

LONDON ASSEMBLY

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Zack Polanski AM
Chair of the Environment Committee 2021-3

Sadiq Khan
Mayor of London
(Sent by email)

12 June 2023

Dear Sadiq,

I am writing to you as Chair of the London Environment Committee during our investigation into the management and protection of London's wild spaces. The committee recognises the work that you have done in this area as Mayor, including through the London Plan, Environment Strategy and commissioning the London Rewilding Taskforce.

In order to inform our own understanding of these issues, on 21 March 2022, the London Assembly Environment Committee visited Lee Valley Regional Park to explore the importance of ecological corridors to biodiversity. In May 2022, the Committee met to discuss London's wild spaces, the decline of wildlife, biodiversity, ecological corridors, and green infrastructure.

In the meeting, we heard from:

- Alice Roberts, Head of Green Campaigns, CPRE London
- Andrew Jones, Head of Green Infrastructure, Greater London Authority
- Bridget Fox, Regional External Director (South East), The Woodland Trust
- Mathew Frith, Director of Policy and Planning, London Wildlife Trust
- Mya-Rose Craig, Founder and President, Black2Nature
- Sam Longman, Head of Corporate Environment, Transport for London

Subsequently, the Committee have held several other meetings with expert guests on a range of topics which have also provided relevant context for this investigation. This included the Forum on London's Environmental Priorities, held on 10 January 2023 and a meeting with the Deputy Mayor for Energy and Environment on 9 March 2023.

Our investigation explored several important themes, including protecting wild spaces, improving biodiversity, supporting re-wilding, and helping Londoners access and enjoy nature. The Committee notes the conclusions and recommendations of the Rewilding Taskforce, which published its final report in March 2023, which we welcome.¹

In the light of the Taskforce's report, we do not seek to cover the specifics of re-wilding in this letter, but rather highlight broader issues that we heard during our investigation. Bridget Fox from the Woodland Trust summed it up in this way:

"The policy frameworks are there, but what we actually need to do is to close this gap and the disconnect between the policy here at City Hall and the way it is delivered on the ground. That does bring us back a lot to those issues about land use, conflicts over land use, mapping what we have and so knowing what we start with, those baselines, and then protecting it in practice as well as connecting it and getting more of it."²

In particular, she highlighted how "there are some very good policies in the London Plan, in the London Environment Strategy and in the London Urban Forest Plan and increasing interest in the London Rewilding Taskforce in improving both the protection for existing and the quality and quantity of wild spaces."³

The Committee echo this assessment but want to highlight the following three areas from our investigation.

Protecting wild spaces through planning decisions

The Committee is concerned about threats to wild spaces across London, particularly due to developments on or bordering wild spaces that affect biodiversity. One of the challenges is the number of threats to green spaces across London. CPRE London cited over 50 separate threats to green spaces across London in their March 2022 report, *Forever Green?*⁴ Alice Roberts, Head of Campaigns at CPRE London told the committee:

"I am constantly staggered by what is going on out there, and I am also constantly staggered by the fact that it is me and a bunch of residents who are trying to fight some really major problems."⁵

¹ GLA, [London Rewilding Taskforce](#)

² London Assembly Environment Committee – 26 May 2022 [London's Wild Spaces](#)

³ London Assembly Environment Committee – 26 May 2022 [London's Wild Spaces](#)

⁴ CPRE London [Nowhere safe: 50 London parks and green spaces under threat](#) March 2022

⁵ London Assembly Environment Committee – 26 May 2022 [London's Wild Spaces](#)

The current London Plan Annual Monitoring Report (AMR) includes an indicator that measures protection of SINCs (Sites of Importance for Nature Conservation).⁶ AMR17 was released in November 2022 and showed “an increase in the amount of open space affected by planning permissions granted during 2019/20 compared to 2018/19. The total of 4.773 hectares [affected] was the highest since 2015/16.”⁷ This data is lagged and backwards looking and therefore does not enable a view on current or future threats.

In the Environment Committee meeting in March 2022, Andrew Jones, Head of Green Infrastructure at the GLA said that “Very small amounts of land have actually been physically lost over that period of time. We feel that the protection policies are good. They can always be better and there are always challenges around particular cases.”⁸

Mathew Frith, Director of Policy and Planning at London Wildlife Trust, told the Committee about “the erosion of the quantity and the quality of our natural green spaces, partly through development and inappropriate planning decisions.”⁹ He explained how local authorities in London are “perhaps the most important players in nature conservation in terms of the land they own and the fact that they have a responsibility in terms of planning decisions.” However, he expressed concerns relating to the skills base in local Councils, saying “Very few local authorities in London employ an ecologist, particularly one related to planning, and there is a dearth of skills in terms of land management for nature across the country which has been referenced by the Association of Local Government Ecologists.”¹⁰

He added: “the knowledge of SINCs within the planning teams is often very meagre. We have been struggling over a number of sites in a number of boroughs where there is no recognition that these sites have a status for their value for wildlife and there is no real skill base to understand how to respond to those in terms of planning decisions.”¹¹

He suggested that there was a need for a “resource that is targeted on biodiversity planning information, particularly to those boroughs that do not have that ecological resource in their planning departments.”¹²

The Committee is concerned that a lack of trained staff and knowledge may be leading to wild spaces in London coming under threat. There is no requirement on boroughs to have funded posts for trained ecologists.

⁶ Mayor of London, MQ:2022/1960, [London Plan and Biodiversity \(1\) | London City Hall](#), June 23 2022

⁷ Mayor of London, London Plan [Annual Monitoring Report 17](#) p34

⁸ London Assembly Environment Committee – 26 May 2022 [London's Wild Spaces](#)

⁹ London Assembly Environment Committee – 26 May 2022 [London's Wild Spaces](#)

¹⁰ London Assembly Environment Committee – 26 May 2022 [London's Wild Spaces](#)

¹¹ London Assembly Environment Committee – 26 May 2022 [London's Wild Spaces](#)

¹² London Assembly Environment Committee – 26 May 2022 [London's Wild Spaces](#)

Recommendation 1: The GLA should undertake a review to explore ways to ensure that London boroughs have the skills and ecological experience needed to assess biodiversity in planning decisions to protect wild spaces and enforce the London Plan.

Improving biodiversity and access to nature

In January 2023, as part of the Committee's *Forum on London's Environmental Priorities for 2023*, Mark Cridge, Executive Director, The National Park City Foundation, said:

"Probably the biggest environmental priority and biodiversity priority that we have is recognising that, fundamentally, people are disconnected from nature. That disconnection from nature is really at the heart of the climate and biodiversity crisis because when people do not understand that they are part of nature, it is almost impossible for them to consider how they might then go on and take action to contribute towards some of the solutions that will be useful when mitigating the worst of the climate and biodiversity crisis."¹³

A range of research projects have identified that access to green space can benefit a person's health and wellbeing. In 2017, it was estimated that London's green spaces were reducing healthcare costs by approximately £950 million per year.¹⁴

The Committee welcomes the funding that the Mayor has provided for re-wilding, urban greening and improving access to nature. This is important work, and it should continue, as well as exploring how to leverage it further through the Local Nature Recovery Strategies. These funds include the Grow Back Greener Fund, which aims to help address inequalities in access to green space and prioritises projects in neighbourhoods with poor access to green space and high levels of deprivation,¹⁵ and the Rewild London Fund, awarded £850,000 to 22 projects to enhance London's most valuable wildlife sites¹⁶ - of which the GLA contributed £250,000 funding, with £600,000 coming from Amazon's Right Now Climate Fund.¹⁷

As recognised in the report by the London Green Spaces Commission in 2020, lower socio-economic groups and BAME communities derive a disproportionately high level of benefits from parks and green spaces and yet are less likely to live close to them.¹⁸ The Committee

¹³ London Assembly Environment Committee - [10 January 2023 Forum on London's Environmental Priorities in 2023](#)

¹⁴ Vivid Economics, Greater London Authority, National Trust and Heritage Lottery Fund, 2017 - [Natural Capital Accounts for public green space in London](#) p 3

¹⁵ GLA, [Grow Back Greener Fund](#), 2022

¹⁶ [Rewild London Fund 2022 | London City Hall](#)

¹⁷ [London Wildlife Trust and Mayor of London announce further plans to rewild the capital thanks to Amazon's Right Now Climate Fund | London Wildlife Trust \(wildlondon.org.uk\)](#)

¹⁸ GLA, [London Green Spaces Commission Report](#), 2020 p19

heard from Mya-Rose Craig, Founder and President of Black2Nature how “in far more working-class areas the green spaces are often far more degraded.”¹⁹

The Committee welcomes the fact that criteria for GLA funding programmes include reference to these issues. We note that the Green and Resilient Spaces Fund guidance stated that the GLA was “keen to support projects that will provide opportunities and positive outcomes for these groups and for Black, Asian and minority ethnic Londoners who are more likely to live in areas of deficiency in access to green space or in areas where green space quality is poor” and provided additional detailed guidance to applicants around actions to consider in tackling inequalities.²⁰ We also note that the Grow Back Greener Fund specifically prioritises projects where Londoners live further than a 10-minute walk from green space, in order to try and improve access to green space for these groups.²¹

In the Committee’s meeting in March 2023, Andrew Jones, Head of Infrastructure at the GLA said “in terms of long-term funding for corridors per se, I would not say we are particularly focused on that.”²² He emphasised instead that the GLA was more focused on green infrastructure and supporting biodiversity. The importance of wildlife corridors is well-recognised in the London Plan,²³ and many projects the GLA have funded are in such sites.²⁴

Since then, the Re-wilding Taskforce report has primarily focused on larger sites, defined as having a minimum size of 100 ha,²⁵ most of which are in the edge of London. The first recommendation of the report, “enable development of large-scale rewilding projects in London”, included four detailed sub-recommendations and covered 17 pages of the report, whereas the second recommendation “Rewilding ‘Stepping Stones’ and Small-Scale Projects” had no sub-recommendations and covered just three pages. There was, however, a further recommendation around “supporting activities linked to ‘stepping stone’ projects that provide “meaningful opportunities for Londoners to enhance biodiversity”.²⁶

London Wildlife Trust state there are 2 million properties with private garden space in London which are gradually moving from green to grey, but the trend on this development is unclear due to unavailability of recent data.²⁷ The Committee also heard about the importance of encouraging private actions to promote re-wilding. Matthew Frith, Director of Policy and Planning at the London Wildlife Trust, detailed in the May 2022 Environment

¹⁹ London Assembly Environment Committee – 26 May 2022 [London's Wild Spaces](#)

²⁰ GLA, [Green and Resilient Spaces Fund Round Two grants guidance](#)

²¹ [GLA, Grow Back Greener Fund](#)

²² London Assembly Environment Committee - [10 January 2023 Forum on London’s Environmental Priorities in 2023](#)

²³ GLA, [London Plan](#), 2021 Paragraph 8.4.1 states “Green spaces are especially important for improving wildlife corridors”

²⁴ GLA, [Rewild London Fund 2022](#)

²⁵ GLA, [London Rewilding Taskforce](#) p35

²⁶ GLA, [London Rewilding Taskforce](#) Report Recommendation 1 pp34-50, Recommendation 2 pp51-53, Recommendation 3.1 p57-61

²⁷ London Wildlife Trust, [London Garden City](#), 2010, p5

Committee meeting that “The Mayor has a role in terms of convincing people who do not garden to improve their gardens for biodiversity. Those who do garden know it is good for wildlife.”²⁸

Part 3 of the Rewilding Taskforce report identified recommendations for engaging the public with re-wilding, including “introducing smaller nature recovery actions that can take place closer to their doorsteps, in gardens, verges and other green and blue spaces, whether existing or newly created.”²⁹

The Committee echo the calls in the Re-wilding Taskforce report to continue to find ways to engage Londoners with nature, including funding biodiversity improvements, increasing access, and showcasing individual actions that everyone can take.

Recommendation 2: The Mayor should accept the recommendations of the Rewilding Taskforce to provide opportunities to engage with rewilding and the capital’s nature. In particular, there should be a focus on engaging and supporting people to discover and support nature where they live and enhance access for marginalised groups.

Improving data

Identification of sites and species that require protection is dependent on robust data collection which must be managed effectively and updated regularly. In 2020, the London Green Spaces Commission identified that ‘a lack of a robust evidence base’ is often a limitation to making investment decisions.³⁰

There is a need to continue to improve baseline data through Greenspace Information for Greater London (GiGL) to understand the current status of biodiversity in wild spaces across London, and to be able to measure changes as they happen. This is particularly true regarding SINCs. Research by the Campaign for the Protection of Rural England (CPRE) has “indicated there are significant inaccuracies, omissions and/or inconsistencies in data between the various data sets for London open spaces including official data used for Planning.”³¹

Mathew Frith from the London Wildlife Trust told us that the data on biodiversity in London is “probably far better than any other conurbation in the UK, but it is not enough.”³² The committee also heard that some boroughs have not undertaken reviews of their biodiversity sites for over 15 years, which means that data is out-of-date.³³

The Committee recognises the important work that the GLA is currently undertaking, such as piloting new techniques for cost-effective environmental frameworks, including working

²⁸ London Assembly Environment Committee – 26 May 2022 [London's Wild Spaces](#)

²⁹ GLA, [London Rewilding Taskforce](#) Report p63

³⁰ London Green Spaces Commission, [London Green Spaces Commission Report](#), August 19 2020 p48

³¹ Correspondence from Alice Roberts, CPRE London 7 February 2023

³² London Assembly Environment Committee – 26 May 2022 [London's Wild Spaces](#)

³³ London Assembly Environment Committee – 26 May 2022 [London's Wild Spaces](#)

with University College London on acoustics and eDNA.³⁴ GLA grants are also supporting trials of new technology-based approaches, such as water vole reintroduction on the Hogsmill River involving camera and acoustic monitoring.³⁵

Exploring actions to provide additional protection to mature trees would also be welcome. The London Environment Strategy sets a target to increase London's tree canopy cover by 10 per cent of current levels by 2050 - from 21 per cent to 23.1 per cent of London's land area.³⁶ Analysis by Forest Research indicates that carbon storage benefits, avoided stormwater runoff and air pollution removal increase steadily with trunk diameter as trees mature.³⁷

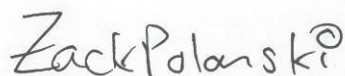
During the meeting in May 2022, Bridget Fox from the Woodland Trust also highlighted the possibility of going further than the current provision of greening in the London Plan. She suggested "to use the planning system to move beyond the 10% minimum net gain or even the very useful Urban Greening Factor and set ambitious targets for canopy cover on development sites. The Woodland Trust advocates a 30% canopy cover target, recognising that we probably need to do that to retain an average of 20% overall, and that would incentivise developers, including public sector developers, to retain mature trees onsite because mature trees count more towards canopy cover than a lot of new ones."³⁸

Recommendation 3: The GLA should use the opportunity of the Local Nature Recovery Strategies to ensure that local baseline data across London is refreshed and that all Boroughs have a strategy for producing accurate assessments of biodiversity. It should also look to strengthen further the Urban Greening Factor and Biodiversity Net Gain frameworks to ensure existing mature trees and ecosystems are appropriately valued and protected.

I look forward to working with the GLA to follow up on this work.

The Committee would welcome a response by 24 July 2023. Please address your response to Richard Clarke, Senior Policy Adviser, at Richard.Clarke@london.gov.uk.

Yours sincerely,



Zack Polanski AM
Chair of the Environment Committee 2021-3

³⁴ Correspondence from Abby Crisostomo, GLA Green Infrastructure manager, 27 February 2023

³⁵ Correspondence from Abby Crisostomo, GLA Green Infrastructure manager, 27 February 2023

³⁶ MQ 2020/3604 [Tree canopy target](#)

³⁷ Forest Research (2019) [Understanding the role of urban tree management on ecosystem services](#)

³⁸ London Assembly Environment Committee – 26 May 2022 [London's Wild Spaces](#)