

Boris Johnson
Mayor of London
City Hall
The Queen's Walk
London SE1 2AA

London Assembly
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London, SE1 2AA

26 March 2015

Dear Boris

Protecting and enhancing biodiversity in London

On 3 March, the Environment Committee met with a number of experts, including the Director of Policy & Planning at the London Wildlife Trust, the Vice Chair of the London Boroughs Biodiversity Forum, the Associate Director of Ecology at Atkins and the Chief Executive Officer of Froglife, as well as the Principal Policy & Programme Officer from the GLA

The meeting discussed the role of biodiversity in London, the draft update to your 2002 Biodiversity Strategy, currently being finalised by your environment team, as well as practical issues of implementing the strategic policy framework at borough level.

We were told that a significant proportion of London boroughs have no regular in-house or any other **ecological expertise** contributing to how they deal with their planning applications. As Mayor could you address that lack of expertise by offering or facilitating a London-wide ecology resource that local planning authorities could access?

The **lack of biodiversity monitoring data** from London's Sites of Importance for Nature Conservation (SINC) is a barrier to the successful implementation and monitoring of your biodiversity strategy. Some boroughs have not monitored their SINC's in almost 20 years. The expert panel suggested that the GLA could reinstate its rolling programme of re-survey to keep information on London's habitats updated every ten years, and use the information collected to review the identification of SINC's in each borough surveyed, working closely with officers of the borough. At the very least the most important habitats and Sites of Metropolitan Importance should be centrally surveyed. The GLA could also have a role in encouraging or coordinating data collection at borough level.

At the meeting, Members also recognised the **role of the All London Green Grid (ALGG)** in promoting the design and delivery of green infrastructure across London, but noted the lack of clear evidence for the impact of the programme on biodiversity. Please could you set out this evidence to demonstrate that the delivery of the ALGG is enhancing biodiversity in London?

Further background information and details of the March session are enclosed at **Appendix 1**.

The Committee would be grateful if you could respond to the issues raised in this letter by **8 May**, to enable us to note your response at our next meeting in June. Please send an electronic copy of your response to the Committee's assistant scrutiny manager Alex Beer (alexandra.beer@london.gov.uk).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Stephen Knight', written in a cursive style.

Stephen Knight AM

Chair of the Environment Committee

Appendix 1 - Key issues raised at March 2015 Committee meeting

Enabling sufficient access to ecology expertise for local planning authorities (LPAs)

A strong policy framework, including the Biodiversity Strategy and the London Plan, is in place to prevent damage to London's biodiversity through the development control process. Guests debated whether there was also the political will to implement the framework because there are so many competing pressures that all have to be balanced somehow, and noted that access to adequate ecology expertise is needed to do so.

Last year, the All Party Parliamentary Group on Biodiversity (APPGb) considered the importance of ecological capacity in local planning authorities (LPAs). It found that the planning system should prevent biodiversity decline and inappropriate development, but to do so, LPAs must have the necessary expertise to deal with necessarily complex ecological issues. The Mayor's Biodiversity Strategy noted that the Mayor's staff have the expertise to provide LPAs with advice on biodiversity with a strategic overview of the London-wide importance of sites and species, and will do so whenever possible. It also states that *"The Mayor sees the provision of this advice as a very important part of the implementation of this Strategy"*.

At the Committee's March meeting, Mathew Frith pointed to a 2013 report by the Association of Local Government Ecologists¹ which suggested that many LPAs do not currently have either the capacity or the competence to undertake the effective, and in some cases necessarily lawful, assessments of planning applications where biodiversity is a material consideration. It is thought that at the moment somewhere between half and two thirds of London boroughs have an ecologist but it is unclear how many are regularly liaising with planning teams. John Archer stated that: *"A significant proportion - it is a minority but a substantial minority - of London boroughs have no regular in-house or any other ecological expertise contributing to how they deal with their planning applications"*.

Collecting and monitoring London's biodiversity data and reviewing sites

London's most important wildlife sites are recognised by the Mayor and London borough councils as Sites of Importance for Nature Conservation (SINC). In total, over 1,400 SINC's have been identified. Some boroughs survey their SINC's in the Local Development Framework (LDF) process, but others have not surveyed their SINC's for up to 20 years. The 2002 Biodiversity Strategy notes that *"The Mayor is committed, as an important part of this Strategy, to a rolling programme of re-survey to keep the information on London's habitats updated every ten years. (...) The information collected will be used to review the identification of SINC's in each borough surveyed, working closely with officers of the borough."* This GLA survey has since been discontinued and is now the sole responsibility of local authorities.

John Archer, Vice Chair, London Boroughs Biodiversity Forum (LBFF), noted an inconsistent approach across London: *"If it is left to the boroughs, there will be some that will do a survey every five years, some that will do a partial survey every three or four years, some that might do something every ten years and some that will do nothing at all. If we want even, strategic data from across London, the only organisation that is going to collect that is the Mayor's team. (...) At least for the most important habitats and the Sites of Metropolitan Importance"*.

¹ Oxford, M. (2013): *Ecological Capacity and Competence in Local Planning Authorities: What is needed to deliver statutory obligations for biodiversity?* Report published by the Association of Local Government Ecologists.

Mathew Frith, Director of Policy and Planning, London Wildlife Trust, felt that there was *“no demonstrative interest from the Mayor in looking at the strategic sites and making sure that our SINC systems are up-to-date”*. Kathy Wormald, Chief Executive Officer, Froglife, told the Committee that amphibian and reptile populations are declining but that more detailed species data is lacking across the country, compared to, for example, bird data: *“It is important for us to know what species and where they are and where the work should be targeted. Otherwise we are potentially spending donors’ money on areas that may not be as important”*.

Guests also highlighted to the Committee the value of Greenspace Information for Greater London (GiGL) which offers its members a way of accessing and storing information and being able to use information to analyse, regarding planning decisions or on-site management. Nonetheless, not all London boroughs are partners of that and the Mayor may wish to urge local authorities to join or to become partners of GiGL to ensure his biodiversity policies can be sufficiently implemented. Peter Massini, Principal Policy and Programme Officer, GLA, noted that there was uncertainty over how much of any data collected through the planning process, for example by consultants working for applicants, was being deposited with an authority and feeds into GiGL database or a SINC review.

Delivering biodiversity protection and enhancement through the All London Green Grid (ALGG)

The ALGG is a policy framework to promote the design and delivery of green infrastructure across London. It supports London Plan policies on green infrastructure, urban greening, open spaces, biodiversity, trees and woodland, and river corridors.

At the meeting, Members heard that London’s borough biodiversity officers are concerned about the importance that the Draft Update to the Biodiversity Strategy places on the ALGG. John Archer felt that while the ALGG is potentially an extremely useful tool for biodiversity enhancement, it was unclear whether it successfully enhanced and continued to properly manage existing habitats.

John subsequently suggested that the boroughs *“would like to see some evidence that the ALGG is delivering for biodiversity. GiGL or another suitable body could do an audit of the projects that have been done under the umbrella of the ALGG to date; this could include looking at the list of priority projects to see what they have delivered – or will deliver – in terms of habitats and spaces”*.