and diversity be reduced to a simple price is not 'rational' but simplistic and misanthropic.

The opposition inhabits a less tidy world full of incommensurables. In this world there are no simple linear measures of progress. Conflicts are resolved by disputation and persuasion, not computation. It is recognised that where one side values highly what the other side considers worthless no method of calculation will be capable of settling the issue. Economistic methods which pretend to such a capability will inflame the debate by their irrelevance, not settle it.

It will sometimes be possible to defend things of ecological value with economic arguments. Oxleas Wood, the Parkland Walk and the Brookside Walk are all green spaces for which a sympathetic economist might find reasons to attribute high cash values; a 'proper' cost benefit analysis of the road schemes proposed to run through these parks would almost certainly conclude that the schemes were unjustified. But there is a danger in relying opportunistically on such a defence. Cost benefit analysis is a two edged sword. As a tool for defending things of aesthetic or ecological value but of little obvious economic importance, such as cherished views or endangered species, it is as likely as not to cut against the defender.

Some of London's green spaces might be defended from new roads by sophisticated economics - until other more profitable demands are made upon them. Their only secure defence lies in a public consensus that they are too valuable to be sacrificed to the convenience of motorists.

I would like to thank Louise Saunders for designing the cover, Barry Goldsmith for permission to use the cover photograph, and Robert Bradbrook for drawing the maps.

Appendix I

List of Sites of Nature Conservation Interest Threatened by the Published Options in the Four Stage 2a London Assessment Studies.

The information has been taken from a report by Dr Dave Dawson of the London Ecology Unit: London Road Assessment Studies and Nature Conservation. The list in the report does not include sites which are predominantly mown grass. A copy of the report can be obtained from the London Ecology Unit, Berkshire House, 168 High Holborn, WC1V 7AG.

Abandoned railway, Mitcham; Abandoned tennis courts, Lower Sydenham; Addington Hills; Avery Hill Fields; Ballards Plantation; Barn Elms Reservoirs; Barnes Common; Barnes railsides; Beckton vacant land; Beddington Sewage Works; Bell Green Gasworks site; Berthon Street Rough; Beverley Brook in Barnes; Belair Park and railsides; Beverley Brook in Raynes Park; Blackheath; Blackheath Park railsides; Blackheath railsides; Blackwall Rough; Bostall Woods; Broad Street Station railsides; Brone Street Rough; Camley Street Nature Park; Cane Hill Hospital Grounds; Cane Hill railsides; Cheam railsides; Chinbrook meadow and embankment; Chipstead Chalk Pastures; Chiswick Eyot; Chiswick railsides; Clapham Common; Clapham North Corner; Clapton railsides; Convent Grounds, Little Woodcote Wood; Oaks Park; Lower Sydenham; Collier's Wood railsides; Convent Wood; Coombe Farm; Copenhagen Junction Roughts; Copers Cope; Cosgrove Road Rough; Coulsdon Common; Coulsdon Court Wood and Betts Mead; Creek Road Wildlife Garden; Croham Hurst; Crown Lane Covered Reservoir; Crystal Palace; Depot Pond Purley; Deptford Power Station; Devilsden Wood; Dockley Road Rough; Docks Cut pasture and wasteland; Drive Park Woodcote; Dukes Hollow; Dukes Meadows railsides; Dulwich Park and surrounds; Dulwich Upper Wood and surrounds; Eltham railsides; Earl Road Wastes; Earlsfield railsides; East Putney railsides; Eltham Warren Golf Course and Nature Study Centre; Essex filterbeds; Farthing Downs; Finsbury Park railsides; Forest Hill railsides; Garford Rose Garden; Gillespie Park and adjacent railway sidings; Gipse Hill railsides; Grand Union Canal at Kings Cross; Happy Valley; Harmony Wood; Herne Hill Stadium; Highgate Wood; Hither Green Rail Triangle; Hither Green railsides; Hogsmill Valley; Kempton Park railsides; Kenley Aerodrome; Kenley Common; Knights Hill railsides; Limehouse Basin; Lloyd Park; Long Lane Wood; Loughborough Junction railsides; Lower Marvels Wood; M4 south verge Osterley; Merton Park railsides; Middlesex filterbeds; Mill Pond; Mills Path Rough; Mitcham Common; Mitcham Gasometers rough and pasture; Mitchley Wood; Morden Hall Park; Mottingham Hall Grounds; Mount Adon Open Space; New Billingsgate; New Charlton Sports Ground; New Cross Railway Cuttings; Oxleas Woodlands; Nunhead Cemetery; Nunhead rail embankments; Parkland Walk; Penfold Yard; Pentonville

railway embankment; Phippenhall Meadows; Plumstead Common; Poet's Corner; Pool River Side in New Beckenham; Purley railsides; Putney Heath; Putney Lower Common; Queen Elizabeth's Walk; Queen's Wood; Ravensbury Park; Raynes Park railsides; Reigate Road Rough; Richmond railsides; Riddlesdown; River Lee Navigation in Clapton Park; River Thames, Richmond; River Wandle and Surrounds: Summerstown and Colliers Wood; River Wandle in Earlsfield; River Wandle Sides at Phip's Bridge; Roundshaw Park; Royal Russell School; Sears Park; Selsdon railsides; Senegal Fields rail embankments; Shirley Oaks; Sidcup Road Grassland; South Norwood Rail Sides; South Norwood Sewage Farm Site; South Tottenham railsides; Spitalfields Viaduct; St John's Railway Cutting; Steatham railsides; Steatham Vale railsides; Streatham Common; Streatham Common Junction; Streatham Hill railway cutting; Streatham Road railsides; Streatham Vale Freight Depot and embankment; Stroud Green railsides; Sundridge Park; Sundridge Park railsides; Sutton Waterworks and Perrett's Field; Sydenham Hill Wood; The Drive Wood; The Glade; Therapia Lane Wasteground; The Rose and Crown Chalk Pit; The Tarn; Thornton Heath railsides; Three Kings Pond, Mitcham; Tooting Bec Common; Tooting Bec Hospital Site; Tooting Graveney Commons; Tudway Road Waste Ground; Tulse Hill rail crossing; Victoria Park; Warwick Reservoir embankments; Warwick Reservoir railsides; Walthamstow Marshes; Wandsworth Common; Wandsworth railsides; Watermeads Thames Wharf and the Limm; West Brompton Cemetery; Westcoombe Park railsides; Whitefoot Recreation Ground; Wimbledon Common; Wimbledon Park; Wimbledon to Sutton railsides in Bushy Mead; Wimbledon to West Croydon railsides, Mitcham; Woolwich Cemetery.

Friends of the Earth and the London Wildlife Trust are currently considering their detailed positions with respect to a number of the issues raised by the Pearce Report. Adams' comments on the Pearce Report in this paper are an important contribution to the debate about one of the central issues at the heart of the problem of environmental impact assessment.

Further information can be obtained from

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Extra copies can be obtained from either of the above for £3.