# **GREATERLONDON**AUTHORITY

## **REQUEST FOR MAYORAL DECISION – MD3185**

## London's Rewilding, Nature Recovery and Evidence Programmes

## **Executive summary:**

The world faces unprecedented ecological and climate emergencies. The Green New Deal mission sets an objective to improve London's natural environment and tackle these twin emergencies, on the basis of which the London Rewilding Taskforce (the Taskforce) was established to explore opportunities to support nature recovery and enhance biodiversity in London. In March 2023, the Taskforce published its recommendations. In June 2023, the Mayor was designated by the UK government as the 'responsible authority' to develop London's statutory Local Nature Recovery Strategy (LNRS). This decision requests approval by the Mayor for funding to invest in programmes to help deliver the Taskforce's recommendations and meet these new statutory requirements.

This Mayoral Decision seeks agreement to proceed with three green infrastructure programmes:

- a rewilding programme that responds to the Taskforce's recommendations to support London in responding to the climate and ecological emergencies through the delivery of rewilding at multiple scales
- evidence collection to build the evidence for future strategy updates and monitor the progress of existing strategies, plans and policies
- projects to support the GLA's statutory duties to deliver an LNRS and support the implementation of biodiversity net gain.

The associated funding will come from income from the UK government; and from the GLA's Climate Resilience Through Nature and Inclusive Green Spaces budgets.

## **Decision:**

That the Mayor:

- approves expenditure of £1.687m in 2023-24 and 2024-25 to fund the Rewilding Programme, evidence gathering, and meeting statutory requirements; this will be taken from the Climate Resilience Through Nature and the Inclusive Green Spaces budgets
- approves receipt and expenditure of £289,807 from the Department for Environment, Food and Rural Affairs to support the preparation of a Local Nature Recovery Strategy for London and readiness for mandatory biodiversity net gain in 2023-24 and 2024-25
- delegates authority to the Executive Director for Good Growth, to approve the specific partner to
  work with, and the details of the community science rewilding engagement project, without the need
  for a further decision form; but in accordance with the GLA's Contracts and Funding Code
- approves an exemption from the GLA's Contracts and Funding Code to commission data subscription and support services from Greenspace Information for Greater London CIC services without procuring competitively.

## **Mayor of London**

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:

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Date: 19/12/23

## PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR

## **Decision required – supporting report**

## 1. Introduction and background

- 1.1. The Mayor has committed to make London a world leader in improving the environment locally and globally, taking the lead in tackling climate change; reducing pollution; developing a low-carbon economy; consuming fewer resources and using them more effectively; and ensuring all Londoners have access to a high-quality, biodiverse environment.
- 1.2. Nature recovery is critical to delivering on these commitments. The London Environment Strategy (2018) and the London Plan (2021) include policies to support this area of work. The Mayor has made more than £30m available for green space and tree-planting projects across several programmes. The Rewild London Fund alone has restored or created more than 386 hectares of priority habitat since its launch in 2021-22.
- 1.3. The Mayor convened the London Rewilding Taskforce (the Taskforce) to explore potential opportunities for rewilding in London to support nature recovery and enhance biodiversity, while bringing benefits to Londoners and addressing the climate and ecological emergency. The Taskforce met three times over 2022, and a final recommendations report was published in March 2023.<sup>1</sup> The Mayor has accepted the recommendations of the taskforce.
- 1.4. The Taskforce's three recommendations are:
  - Recommendation 1: Enable development of large-scale rewilding projects in London to support nature recovery and greater resilience of biodiversity
  - Recommendation 2: Support positive long-term management and monitoring of key Stepping Stone sites, so that their role in London's nature network and connections between large-scale rewilding sites is maximised
  - Recommendation 3: Promote opportunities for Londoners to engage with rewilding and the capital's nature to the benefit of people and wildlife.
- 1.5. In June 2023, the Mayor was appointed the 'responsible authority' for the preparation of a Local Nature Recovery Strategy (LNRS) for Greater London by the Department for Environment, Food and Rural Affairs (Defra). This makes him one of 48 such authorities nationwide. While the London Environment Strategy and the London Plan already incorporate many of its requirements, this is a new duty introduced through the Environment Act (2021) (the Act). The Act also introduced a mandatory biodiversity net gain (BNG) requirement for new developments; and new biodiversity reporting requirements for public bodies. The UK government has confirmed the GLA will receive 'additional burdens' funding to help discharge these new responsibilities.
- 1.6. Alongside the work to deliver rewilding projects and develop a nature recovery strategy, the GLA's evidence base for green infrastructure needs updating. This includes a refresh of the All London Green Grid (ALGG) (now more than a decade old); an update of green infrastructure mapping tools; an evaluation of green infrastructure programmes; and a review of key datasets.
- 1.7. Although all three projects form part of the GLA's larger, integrated green infrastructure programme, for the purpose of this decision, they are considered separately under three themes:
  - rewilding
  - evidence gathering to enable strategic green infrastructure delivery

<sup>&</sup>lt;sup>1</sup> GLA, London Rewilding Taskforce

- statutory requirements: nature recovery and BNG.
- 1.8. This MD seeks the Mayor's approval to receive and spend the following GLA and Defra budget (totalling  $\pm 1.977m$ ):
  - receive and spend a total of £289,807 from Defra's section 31 (ring-fenced) BNG funding grant allocation, and the section 31 LNRS local capacity seed funding grant allocation, to deliver the LNRS and prepare for BNG, comprising:
    - o £126,956 for 2023-24 and £111,044 for 2024-25 for the LNRS
    - o £26,807 for 2023-24 and £25,000 (indicative) for 2024-25 for BNG
  - spend a total of £0.436m approved in the 2023-24 GLA Mayoral Budget from the Climate Resilience Through Nature budget
  - spend a total of £1.251m from the 2024-25 budget (subject to budget approval) comprising:
    - o £0.785m from the Climate Resilience Through Nature budget
    - £0.466m from the Inclusive Green Space budget.
- 1.9. Details of the programmes and projects included under each theme are listed in section two. This package of work aligns with wider green infrastructure programmes and projects that have already been approved by the Mayor, such as through MD3158, which approved the third round of the Rewild London Fund.

## **Rewilding background**

- 1.10. The programme of work under the rewilding theme supports delivery of the Taskforce recommendations, following a detailed proposal from the London Wildlife Trust (LWT).
- 1.11. As part of Recommendation 1, the Taskforce identified 11 potential large-scale rewilding opportunity zones in London. The Taskforce considers these zones to offer the greatest opportunity for rewilding at significant scale (greater than 100 hectares) in London, as a starting point for further investigation and discussion.
- 1.12. The Taskforce highlighted a lack of capacity for project development as a significant barrier to establishing large-scale rewilding in London. It also noted that rewilding in urban and peri-urban areas is an emerging approach, without large existing projects from which lessons can be learnt. Consequently, recommendation 1.2 of its report was to establish and resource an expert London Rewilding Action Group (LRWAG) to identify and catalyse the development of a pilot large-scale rewilding project in one of the opportunity zones. Once established, the LRWAG would lead desk-based studies on each of the potential 11 opportunity zones, working with landowners, park departments and ecologists.
- 1.13. This Mayoral Decision (MD) proposes that a LRWAG is established and coordinated by the LWT, as the GLA's delivery partner. Building on their existing work and role leading on the inspiration around, transformation of and management of nature across London, LWT will convene other leaders on rewilding across London to join the LRWAG. The GLA will fund LWT to carry out this work. This approach aligns with the Taskforce recommendation that the 'Action Group should be led by an entity with significant experience, established connections, and influence within the sector'.
- 1.14. Further recommendations concerned improving protections for and upgrading London's Sites of Importance for Nature Conservation (SINCs) and smaller Stepping Stone sites; creating opportunities for Londoners to engage with rewilding initiatives, such as through training young people for careers in the green-jobs sector; and involving people in community initiatives to enhance biodiversity.
- 1.15. Funding to LWT is proposed for the following reasons:

- It is a well-known and respected non-profit organisation in London, with extensive links into, and experience of working with, community groups, schools, borough councils, funding bodies (such as the National Lottery Heritage Fund) and charities (such as the Natural History Museum).
- It has a long track record working on London's SINC system. This includes undertaking the London Wildlife Habitat Survey in 1984-85 that provided the baseline for today's SINCs; working with the Greater London Council, the London Ecology Unit and, subsequently, the GLA on reviewing and testing SINC criteria; and carrying out SINC reviews for several London boroughs.
- It is uniquely placed as the key expert organisation regarding nature conservation and large-scale rewilding in London. It also has existing relationships with the boroughs and SINC managers. This will avoid duplication in establishing contacts and building relationships to deliver the large-scale rewilding programme.
- It has a proven track record in engaging young people, including from underrepresented backgrounds, with the concept of rewilding; and providing them with the opportunity to develop a career within the sector. An example of this is its 'Keeping It Wild' youth training programme.
- It was represented on the Taskforce, and is already carrying out work related to the GLA's rewilding programme. This includes supporting and acting as technical adviser on the Rewild London Fund; and running the 'Keeping it Wild' traineeship programme.
- It has a wealth of existing knowledge (e.g. technical research, youth education, communications) that could be used to deliver the package of work.
- It is the only provider that can deliver at scale, and has the structure to support next steps on a large-scale rewilding pilot, ensuring value for money.

## Evidence gathering to enable strategic green infrastructure delivery background

- 1.16. The projects grouped under this theme relate to the further development of the green infrastructure evidence base for London. This will inform future policy and delivery programmes, with the aims of having at least half of London green by 2050; and increasing tree canopy cover by 10 per cent.
- 1.17. The London Plan contains several policies to enable and deliver green infrastructure across London. The application of these is underpinned by datasets that are shared through the London Datastore and the Planning Data Map; and through the suite of green infrastructure maps and tools, which have been developed by the GLA and its partners. (These include Greenspace Information for Greater London (GiGL), the capital's environmental records centre.) These datasets need regular management, maintenance and updating.
- 1.18. The 2021 London Plan also contains a new policy on greening new major developments called the Urban Greening Factor (Policy G5). For this, an external assessment of the policy's impacts is needed to understand whether and how it is being implemented; identify how to provide further support for its implementation; and identify whether adjustments will be needed for future updates to the London Plan.
- 1.19. In addition, the London Environment Strategy proposed the development of a biodiversity monitoring framework (Proposal 5.2.1.d). Some initial trials have been carried out through the CLEVER Cities project (an EU-funded programme to deliver nature-based solutions through community co-design). However, more work is needed with research institutions to investigate emerging technologies in this area, as part of developing the overall framework.

Statutory requirements - nature recovery and BNG background

1.20. LNRSs were introduced in the Act. These spatial strategies are intended to support efforts to recover nature across England. By law, each LNRS must include a statement of biodiversity priorities and a

local habitat map. These must be delivered by March 2025. For London, this will build on the London Environment Strategy and the London Plan, which already include policies on nature recovery.

- 1.21. The Mayor of London was appointed as the 'responsible authority' to produce the LNRS for London as part of the legal powers in the Act. The LNRS will build on existing strategies across London; improve our nature evidence base for the next London Plan; and inform any future updates to the London Environment Strategy and the GLA's associated delivery programmes.
- 1.22. The legal process for developing and approving the LNRS is different from London's statutory strategies under the GLA Act 1999. Approval from the London Assembly is not required.
- 1.23. The Environment Regulations 2023 require the GLA to involve its 'supporting authorities' (32 London boroughs, the City of London and Natural England) in the preparation of the LNRS. A two-stage consultation is required, with supporting authorities formally consulted on the draft strategy in stage 1, and a public consultation in stage 2. Defra specifically requires 'responsible authorities' to carry out stakeholder engagement and coordination of all the 'supporting authorities' in order to ensure their input into the LNRS. Defra also requires engagement with wider sets of stakeholders. The main output that Defra requires is refreshing and collating our spatial datasets related to nature, wildlife and nature-based solutions. Each 'supporting authority' needs to be involved in this process for compliance with the Regulations. The Defra funding does not meet all the requirements of the LNRS, which are explained in the section summarising the project's outputs (see paragraph 2.23).
- 1.24. At the point of public consultation, and at the final point of publication, the Secretary of State for the Environment, Food and Rural Affairs will weigh up whether 'supporting authorities' have been properly engaged. To minimise the risk of any objections, the GLA will chair a steering group to monitor and record engagement with the supporting authorities and key stakeholders. It will consult 'supporting authorities' early in the process, ensuring any concerns are raised promptly.
- 1.25. The concept of BNG is also included in the Act and a 10 per cent uplift/net gain in biodiversity for every eligible planning application will become mandatory from January 2024. The purpose is to prevent new development from damaging or degrading existing habitats; encourage biodiversity to be considered at the start of the design and development process; and facilitate the creation/enhancement of wildlife habitat to compensate for losses ('BNG offsetting'). The GLA's role will be to advise London boroughs/local planning authorities on strategic matters relating to BNG in London.
- 1.26. Defra is providing grant funding for responsible authorities to produce LNRSs, and for work on BNG, but has not yet announced any funding for delivery or monitoring once the strategies are completed. As a result, implementation of these strategies will need to be considered in future budgets, alongside other green infrastructure priorities.

## 2. Objectives and expected outcomes

### Objectives

- 2.1. The crisis facing the nation's biodiversity is well documented. The State of Nature report identifies a 32 per cent average decline in wildlife abundance in England since 1970. 13 per cent of species are classified as threatened with extinction, while there has been an 18 per cent decrease of invertebrate species on average since 1970.
- 2.2. Just 62 per cent of people live within 1km of green space, meaning many are cut off from easy access to nature and its multiple benefits at individual and societal levels. Londoners have the lowest access to gardens in Great Britain. Half of London's households are in areas that are deficient in access to

green space;<sup>2</sup> lower-income Londoners, and Black, Asian and other minority ethnic Londoners, are much more likely to live in these locations.

- 2.3. The Mayor has a suite of green infrastructure programmes that have so far funded around 500 projects across London to counteract these issues; tackle the ecological emergency; improve access to green space; and build the capital's climate resilience, among other benefits. The Greener City Fund supported green space projects across all 32 of London's boroughs and the City of London, improving or creating 500 hectares of green space including 180 community green space projects. The Green and Resilient Spaces Fund supports 10 large-scale projects that specifically bring benefits to areas more vulnerable to the impacts of climate change. More than 87 hectares of public green space will be improved and made more climate-resilient, and more than 100,000 new trees planted. The Grow Back Greener Fund is supporting 101 community projects to plant trees for shade and to create and improve green spaces, especially in areas of low tree-canopy cover, high climate risk or poor access to green space. The Green and Healthy Streets Fund focuses on delivering innovative and exemplar greening projects such as rain gardens and sustainable drainage systems to people's local streets. The Mayor has also funded the planting of more than half a million trees across London, with more to come through the Trees for London programme.
- 2.4. The programmes and projects detailed in this MD will be expected to further contribute to addressing these challenges and to the delivery of the objectives of the Green New Deal mission and the recommendations of the Taskforce (listed at 1.4, above). The objectives of the Green New Deal mission are to:
  - improve London's natural environment, improve air quality, and tackle the climate and ecological emergencies
  - promote and incentivise activities that sustain and grow London's green economy
  - prioritise interventions reducing health inequalities and social injustices
  - engage Londoners and businesses in the journey to become a zero-pollution and greener city.

#### Outcomes

- 2.5. The Mayor is committed to London tackling the climate and ecological emergencies and addressing inequalities in access to green space for Londoners. The programmes funded through this MD will support delivery across the following key outcomes:
  - compliance with new legal requirements for public bodies and the GLA that arise from the Act, resulting in stronger protection for green infrastructure
  - creation of an evidence base on programme impacts, enabling better decision-making about delivery of future programmes, better-targeted interventions, sustainable long-term funding and investment, and more effective business planning
  - strengthening of local ecological networks, including creating conditions for potential species (re)introductions that meet wider conservation objectives, and making them more resilient
  - biodiversity better accounted for in decision-making
  - improved funding mechanisms for green space, and coordination and targeting of green infrastructure investment
  - more space available for nature, with more opportunities for Londoners to enjoy it, including increased greening of the built environment, particularly within new developments

<sup>&</sup>lt;sup>2</sup> Defined by the London Plan as being more than 400m from a local park of at least two hectares.

- London's landowners and decision-makers supported to better plan, enhance and manage green infrastructure assets strategically to ensure London's green infrastructure network promotes multiple benefits
- support for innovative rewilding projects, including trialling and implementing new and replicable approaches, providing support for non-designated existing open/green space to achieve SINC designation status, while also enhancing and making London's SINCs more resilient to restore nature and support biodiversity through building skills and enabling better planning and management
- a strategic framework for borough green infrastructure projects, and support for increasing green skills, through strong partnerships and relationships with London's boroughs, and coordinated cross-cutting work in delivering nature-based solutions
- help for addressing the unequal impacts of climate change on diverse communities, and support for activities that enable underrepresented communities to better access and actively participate in managing important wildlife sites, thereby accelerating the pace at which they are represented in the green-jobs sector.

#### **Outputs**

## LRWAG; SINCs and Stepping Stones; and youth and community engagement

- 2.6. The £0.76m programme of work under the rewilding theme is made up of four projects: an LRWAG to catalyse large-scale rewilding; a SINC and Stepping Stones project; a youth engagement project; and a citizen/community science project.
- 2.7. LRWAG: This group will be responsible for exploring, in detail, the 11 opportunity areas proposed by the Taskforce for large-scale rewilding, with the aim of identifying the most appropriate site to deliver a pilot scheme. LWT, as delivery partner, will act as secretariat to the LRWAG. The LRWAG will engage with landowners and scope the 11 opportunity zones, undertaking technical studies and providing a report that may select one or two zones as the strongest potential options. On this basis, at least one site will be identified and agreed as the location for an initial large-scale rewilding pilot scheme. In parallel, the LRWAG will undertake work to explore and identify options for further funding to deliver the scheme. This may also provide learning for securing sustainable financing for further rewilding schemes and feedback to inform the LNRS.
- 2.8. SINCs and Stepping Stones: This will update guidance on identifying and protecting SINCs and Stepping Stone sites connecting them to reflect current policy contexts, including a greater emphasis on upgrading current SINCs and identifying opportunity areas for designation. A resource hub for London's boroughs will be created to aid the correct identification and protection of SINCs; and training events will be held for boroughs to increase their in-house awareness and expertise.
- 2.9. Youth engagement: This will continue LWT's sector-leading 'Keeping it Wild' paid traineeship project, which the Mayor has supported since 2021. This project has achieved significant success in meeting its aims of reaching groups who are historically underrepresented in the sector (see paragraph 3.6 for details). For this round, 20 young people (aged 16-25) will receive full-time training over four months; and work-readiness/careers support. The project focuses on young people who are underrepresented in the environmental sector for example, those from Black, Asian and minoritised ethnic backgrounds, and 'low' socio-economic backgrounds; and with disabilities. See MD2860 for more information about the scheme.
- 2.10. Community science: This will fund delivery by an appropriate partner organisation of a citizen/community science programme that would 'engage members of the public to conduct and contribute to scientific research'. In addition to involving the community in a rewilding-focused research project, and harnessing the benefits of wider participation in monitoring and tracking London's biodiversity, this initiative will also increase awareness, and widen the appeal, of such initiatives.

2.11. The Taskforce has already identified similar initiatives by organisations such as Thames21, the Natural History Museum, the Zoological Society of London, LWT and Citizen Zoo. Given the range of successful programmes available, the proposed approach is to partner on an existing initiative. This project will be grant-funded in accordance with the GLA's Contracts and Funding Code. It is proposed that the subsequent decision on the specific partner to work with and the details of the project be delegated to the Executive Director for Good Growth.

Evidence gathering to enable strategic green infrastructure delivery

- 2.12. The £0.657m programme of work under this theme consists of several projects.
- 2.13. Updating the ALGG: This will fund an update to the ALGG, building upon the original ALGG (2012) and combining it with the GLA's portfolio of existing green infrastructure maps and tools. This will make it an interactive map, rather than a static document, for use by boroughs and partners. It will replace the GLA's Green Infrastructure Focus Map, now over five years old, which will be updated and incorporated into the ALGG. The mapping layers and interactive tool will be developed in consultation with boroughs and stakeholders, as part of the LNRS stakeholder engagement.
- 2.14. The data underpinning the updated ALGG will enable the GLA to develop a spatial framework to help London's landowners and decision-makers plan; and enhance and manage green infrastructure assets strategically. The framework will inform future strategies and plans, such as updates to the London Plan and the Environment Strategy; and borough investment priorities and delivery opportunities. This work will be done internally or where additional datasets or services are required, will be procured according to the GLA's Contracts and Funding Code.
- 2.15. Access to and development of data: This will fund the GLA's annual data subscription and contract for project support with GiGL, which allows the GLA to continue using (and publishing) derived products that rely on GiGL data. This will support many GLA workstreams, including the GLA's planning function. GiGL datasets are unique and specialised towards species and spatial habitat data. GiGL relies on specialist GIS officers to verify and maintain the data; coordinates the natural history/ecology/conservation sector in London to improve the data; and coordinates with other environmental record centres outside of London. As London's formal local environmental record centre (LERC), they are the official organisation who hold these specific datasets and the annual subscription is to pay for access to their data.
- 2.16. This decision form also requests a related exemption from the requirement of the GLA's Contracts and Funding Code, to commission the above services without procuring competitively. In their role as London's LERC, GiGL is the only organisation that holds the breadth and, importantly, quality of environmental data that is needed to help inform the GLA's work. Using GiGL's data provides a cost saving for the GLA compared to the time and resources which would be needed to collate, manage and store this information in-house. GiGL's model allows these savings because all of GiGL users share the costs associated with maintaining a high-quality and up to data source of information through their service charges. GiGL's data management model also encourages a reciprocal data exchange whereby GiGL partners submit relevant data back to them. This means that we are easily able to access natural environment data which would not readily be available to us otherwise such as that collected by boroughs, wildlife charities or individuals for example in a format suitable for our use and from one place. Again, no other supplier offers this service.
- 2.17. The GLA have tested other approaches to collating relevant data. For example, the GLA's Planning team has run a trial working with boroughs to obtain the GIS boundaries relating to SINCs, which is a data set that GiGL manage. However, the GLA have not been able to obtain all of the boundaries from boroughs nor were the GLA able to keep the data set updated to the accuracy required because of the number of data holders involved and high turnover of information. GiGL's model of shared costs and reciprocal data exchange overcomes these issues and the GLA have determined that the best way forward is for the GLA to contract directly with GiGL to develop and publish an open-source data set of SINC boundaries on the London Datastore and maintain this on the GLA's behalf. This will be an output of the new contract. A single source justification will be required and completed.

- 2.18. It will also fund additional proposed data and mapping projects. These include projects that improve the data on which existing policies rely. This includes: a review of Public Open Space data; a review of Areas of Deficiency in Access to Public Open Space data; and an assessment of data condition in relation to Metropolitan SINCs. Reviews of and updates to these datasets will enable better application of London Plan policies (G4 and G6); and build the evidence to identify recommendations for future improvements to relevant policies.
- 2.19. Research and policy analysis: Several small pieces of research and policy analysis are needed to assess policies; review innovations; and build the evidence for future polices and delivery programmes. This research includes: an assessment of the impacts of the new Urban Greening Factor (London Plan Policy G5); an investigation of the effectiveness and long-term biodiversity/nature recovery monitoring efficacy of using the latest bio-acoustic (specifically for bat, bird and moths) and camera-trap equipment (small mammal monitoring, such as hedgehogs, deer, water voles and otters); an investigation into remote sensing and AI technology for habitat monitoring; and an investigation of how the GLA's green finance mechanisms could be applied to nature-based solutions, including biodiversity offsetting.
- 2.20. Programme evaluation: As part of evidence gathering, an evaluation of the existing portfolio of GLA nature and green infrastructure programmes is necessary to inform the design of future delivery programmes and ensure value for money.
- 2.21. All projects in this theme aim to build sector capacity; improve the evidence base; inform policy development; address gaps identified by stakeholders; and support the delivery of strategic green infrastructure interventions. The work will also support the GLA's statutory planning function. Research and consultancy work outside of the existing ongoing service-level agreement with GiGL will be tendered for, in accordance with the GLA's Contracts and Funding Code.

Statutory requirements - nature recovery and BNG

- 2.22. The £0.27m programme of work under this theme is made up of two projects that both fulfil new statutory requirements for the GLA. These are the LNRS for London and BNG.
- 2.23. LNRS: LNRS funding will be used for two fixed-term dedicated staff members at the GLA and one at GiGL. These staff will engage with the 33 local authorities, Natural England and expert stakeholders; they will also lead data and mapping work across London, supporting boroughs with technical expertise. These activities are to follow Defra statutory requirements for how to complete an LNRS. While funding is being provided by Defra for the LNRS, this is not sufficient to meet all of Defra's requirements (as outlined in 1.20-1.24), so additional funds are sought to do work that meets both the LNRS requirements and wider GLA objectives (as set out in the evidence gathering theme). The Defra funding will pay for the staff to lead the stakeholder engagement process, including coordinating London's local authorities (referred to as 'supporting authorities' in the regulations). The additional GLA funding will support the associated data gathering and development, which will be undertaken in parallel with work to update and replace the ALGG. This will help maximise efficiencies in terms of engagement with stakeholders and commissioning data updates. There will also be support to relevant organisations to engage groups underrepresented amongst existing stakeholders.
- 2.24. The outputs will be new spatial datasets related to nature; and the identification and collation of strategic biodiversity priorities for London, co-produced with 'supporting authorities'. This work will lead to the production of a Defra-compliant LNRS, which will also serve as the nature layer for the update of the ALGG, and feed into future updates to the London Environment Strategy and the London Plan.
- 2.25. BNG: The readiness work to support the government's rollout of BNG will be used to develop a BNG resource hub for London's local planning authorities (signposting existing resources and key strategic considerations for London); build capacity and technical support to internal teams, GLA functional bodies and London boroughs/local authorities on BNG readiness; and carry out research to identify where biodiversity offsetting can be used effectively in London, and the GLA's possible role in biodiversity offsetting. This will be fully covered by Defra funding.

- 2.26. This MD therefore seeks to approval for the receipt of the section 31 LNRS local capacity seed funding grant allocation, and section 31 (ring-fenced) BNG funding grant allocation from Defra; and its expenditure.
- 2.27. Table 1, below, details the main elements of the work programme; and overall costs, income and expenditure, broken down by financial year.

Table 1 – Details of, and budget for, London's rewilding, nature recovery and evidence programmes

Theme 1 - Rewilding		
Project	2023-24	2024-25
Large scale LRWAG	£75,000	£285,000
SINCs and Stepping Stones	£50,000	£85,000
Youth engagement	£0	£65,000
Citizen/Community science	£100,000	£100,000
Theme 1 total	£225,000	£535,000
Theme 2 – Evidence gathering to enable	e strategic gre	en infrastructure
delivery		·
Project	2023-24	2024-25
ALGG update	£30,000	£70,000
Research and policy analysis	£50,000	£45,000
Access to and development of data	£24,000	£238,000
Programme evaluation	£0	£200,000
Theme 2 total	£104,000	£553,000
Theme 3 – Statutory requirements - na	ture recovery a	and BNG
Project	2023-24	2024-25
LNRS staffing	£154,000	£154,000
LNRS data, engagement and production	£80,000	£120,000
BNG readiness	£26,807	£25,000
Theme 3 subtotal	£260,807	£299,000
LNRS income	-£127,000	-£111,000
BNG Income	-£26,807	-£25,000 (indicative)
Theme 3 income subtotal	-£153,807	-£136,000
Theme 3 total	£107,000	£163,000
Overall total	£436,000	£1,251,000

2.28. See Table 3 at paragraph 5.3, below, for a breakdown of corresponding budget lines. The funding in 2024-25 is subject to future budget confirmation and related approvals.

## 3. Equality comments

3.1. Under section 149 of the Equality Act 2010, as a public authority, the Mayor of London must have 'due regard' of the need to eliminate unlawful discrimination, harassment and victimisation; and advance equality of opportunity, and foster good relations, between people who have a protected characteristic<sup>3</sup> and those who do not. This involves having due regard to the need to remove or minimise any disadvantage suffered by those who share a relevant protected characteristic; taking steps to meet the different needs of such people; and encouraging them to participate in public life or in any other activity where their participation is disproportionately low.

<sup>&</sup>lt;sup>3</sup> The "protected" characteristics and groups are: age, disability, gender reassignment, pregnancy and maternity, race, sex, religion or belief, sexual orientation, and marriage/civil partnership status. Compliance with the Equality Act may involve treating people with a protected characteristic more favourably than those without the characteristic. The duty must be exercised with an open mind and at the time a decision is taken. Conscientious regard must be had that is appropriate in all of the circumstances.

- 3.2. The programmes outlined in this MD form part of the policies and proposals in the London Environment Strategy, which has been informed by a full Integrated Impact Assessment, including consideration of equalities.<sup>4</sup> The Equalities Assessment Report for the London Environment Strategy noted that exposure to poor environmental conditions is much higher among Black, Asian and minority ethnic Londoners.
- 3.3. Black, Asian and minority ethnic Londoners, and lower-income Londoners, are more likely to live in areas of deficiency of access to green space, or in areas where green space quality is poor. GLA research has found that parks are visited less often by women; adult Londoners aged 25 and under; lower-income Londoners; and social renters.<sup>13</sup> National research has found that Black, Asian and minority ethnic people are least likely to visit green spaces. Similarly, 21 per cent of households in London lack access to a private or shared garden; and across England, Black, Asian and minority ethnic people are less likely to have access to a garden than White people.<sup>14</sup>
- 3.4. Furthermore, this inequality is not limited to access, but is apparent at many levels from parks being 'white by design'<sup>5</sup> and children from Black, Asian and other minority ethnic backgrounds spending less time outside in nature,<sup>6</sup> through to linked health inequality<sup>7</sup> and lack of diversity in the green space sector.<sup>8</sup>
- 3.5. Climate change will disproportionately affect those least able to respond and recover from it. Poorer Londoners will find it more difficult to recover from flooding, and will suffer more from the impacts of the urban heat island effect. Extreme heat events will have a greater impact on older people, very young children, socially isolated people and people with existing health conditions.
- 3.6. The work outlined in this MD responds to, and aims to tackle, these disparities. For example, the Keeping it Wild programme is specifically aimed at supporting young Londoners from under-served communities into the sector. The programme, which began in 2018, has so far hosted 64 young people (aged 16-25) from underrepresented backgrounds. To date, 89 per cent of young people have come from Black, Asian and minority ethnic heritage; 42 per cent are young people living with a disability; and 58 per cent or from areas of high socio-economic deprivation. 70 per cent of trainees go on to further work or training in the sector.
- 3.7. The Taskforce's report specifies:

"A significant additional benefit of rewilding projects is the provision of nature-rich experiences for a large and diverse urban population, recognising the significant mental and physical health and wellbeing benefits these are likely to bring. Planning for access for as many people as is tenable from the very beginning of the design and development process is essential."

- 3.8. Consequently, the LRWAG will embed equity considerations into its approach for selecting the largescale rewilding pilot site. In addition, the pilot project will explore opportunities to enhance access to its site for Londoners from underrepresented groups.
- 3.9. The projects within the SINCs and Stepping Stones programmes will support the enhancement of SINCs, and the potential increase in their number; and build capacity and skills within boroughs. This will ensure SINCs are more resilient to the impacts of climate change; and borough parks and green spaces teams are better able to identify and respond to climate impacts. This will have wider benefits for those most impacted by climate change. Similarly, the LNRS, BNG and the update to the ALGG all seek to improve the evidence base that will enable better targeting of interventions in the future, including based on equality factors.

<sup>&</sup>lt;sup>4</sup> Temple, London Environment Strategy – Integrated Impact Assessment: Equality Impact Assessment Report, 10 August 2017 <sup>5</sup> See the work of Dr Bridget Snaith, University of East London, summarised in: Future of London, <u>Parks and green space: does</u> <u>everyone feel welcome?</u>, October 2023

<sup>&</sup>lt;sup>6</sup> 56 per cent spent time outside once a week, versus 70 per cent of children from a White background. See: Natural England, Monitor of Engagement with the Natural Environment, September 2019

<sup>&</sup>lt;sup>7</sup> 'All demographic groups benefit [from green space] but deprived groups appear to gain the most health benefit.' See: Public Health England, Improving access to greenspace, March 2020

<sup>&</sup>lt;sup>8</sup> GLA, London Green Spaces Commission report, August 2020

## 4. Other considerations

4.1. The key risks and issues are set out in Table 2, below.

## Table 2 – Risks and issues

Risk	Likelihood	Impact	Mitigation	RAG rating
Landowners in the opportunity zones proposed for a large- scale rewilding pilot project do not have resource or capacity to input into and assist with technical studies/researc h.	Medium	Medium	The LRWAG to write to the landowners within the zones to outline the project and timelines, to obtain early buy-in. The first phase of technical studies will be desk-based and include identification of landowners and capacity. This will inform the assessment of possible pilot options. The project is phased, so investment in the actual pilot will go through a future decision. If no pilot is identified, further phases will be needed.	AMBER
The delivery partner for the rewilding- themed projects no longer has capacity to support the programme.	Medium	Medium	The GLA will fund the delivery partner's capacity to support the programme as part of the grant agreement; and undertake regular monitoring to ensure long term capacity is stable.	AMBER
Future budget for upcoming financial year is not confirmed.	Medium	Medium	The GLA will insert a break clause in the MD and the grant agreement.	AMBER
Delays in recruitment and grant agreement/ procurement result in delays to key milestones.	Medium	Medium	The portfolio of work for the team that will run this programme has expanded in recent years, including with new statutory requirements. While new resource has been agreed to enable these programmes and recruitment to progress, delays in that recruitment or follow on activities, such as procurement and grant agreements, may lead to delays in starting the work, particularly the larger pieces of work, such as the LRWAG and the LNRS. This is being mitigated by temporarily redeploying staff from other projects and using temporary staff to progress.	AMBER

Considerations for the provision of grant funding

- 4.2. This MD proposes that a direct grant award is made to LWT, who will act as responsible body for most of the programme of works within the rewilding theme (specifically coordinating the LRWAG; leading the SINCs and Stepping Stones projects; and running the rewilding youth engagement project). They will work with land use consultants and GiGL, as required, for evidence gathering and technical studies.
- 4.3. The strategy of granting funds to LWT in this way has been chosen for the following reasons:
  - LWT is the only pan-London NGO with networks capable of delivering (in partnership) the range, depth and quality of SINC and habitat advice needed to effectively support London boroughs with varying technical advice needs, as set out in the Taskforce recommendations.
  - It is experienced in working with GiGL, which holds the majority of SINC data across the capital and is the official environmental records centre for London.
  - Its unique mix of existing stakeholder relationships (including with landowners in London's SINC network and rewilding experts) and in-house technical expertise means that aligning the coordination of the LRWAG with the SINC and Stepping Stones work will achieve efficiencies that allow quicker, more cost-effective progress.
  - LWT does not sell goods or services for profit in a competitive market. It is a charitable organisation that puts funding back into nature recovery in London. It will also be contributing its own resources to supplement the activity funded by the GLA, including existing staff, project management, communications, IT equipment and match funding, where appropriate.
  - LWT's youth programmes are the most comprehensive and mature in the sector, with specific aims to improve equality, diversity and inclusion in the sector.
- 4.4. The proposed award for grant funding to LWT does not constitute subsidies for the purpose of the Subsidy Control Act 2022. This is because none of the proposed recipients are engaging in economic activity, i.e., they are not operating on a market in which there is competition. The funded activities are not activities that involve LWT acting on a market for which there is competition.

## Links to Mayoral strategies and priorities

- 4.5. The work outlined in this MD will contribute towards:
  - London Environment Strategy Policy 5.1.1: protect, enhance and increase green areas in the city, to provide green infrastructure services and benefits that London needs now and, in the future.
  - London Environment Strategy Proposal 5.1.1.f: back greater community involvement in the improvement and management of London's green spaces and natural environment.
  - London Environment Strategy Objective 5.2: conserving and enhancing wildlife and natural habitats.
  - London Environment Strategy Policy 5.2.1: protect a core network of nature conservation sites and ensure a net gain in biodiversity.
  - London Environment Strategy Policy 5.3.1: address underinvestment, and improve the management of London's green infrastructure, by developing new business models and improving the awareness of the benefits of London's green infrastructure.
  - London Health Inequalities Strategy Objective 3.3: a greener city where all Londoners have access to good-quality green spaces.
  - Green New Deal mission to tackle the climate and ecological emergencies and improve air quality by doubling the size of London's green economy by 2030 to accelerate job creation for all.

- London Rewilding Taskforce Recommendation 1: Enable development of large-scale rewilding projects in London to support nature recovery and greater resilience of biodiversity.
- London Rewilding Taskforce Recommendation 2: Support positive long-term management and monitoring of key Stepping Stone sites so that their role in London's nature network and connections between large-scale rewilding sites is maximised.
- London Rewilding Taskforce Recommendation 3.1: Engage local communities and young people from early stages of project development within identified rewilding opportunity zones (linked to Recommendation 1.2).
- London Rewilding Taskforce Recommendation 3.2: Support activities linked to rewilding 'stepping stone' projects that build on existing GLA and partners' initiatives and that provide meaningful opportunities for Londoners to enhance biodiversity.
- London Rewilding Taskforce Recommendation 3.3: Build on public interest and enthusiasm around rewilding to share and reframe messages about nature to promote wilder, more natural approaches to urban greening.
- New Deal for Young People aims: to build a fairer, more equal and more prosperous London, where no-one is left behind.
- New Deal for Young People outcomes: Improved well-being; improved socio-emotional learning; improved relationships; and improved employment opportunities.
- London Plan Policy G1 Green infrastructure: Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised.
- London Plan Policy G3 Metropolitan Open Land (MOL): boroughs should work with partners to enhance the quality and range of uses of MOL.
- London Plan Policy G6 Biodiversity and access to nature: using up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks.

## Consultations and impact assessments

- 4.6. Conserving London's wildlife and natural habitats is one of the three strategic green infrastructure priorities of the 2018 London Environment Strategy. The evidence base for the strategy showed that SINCs are integral to meeting this aim. However, it also showed that they were at risk from a chronic lack of management that would ultimately lead to declines in nature and in their quality as green spaces for people. The responses received during the public consultation on the London Environment Strategy supported this conclusion, and identified conserving wildlife sites and providing support and guidance for their management as a priority.<sup>9</sup> The Integrated Impact Assessment for the strategy concluded that no negative effects were identified for the Equality Impact Assessment in relation to strategic green infrastructure polices. It also found that improving the quality of green spaces, such as SINCs, would have positive impact on addressing inequalities in access to green space and nature.
- 4.7. In Summer 2022, the Taskforce issued a call for evidence to stakeholders, and a Talk London online discussion and survey. Both of these informed the Taskforce recommendations. The responses raised similar issues as those outlined in paragraph 4.1. The call for evidence noted that local authorities manage significant areas of natural green space, but have no statutory duty to do this, and have suffered budget reductions. It also noted that existing government funding mechanisms are typically not a good fit for urban areas. Another barrier identified was that local authorities are missing the necessary expertise and skill sets to plan, deliver and monitor rewilding projects, and to access

<sup>&</sup>lt;sup>9</sup> Mayor of London, London Environment Strategy – Consultation Response Report

funding. The Talk London survey found that most respondents appreciated the benefits of spending time in green spaces for their mental health (72 per cent) and physical health and wellbeing (66 per cent). Environmental issues, such as declining wildlife, were a big concern for many of the respondents. They felt very worried about insects and birds disappearing (76 per cent) and varieties of animals declining (69 per cent).<sup>10</sup>

4.8. The London Plan was subject to a significant statutory process of consultation and Integrated Impact Assessment. The formal consultation process resulted in over 4,000 written submissions, with over 300 different organisations or individuals participating in the hearing sessions for the Examination in Public. Several of the projects described in this MD will facilitate implementation of London Plan policies by improving the data upon which, in many cases, those policies rely. For example, under the 'enabling strategic green infrastructure delivery' theme, Urban Greening Factor impact monitoring; the review of Public Open Space data; and review of Metropolitan SINC condition.

### Conflicts of interest

4.9. If any conflicts of interest arise during the delivery of the programme (i.e., a GLA officer or expert technical adviser has links with an organisation that is awarded a grant or tenders for work), they will declare that interest and not take any part in assessing submissions or awarding funding to that organisation. There are no conflicts of interest arising from any officer involved in the drafting or clearance of this decision form.

## 5. Financial comments

- 5.1. Approval is requested for the following:
  - expenditure of up to £1.687m to fund the Rewilding Programme; evidence gathering to enable strategic green infrastructure delivery; preparation of the LNRS; and support for BNG across 2023-24 and 2024-25. Expenditure is expected to be £436k in 2023-24 and £1.251m in 2024-25.
  - receipt of £289,807 from Defra to support the preparation of an LNRS for London and readiness for mandatory BNG; and expenditure of the same over 2023-24 and 2024-25.
- 5.2. The planned expenditure of £1.687m is to be funded from within the Climate Resilience Through Nature and Inclusive Green Space budgets, held within the Environment Unit. There is sufficient budget included within the draft 2024-25 budget plan to cover the expenditure. However, this is subject to approval as part of the Mayor's budget-setting process. To mitigate any risk of the programme not being sufficiently resourced to cover costs in future years following the budget-setting process, any contractual agreements will include the usual break clauses that would be exercised if required.
- 5.3. The planned profile is set out in the table below with a detailed breakdown shown at paragraph 2.27:

	2023-24	2024-25	Total
Planned expenditure profile			= 8
Budget lines	÷ -	115	1
Climate Resilience Through Nature	£436,000	£466,000	£902,000
Inclusive Green Space		£785,000	£785,000
Total budget	£436,000	£1,251,000	£1,687,000

Table 3: GLA budget summary (net of income)

<sup>&</sup>lt;sup>10</sup> Rewilding London: Final report of the London Rewildling Taskforce (2023), Appendix 4, pp.87, 89.

- 5.4. The £289,807 income from Defra comprises two separate grants: the LNRS grant and the BNG grant. The Act gave the GLA additional duties, as outlined in section 1.20–1.24. Alongside this, the GLA has been provided additional funding to discharge these responsibilities under these two grants.
- 5.5. The BNG grant for 2023-24 has already been received by the GLA and therefore this decision requests retrospective approval for the receipt. The funding for 2024-25 is yet to be confirmed by Defra, but at present is expected to be in the region of £25,000. Any underspend against the grant may need to be returned to Defra.
- 5.6. The LNRS grant has been confirmed at £126,956 for 2023-24; and is estimated as £111,000 for 2024-25. The grant is not ring-fenced and there are no restrictions with regards to carrying over any unspent grant to future years.

	2023-24	2024-25	Total
Grant income			
LNRS income	-£127,000	-£111,000	-£238,000
BNG income	-£26,807	-£25,000	-£51,807
Total budget	-£153,807	-£136,000	-£289,807

5.7. The expected profile of the grant income is shown below:

## 6. Legal comments

- 6.1. The foregoing sections of this report indicate that the decisions requested of the Mayor concern the exercise of the GLA's general powers, falling within the GLA's statutory powers to do such things considered to further or that are facilitative of, or conductive or incidental to, the promotion of economic development and wealth creation, social development or improvement of the environment, in Greater London.
- 6.2. In implementing the proposals in respect of which a decision is sought, officers (which will extend to the Executive Director of Good Growth in the exercise of powers delegated pursuant to this decision) should comply with the GLA's related statutory duties to:
  - pay due regard to the principle that there should be equality of opportunity for all people
  - consider how the proposals will promote the improvement of health of persons, health inequalities between persons and contribute towards the achievement of sustainable development in the United Kingdom
  - consult with appropriate bodies.
- 6.3. In taking the decisions requested, as noted in section 3 above, the Mayor (which will extend to the Executive Director of Good Growth in the exercise of powers delegated pursuant to this decision) must have due regard to the Public Sector Equality Duty under section 149 of the Equality Act 2010 namely the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010; advance equality of opportunity between persons who share a relevant protected characteristic (race, disability, age, sex, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment) and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it. To this end, the Mayor should have particular regard to section 3 (above) of this report.
- 6.4. The Mayor may delegate the exercise of the GLA's powers to the Executive Director of Good Growth (pursuant to section 38 of the Greater London Authority Act 1999) should he wish.
- 6.5. If the Mayor makes the decisions sought officers must ensure that:

- the proposed grant funding is distributed fairly; transparently; in accordance with the GLA's
  equality policy and subsidy control rules; and in a manner that affords value for money in
  accordance with the GLA Contracts and Funding Code an appropriate funding agreement being
  put in place and executed by the GLA and the recipient before any commitment to funding is
  made
- they have satisfied themselves that there are sufficient grounds for an exemption from the GLA's Contracts and Funding Code (the "Code") to commission the above services from GiGL without procuring competitively
- no commitments are made in reliance of the proposed Defra funding until there is a legally binding commitment from Defra in that regard; and any decisions concerning staffing matters are made fully in accordance with all applicable GLA HR and related governance protocols.
- 6.6. The procurement to commission data subscription and support services from GiGL is valued at £52,000 (comprising of £24,000 for 2023-24 and £28,000 for 2024-25), whereby GLA's payment for services will be covered by the overall expenditure requested under this MD. Section 9 of the Code requires that the Authority undertake a formal tender process or make a call off from an accessible framework for procurements with a value between £10,000 and £150,000. However, section 10 of the Code also provides that an exemption from this requirement may be justified on the basis of complete lack of competition. The officers have set out at paragraphs 2.16 to 2.17 above the reasons why the procurement of the services from GiGL falls within the said exemption. Accordingly, the Mayor may approve the exemption, if he be so minded.

## 7. Planned delivery approach and next steps

Activity	Тітеіле
Large-scale rewilding	50 B
Delivery partner in place, LRWAG established	January 2024
Commence initial assessment of 11 rewilding areas	February 2024
Deliverability matrix	August 2024
Feasibility studies	September 2024 – May 2025
Report with recommended pilot project	July 2025
SINCs and Stepping Stone management and delivery	0.
SINC selection guidelines review – final draft	October 2024
Resource hub	January 2025
Rewilding engagement	8 10
Identification of a partner community science programme	February – March 2024
Youth programmes commence	November 2024
Evidence gathering to enable strategic green	3
infrastructure delivery	
ALGG update evidence gathering start	February 2024
Procurement for programme evaluation	January – June 2024
Urban Greening Factor impact review	September 2024
Review of Public Open Space data and Areas of Deficiency of	December 2024
Public Open Space (AodPoS) use	
Programme evaluation complete	March 2025
Successor to the ALGG published	April 2025
GiGL data subscription	Annual ongoing
Jpdate and development of mapping and tools	Ongoing
Habitat and species evidence base complete	June 2025

7.1. This project will be delivered in accordance with the timetable below:

Research and reports	Throughout 2024	
LNRS		
Stakeholder engagement under way	November 2023	
LNRS Mapping Officer in place	April 2024	
Draft LNRS for public consultation	January – March 2025	
LNRS publication	May 2025	
BNG		
Government guidance released and policy in effect	November 2023 – January 2024	
Technical support and research complete	December 2023 – March 2024	

Appendices and supporting papers: Local Nature Recovery Strategy appointment and funding letter Biodiversity Net Gain funding letter.

## **Public access to information**

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note**: This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

Part 1 – Deferral

## Is the publication of Part 1 of this approval to be deferred? YES

If YES, for what reason: Publication to be deferred until after the response to the London Climate Resilience Review and the winners of the Rewild London Fund are announced.

Until what date: 15 February 2024 (indicative)

## Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

## Is there a part 2 form? NO

ORIGINATING OFFICER DECLARATION: Drafting officer:	Drafting officer to confirm the following $(\checkmark)$
Abby Crisostomo has drafted this report in accordance with GLA procedures and confirms the following:	$\checkmark$
<b>Sponsoring Director:</b> Philip Graham has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.	$\checkmark$
Mayoral Adviser: Shirley Rodrigues has been consulted about the proposal and agrees the recommendations. Advice:	$\checkmark$
The Finance and Legal teams have commented on this proposal.	$\checkmark$
<b>Corporate Investment Board</b> This decision was agreed by the Corporate Investment Board on 18 December 2023.	✓

## **INTERIM CHIEF FINANCE OFFICER:**

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature:

Date: 18/12/2023

## **CHIEF OF STAFF:**

I am satisfied that this is an appropriate request to be submitted to the Mayor.

Signature:

**Date:** 18/12/2023

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