

MAYOR OF LONDON

Zack Polanski AM

Chair of the London Assembly Environment Committee
C/o Richard.Clarke@london.gov.uk

Our ref: MGLA180324-9063

Date: 8 August 2024

Dear Zack,

Your predecessor as Chair, Leonie Cooper AM, wrote to me with the former Committee's recommendations following an investigation into the protection and improvement of green spaces and greening grey infrastructure in London. Please find in the annex responses to the recommendations made in AM Cooper's letter.

I am committed to protecting and improving London's green spaces, and there are multiple policies and programmes in place through my London Environment Strategy and my London Plan to do just that. However, the day-to-day management of green spaces and local planning decisions relating to green spaces generally sit with local authorities.

London has shown significant leadership in innovative approaches to protect and increase green space, including the Urban Greening Factor. Strategic support has been provided to the boroughs, we commissioned the first natural capital account for the city, we set up a Green Spaces Commission, and we continue to make tools and data on the natural environment across London available to support decision-making. We have also provided direct funding to the boroughs and community-based organisations across London through our Green and Resilient Spaces fund and our Grow Back Greener fund to restore and create new green space.

You will be aware of our recent appointment as a 'Responsible Authority' to produce a Local Nature Recovery Strategy for London. While I welcome the opportunity to lead this for London, the Government has not backed this up with adequate financial support for the preparation and delivery of the strategy. I will continue to do all I can to deliver a greener London, but given the scale of the challenge, I cannot do this alone. Working with partners to protect and improve green spaces in our city and lobbying the Government for fair resourcing for London will be more important than ever.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Sadiq Khan', with a small '2' written below the name.

Sadiq Khan

Mayor of London

MAYOR OF LONDON

Annex

Mayor of London's response to the recommendations of the London Assembly Environment Committee's investigation into protecting and improving green spaces and greening grey infrastructure in London.

Recommendation 1

The Mayor should maintain existing protections for green spaces in London, and explore ways to further strengthen the ability of London Boroughs to protect sites from inappropriate development through the planning process. Where the Mayor makes planning decisions involving mitigation or compensation, he should ensure full and transparent information is published around how all avenues to avoid harm have been explored, and call on boroughs to follow similar standards.

The London Plan 2021 includes strategic policies for the protection of green spaces in the capital. These include GG2 Green Belt, GG3 Metropolitan Open Land, and GG4 Open Space.

National planning policy and guidance on up-to-date plans requires the London Plan to undergo a review within five years of publication. This review process is currently at an early stage. The review is being undertaken using a structured process that – depending on many factors (including the monitoring of published Plan outcomes) – could result in policies being retained unchanged, amended to reflect current legislation and/or be consistent with the most recent national policy, or substantially/entirely redrafted, e.g. to strengthen them for use by the Mayor, and by the boroughs in policy-making and decision-taking.

The London Plan is a statutory development plan document and is used for the determination of planning applications in London. The London Plan forms part of local planning authority Development Plans, along with local plans adopted by individual boroughs. Adopted local plans must be in general conformity with the London Plan (s24(1)(b) of the Planning and Compulsory Purchase Act 2004). Decisions on planning applications that are then made by the boroughs (and the Mayor or the Secretary of State when 'called in') must be in accordance with the London Plan 2021 and a borough's own adopted local plan unless material considerations indicate otherwise. This statutory framework of plan-making and decision-taking means that London's green infrastructure can be protected from inappropriate development by the Mayor, through policy-making at borough level and in development management.

Where the Mayor makes planning decisions, all relevant information is made publicly accessible. The Mayor makes planning decisions only on the limited number of referable applications that the Mayor decides to 'call in' and to act as the local planning authority. The use of planning conditions and s106 obligations are the principal means by which any harm from approved development will then be avoided or mitigated. Decisions made by the Mayor and relevant supporting documentation – including accompanying s106 planning obligations – can be viewed by the public on the [GLA website](#).

Prior to any call-in decision, the Mayor provides commentary, conclusions and recommendations on development proposals and their compliance or otherwise with London Plan policies in Stage 1 (following validation of a planning application) and Stage 2 (when a recommendation has been made by a local planning authority) reports. At Stage 2, the Mayor can advise either that the borough determines the application itself or that the decision will be called in, subject to any action the Secretary of State may take. It is the responsibility of all these decision makers to follow the same standards – to determine applications in accordance with development plan document policies, unless material considerations indicate otherwise. Relevant documents, including Stage 1

MAYOR OF LONDON

and 2 reports, decision notices and s106 planning obligations are available for the public to view on each borough's online planning register (or for ministerial decisions, on the DLUHC website).

Recommendation 2

The Mayor should review the 10 per cent biodiversity net gain level in the London Plan, and consider increasing it further in the future to 20 per cent.

The London Plan is currently being reviewed, as described above. Whether to amend biodiversity net gain targets will be considered in the course of that review.

Recommendation 3

The Mayor should use the opportunity of London's Local Nature Recovery Strategy to improve data collection around green spaces and biodiversity across London, including street trees, green corridors and habitats, across both publicly and privately owned land. This should include stronger requirements for developers to record baseline and changes to sites on GiGL in a timely manner.

The Mayor will be preparing the London Local Nature Recovery Strategy (LNRS) for publication in the summer of 2025. The Mayor is also preparing a review and update of the All London Green Grid and the GLA's existing Green Infrastructure Focus Map which, combined with the LNRS, will be incorporated into a new spatial framework for green infrastructure across London.

As part of this process, officers will work closely with London's strategic stakeholders to ensure the LNRS and the new London Green Infrastructure Framework reflect the most relevant and up-to-date data available.

Data is key to understanding the current baseline and monitoring the status of priority habitats and species in London, especially for future reviews of the LNRS. Greenspace Information for Greater London (GiGL) is London's Local Environmental Records Centre and the repository of all London's wildlife records and spatial data relating to our wildlife sites. Currently, they have close to six million species records. London has an amazing recording community (both professional and volunteer), which has contributed to this data set and was fundamental in setting up the current wildlife site system; this data should be used in both local and regional decision making, especially in planning.

The Mayor will work with GiGL and other partners to identify opportunities to strengthen the use of and input into its data in the planning process.

Through the LNRS process, officers will also work with GiGL and land managers across London to coordinate and develop systems to help spatially record habitat improvement opportunities and action on the ground. The Mayor is also working with partners to develop a species monitoring framework for London using the latest wildlife recording technology.

Recommendation 4

In response to this letter, the Mayor should provide the Committee with an update on the work to develop a National Park City Community Engagement Plan for boroughs, including:

- **How it will use the National Park City concept to engage people across London with nature and to see their city differently;**
- **Future initiatives to use the National Park City concept to increase the diversity of people accessing green spaces, and work to correct historic inequities of access.**

MAYOR OF LONDON

The Mayor is working with the National Park City Foundation (NPCF) as part of the work to prepare the London LNRS. Liaising with boroughs, the NPCF is carrying out research on previous and current engagement with communities with a focus on nature and climate change to understand the extent of existing engagement taking place across London and identify opportunities for further engagement. Using this research, it will deliver a community engagement plan/framework as a standard to support boroughs to engage and empower a wider and more representative range of Londoners.

As part of the grassroots movement to make the city greener, healthier and wilder, the Mayor will continue to work with the NPCF to develop campaigns and activities that contribute towards shared National Park City aims, including increasing the diversity of people accessing green spaces and overcoming inequities of access.

Recommendation 5

The Mayor should work with local councils to ensure that there is a systematic process for recording the removal of mature trees in areas where the council in question has responsibility.

The removal of mature trees is a difficult dataset to collate with consistency and accuracy. Historically, boroughs have not collated tree removal information consistently across their different land holdings (e.g. housing, parks, highways, etc.). Any tree removal records available would be a partial picture of the overall trends across London boroughs. Furthermore, as borough-managed trees are only one part of the urban forest, any figures would be a poor representation of trends across London overall.

The duty on local authorities to consult on the felling of street trees came into force in November 2023. This may provide a means to better monitoring of tree felling in the future, but it should be noted that the duty only relates to street trees and includes a number of exceptions (trees that are dead, dangerous, or subject to emergency statutory services work).

Canopy cover measurement provides a means of monitoring overall trends in tree cover across all types of land and is considered to be a more efficient and meaningful way of monitoring change over time.

Recommendation 6

The Mayor should consider updating his greening targets to go beyond canopy cover to include additional targets that measure the net change in numbers of trees, and survival rates of new trees. This could include a new target for the number of trees the Mayor is aiming to plant.

Any revision of targets will be decided through the London Plan review processes.

Net change in tree numbers is not considered an informative measure of the benefits trees and canopy cover provide. For example, recent monitoring work in [Torbay](#) demonstrated an increase in canopy cover over the past 10 years despite a reduction in the number of trees. This, combined with the fact that establishing a comprehensive picture of London's canopy cover via the collation of individual tree data is impractical (given the difficulties of data collection), is why monitoring canopy cover via the modelling of aerial imagery is considered the most useful measure of the overall trend, despite the inherent difficulties of that monitoring.

MAYOR OF LONDON

Tree equity – the idea that all communities have equitable access to the benefits of trees where they live – is increasingly being explored as a meaningful measure of impact. Other insightful indicators include age and species distribution. The challenges of data collection are explored more in the [London Urban Forest Plan](#).

Recommendation 7

TfL should increase its tree planting targets to ensure that there is a larger net increase in numbers of trees, and that the trees planted are adequately looked after to ensure that they survive to maturity. TfL should ensure that the evidence base to inform its forthcoming tree canopy cover plan considers maintenance.

The recently published Transport for London (TfL) [Green Infrastructure and Biodiversity \(GI & B\) Plan](#) outlines its approach to tree planting. TfL has a Mayoral Transport Strategy target of 1% increase in street tree numbers 2016-2025, which has been met. Since meeting that target, TfL's GI & B plan:

- advocates for the right tree in the right place with the right maintenance;
- commits TfL to developing outcome-focused green infrastructure targets (e.g., based on increasing ecosystem services) by the end of 2025; and
- commits TfL to developing an evidence-based canopy cover plan to identify the best locations for tree planting across its estate.

Together, these will avoid planting trees in unsuitable locations and help ensure that canopy cover, and the many benefits that this provides to London and the public, is maintained and increased where appropriate.

Recommendation 8

The Mayor should ensure that Transport for London encourages all Councils to complete a kerbside strategy by January 2025, which clearly outlines actions to increase biodiversity, including targets for Sustainable Drainage Systems (SuDS) and numbers of new parklets for the period 2025-2030.

TfL already encourages the boroughs to integrate SuDS and green infrastructure as part of the Local Implementation Plan guidance. TfL recognises the importance of optimising road space allocation, including for green infrastructure, and is actively exploring how this could be improved for the TfL Road Network. Once this work is completed, TfL will engage with London Councils to explore the most effective options for boroughs to learn from and potentially scale up this work across London.