

Assembly Scrutiny of the Mayor's Biodiversity Strategy

April 2001

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Note

This report is a summary prepared for the Assembly. The full report, as received by the Environment Committee, contains several detailed appendices including a detailed line by line analysis of the Mayor's draft Strategy, and a memorandum from the Chair of the Economic Development Committee dated 4 April 2001. The full report has been made available to the Mayor's Office and is available to any Member who may wish to see it, on application to the Secretary of the Environment Committee. It is also available to the public in the Committee papers section of the web site www.london.gov.uk, Environment Committee meeting 5 April 2001.

Executive Summary

The Assembly welcomes the Mayor's Biodiversity Strategy, noting that it provides much of the basis for securing preservation and enhancement of biodiversity in the Capital. The document is to be complimented for its intention to promote biodiversity, conservation and amenities for all Londoners.

The Assembly recommends certain improvements to the Strategy, on the grounds that it does not provide a clear vision and is not sufficiently focused to provide a strong strategy for London. It does not seek to manage the many likely conflicts that arise between biodiversity preservation and development. In its present form, the Strategy does not give direction to the Spatial Development Strategy, which will have a profound effect on biodiversity in London.

This review was conducted for the Assembly by the Environment Committee. The Committee examined the Strategy to determine whether it showed a clear vision, whether that vision was realistic and could be resourced properly, and whether the Strategy is representative of the organisations and communities concerned.

The Committee's conclusions are summarised below and discussed in the main report.

Vision

- The Strategy does not present a clear vision of how biodiversity should be created and maintained in London.
- It does not give sufficient guidance as to how people or communities can take effective action for biodiversity, especially in the face of development pressure.
- It does not provide a visionary action plan for innovative habitat creation.
- The document should indicate priorities for its proposals and how any available resources should be allocated to it.
- A map identifying important areas for biodiversity, and how they would be ideally linked, would be a useful tool to explain the vision.
- The vision would be improved by drawing explicitly on examples of good urban design for biodiversity from the rest of the UK and Europe.

Implementation

- There need to be clear priorities within the strategy in the face of anticipated resource limitations, with indications of timetable for implementation.
- The targets for habitats and species in the London Biodiversity Action Plan should be brought into the Strategy itself.
- The details of how the Strategy will be implemented require much more careful consideration. This should include dealing with existing and potential problems.

Specific well-drafted guidance is needed, for the Boroughs and the Development Sector on:

- The role of developers in the construction sector and existing commercial concerns to ensure clarity for all involved.
- The subject of species appropriateness and balance in relation to species preservation.
- The redevelopment and practical preservation of brownfield sites. This guidance may need to be detailed and site-specific.
- Case studies of best practice could be usefully included in the guidance.
- The Mayor should work in partnership with the ALG and the Boroughs to produce this guidance.

Funding

- Given the funding structure it would be appropriate to make changes to the number of action points where the GLA is named as lead partner.
- The GLA should provide advice to community groups and developers on sources of funding as well as biodiversity, within the priorities established in the Strategy.
- MBS priorities and subsequent funding should be linked with the London Biodiversity Action Plan.
- Much greater consideration should be given to education for which a stand-alone policy could usefully be established, in consultation with the Local Education Authorities. Again, given the funding arrangements, the GLA would have to consider partners for this.

Representation

- Proposals for grass-roots initiatives should be strengthened, with more emphasis on smaller and more local groups.
- Commitment should be made to issue new and strongly worded guidance to boroughs on the formulation of biodiversity policies.

The Assembly believes that with these amendments, together with the secondary amendments recommended in this report, the Mayor's Biodiversity Strategy will be capable of delivering measurable improvements in the extent and quality of appropriate biodiversity in London.

The Assembly is grateful for the time and effort devoted by the witnesses who submitted evidence and by officers at the Greater London Authority, and for the support provided by its consultants, Nicholas Pearson Associates.

1.0 Aims of the scrutiny

This report presents the results of careful scrutiny of the Mayor's Biodiversity Draft Strategy for London ("the Strategy"). The report is intended to provide constructive criticism of the Strategy, and assist the Mayor in making the Strategy:

- Accurate in fact;
- Complete and clear in its coverage of the issues;
- Adequate in provision of all necessary evidence in support of any contentions made;
- Presenting only what are appropriate goals and relevant statements;
- Realistic in its goals. Are the goals sensible? Can the objectives be achieved given adequate resources? Are adequate resources likely to be found?
- Representative of the wishes of the population of the Capital;
- Possible to Resource. Are both the scale and sources of the resources likely to be required identified? Have goals and priorities been prioritised in relation to the resources likely to be available?
- Visionary. Do the proposals of the strategy take us forward into the 21st century with goals, new ideas and techniques to implement them?
- Bearing a clear relationship to National and London Biodiversity Action Plans. The Strategy must give detail of the relationship with these Biodiversity Action Plans and state the current limitations of the London Biodiversity Action Plan as a delivery mechanism for part of the strategy.
- Compatible with other existing strategies. Does the strategy conflict in any obvious way with any preceding strategy documents such as those produced by the Environment Agency?

The London Biodiversity Action Plan ("London BAP") was also reviewed. To the extent to which the London BAP has shortcomings, especially as regards delivery of stated goals, it follows that there are similar shortcomings in the Strategy.

This scrutiny has considered the cross-compatibility between Mayoral strategies, where possible. Attempting to pre-empt any potential conflicts must be a key feature of the Biodiversity Strategy if it is to be considered as a constructive contribution to planning for sustainable development of the Capital. This report notes the types of existing strategies and guidance that need to be reviewed in this way, with some of the major discrepancies of concern highlighted.

The present scrutiny does not constitute a thorough review of the compatibility between the Biodiversity Strategy and other existing strategies and advice; nor compatibility with other draft and emerging strategies from the Mayor's office.

2.0 Structure of this Report

The first section of results (Section 3.1) in the report expands the key issues in the Executive Summary. There is also a brief review of those statements from Sections 1 to 3 of the Strategy that imply policy decisions.

The next section (3.2) deals with issues that, while important, may be considered secondary.

The Committee also received a detailed line-by-line critique, not reproduced here. All points of significance arising from the detailed review have been taken up in this report and it will be made available in full to the Mayor's Office.

Over many years, the former London Ecology Unit has played a vital role in putting nature conservation and biodiversity issues on the Greater London map, and have provided many of the foundations for development of the Strategy. Particularly useful and commendable in the Strategy is the layout of Policies and Proposals, which makes clear the main broad areas of intent of the strategy. The Proposals are reproduced here in Appendix 3, organised under Policies. This exercise revealed a numbering error, and the fact that at least one key Policy was missing.

The Committee believes that the Policies should perhaps be called "Strategic Policies", and the Proposals would be better termed "Operational Policies". The concept of Proposals seems inappropriate since they often only provide more detail on what are termed Policies. Alternatively, the wording of the policies could be altered so that they are not phrased as statements of obligation or opinion, for example, "The Mayor should" or "the Mayor supports", but rather as statements of *intent* such as "the Mayor will".

This report only occasionally suggests alternative text for inclusion in the Strategy. Amending the Strategy is a matter for its authors. Some constructive suggestions for possible improvement are included, with examples by way of illustration and useful references to suggest possible alternative wordings where appropriate.

3.0 Results of Scrutiny

The main aims of the commentary and recommendations in this section are to assist the authors to make the Strategy even more accurate and complete, to enable it to provide greater guidance to key sectors and to clarify issues of funding.

3.1 Principal Recommendations

3.1.1 To Improve the Vision

Direction for the future provided in the Mayor's draft Biodiversity Strategy appears to have been partly constrained by the time available to produce it and, perhaps, the experiences of the past. Many proposals are over-generalised in their scope. As a consequence, the Strategy is not sufficiently visionary, bold or focused and does not provide all of the guidance that is needed in light of the ever-increasing development pressures in Greater London. Specifically, in its present form, the Strategy will not provide the lead that it could provide, to aid formulation of the (statutory) Spatial Development Strategy, a strategy that will have a profound influence on biodiversity in the Capital.

The Committee concluded that the vision encompassed in the Strategy could be improved by:

- a) defining an overall vision;
- b) clarifying the funding options and setting up a business plan;
- c) working with the LEAs to add a policy on education;
- d) giving guidance on brownfield sites;
- e) achieving consistency with the other Mayoral Strategies;
- f) drawing more widely on examples.

(a) Defining an overall vision

There is a need to define an overall vision through bold, but potentially achievable and quantifiable, targets for the promotion of biodiversity in Greater London over the next decade, with associated time-scales, probabilities of success, and a detailed, unifying, strategic map, all linked explicitly to the London Biodiversity Action Plan.

There is an opportunity for the present Strategy, via the Spatial Development Strategy, to support the statutory requirement on the Boroughs to implement the Biodiversity Action Plan. The Strategy at present lacks a preamble section that explains clearly the whole background to Strategy Development by the Mayor's department, and how the Biodiversity Strategy fits in. Generally, the targets for habitats and species in the London Biodiversity Action Plan should be brought into the Strategy itself for habitats, species and connections between them, but with further consideration of likely changes in species distribution with climate change.

The vision set by the Biodiversity Strategy should inform, rather than react to, the emerging Spatial Development Strategy, and do this in more ways than by the identification of sites that are important for biodiversity at present. Habitat areas and links that may seem impossible to make may become possible via the redevelopment of built form or the installation of habitats on existing built form. The targets given in the Strategy should be expanded to include specific targets related to increasing biodiversity everywhere (not just accessible biodiversity in Areas of Deficiency). Consideration, for example, could perhaps be given to large-scale visionary programmes such as the development of large areas of short-rotation willow coppice, linked to the use of waterways as transport networks and the development of Combined Heat and Power facilities. The vision will also need to prioritise, for example, between preservation of different resources such as public open space and brownfield sites and should ideally be summarised in map form. This summary needs to be informed by other strategies and initiatives in the Capital, such as those of the Environment Agency.

It may be that there has been insufficient time and resources available to produce such a vision since the Mayor took office. Such constraints, however, cannot ultimately be used as a rationale for not producing the sort of Strategy that is required.

Finally, further (and more accurately represented) evidence is required to support the assertions regarding potential benefits of Strategy implementation to people. The statements that are made about benefits, especially as regards effects on human health and well-being are not always an accurate reflection of the current scientific evidence available. Contradictions in evidence, for example with respect to the value of urban trees in air quality and filtering of particulates, need to be addressed. It is essential that the Strategy should provide as much detail as possible on the rationale for biodiversity preservation, but without overstating the evidence and thereby bringing valid evidence into doubt. The authors of the present scrutiny believe that there is still a major task involved in converting those who are exerting the greatest effects on Greater London's biodiversity resource to really understand and care about its preservation.

(b) The need for a business plan

The funding options are diverse and complex. The Strategy should provide best estimates of resource targets from each option, for each policy and proposal. A serious attempt at budget forecasting and financial target fixing is required, and this should take the form of a detailed business plan. Funding the implementation of the Strategy should be more explicitly linked to funding of the implementation of the London Biodiversity Action Plan.

It is recognised that the financial resources of the Mayor and the areas over which he exerts direct control are limited. There is, however, definite scope for a fuller and more frank discussion of funding. Discussion of the likely contributions of The London Development Agency, the Single Regeneration Budget, the National Lottery, European funds, statutory agencies and charities, indirect funding from the Police, the regeneration and business sector should be included. A serious attempt at budget forecasting and target fixing is required.

(c) A stand-alone policy on Education

A stand-alone policy on education would be useful, as would provision of the Biodiversity Strategy with a greatly expanded list of proposed initiatives. Further options for new educational initiatives could include many in relation to the water environment and involve many of the established institutions that are concerned with biodiversity issues. Partnership working will be crucial here, the principal partners being the LEAs.

(d) Guidance regarding brownfield sites

Brownfield site preservation needs to be considered in detail in the light of extreme and increasing development pressures and the emphasis on redevelopment of such sites set by the Urban White Paper. The Strategy needs to indicate tests for selection of development sites, networks, connected populations, and the management of natural succession, public image and accessibility. There needs to be a site-specific analysis, acknowledging development pressures and the recreatability of the habitat, a property that will differ between sites. Which sites should be retained and which developed? How should retained sites be managed so as to become more aesthetically acceptable to, and (where appropriate) accessible by, the majority of Londoners?

These points would be addressed, if not with adequate reference to redevelopment needs, by adoption of the initiatives proposed in the London Biodiversity Action Plan. It is noted from Volume 2 of the London Biodiversity Action Plan that there is an Objective '*To map the distribution of wasteland in London and identify key locations and sites*', the aim being to have input all such data into a GIS by the end of 2001. The present authors believe that, even if an interim Biodiversity Strategy is produced in the near future, it will only be of major use once this data collation exercise has been completed and the results can be input to the creation of a strategic map showing the vision for the future. Mention is also made in Volume 2 of the London Biodiversity Action Plan (LBAP) of the establishment of a *London Brownfields Forum*. Mention should also be made of this Forum, its composition and remit, in the Biodiversity Strategy. Objective 5 within the section on Wasteland Communities in the LBAP refers to the '*enabling of communities on existing structures*'. This does not go far enough. Opportunities should also be explored on securing opportunities for the establishment of vegetation, including characteristic and uncommon plants on new roof spaces.

(e) Consistency between aims in the Biodiversity Strategy

Much greater recognition is required of the nature and scale of the many likely conflicts between biodiversity preservation and enhancement and the many other public aspirations in Greater London as set out in other Strategies being produced by the Mayor. Possible means of resolving these conflicts need to be directly addressed as site-specifically as possible.

Conflicts that have emerged as potentially most important from the scrutiny include:

- the conflict between preservation of the brownfield site resource and development/regeneration pressures (especially in light of the Urban White Paper);
- conflicts between brownfield site preservation and public amenity (many such sites are either inaccessible or dangerous or both);
- conflicts between maintenance of brownfield site value in the face of habitat succession and lack of funds for management;
- conflicts at borough level over deployment of scarce resources, poorest Boroughs putting least into habitat creation and management;
- conflicts between increased (and ever-increasing) public access and preservation of sensitive habitats and species;
- conflicts between ensuring total public safety and creating meaningful habitat at pedestrian level;
- conflicts between development pressures and the establishment of new accessible riparian habitats especially along the Thames;
- conflicts between restoration of allotments and the biodiversity value of abandoned allotments;
- conflicts between expansion of the number of City Farms and pressure on other (including brownfield) habitats;
- conflicts between preservation of the cumulative resource of urban gardens and commercial 'backland' development;
- conflicts between preservation of green belt areas poor in native biodiversity and biodiverse derelict sites in the inner city;
- conflicts between unplanned development and conservation of areas of high biodiversity in parts of Greater London's farmland; and
- conflicts between use of urban sites to grow food and risk of contamination.

(f) Draw more widely on examples

In all of the above, the Strategy would be much improved if it drew more overtly on the results of research and best practice from the rest of Britain, Northern Europe and beyond, citing examples and case studies where appropriate. The more innovative and large-scale habitat creation programmes, especially, for example, in relation to green roof establishment in some German cities would be of particular relevance to the 'vision' for Greater London in the drive for regeneration.

3.1.2 To improve the way the vision can be turned into reality

Having established a clear vision, the Committee recommends that the next steps should be to:

- a) set priorities, as part of a detailed business plan;
- b) reconsider the lead partners;
- c) strengthen the role of local communities;
- d) increase the role of habitat creation;
- e) tackle funding issues;
- f) produce new guidance incorporating case studies of best practice.

(a) Set priorities

There needs to be clear prioritisation of the aims of the Strategy in the face of likely resource limitations over different time-scales. It would be useful to assign probability levels to the achievement of given proposals on some ordinal scale, in the face not only of resource limitations, but also the limitations on the direct power of the Mayor. Areas of opinion over which the Mayor has no direct (or immediate indirect) influence in Greater London should be omitted from the Strategy.

(b) Reconsider lead partners for Initiatives

The number of proposals for which the Greater London Authority is quoted as key partner may need to be reconsidered. Other agencies may be better placed (and indeed many are already involved) in progressing particular initiatives. The burden of work on a lead partner is considerable and there must be a clear matching of the resources of time and money available and the number and nature of initiatives for which the GLA is proposed in this role.

(c) Strengthen the role of local communities

Proposals for grass-roots initiatives in the Strategy should be strengthened. The emphasis on assisting smaller and more local groups and organisations in practical ways in helping them to realise the aims of the Biodiversity Strategy needs to be increased. Small funds, advice groups, and possibly a Mediation Body to permit useful dialogue between such groups and developers should be explored. More detailed proposals should be provided on practical ways of increasing voluntary sector recruitment and the involvement of ethnic minorities in biodiversity issues. These could include:

- targeting culturally trained workers for training in biodiversity awareness;
- emphasis on general skill acquisition and on the potential creative elements of biodiversity work;
- building community spirit;

- greater emphasis on cultural gardens to engender appreciation of global biodiversity; and
- public approbation by the Mayor of the achievements of both the formal voluntary sector and local community groups.

The Strategy should also include specific initiatives that could forward the aims of the Strategy to the benefit of the homeless.

(d) Increase the role of habitat creation

As part of the overall visionary plan for biodiversity in Greater London, much greater emphasis in the Strategy needs to be put on innovative, well-planned, well-executed and maintained habitat creation linked to biodiversity and human amenity targets. Such habitat creation may be within existing development or in the areas of landscape or on built form in new developments. There should be a specific proposal for research into novel and valuable habitat creation techniques for key species, especially on the roof spaces, perhaps assisted by consultancies working for developers.

(e) Tackle funding issues

Greater emphasis needs to be placed on recognising and tackling the serious under-funding of management of many both new and existing habitats and public spaces and amenity management in the capital. The Strategy needs to propose innovative and bold solutions, and to quantify their likely financial contributions to solving these problems. Greater emphasis is needed on securing the provision of funds for long-term management and aftercare of newly-created habitats. Boroughs are important partners in this strategic work.

Further guidance is required on how the problem of management and aftercare, both of public spaces and those created in *new* developments, should be addressed.

(f) Produce new guidance

Produce, and widely and actively disseminate, new guidance on best practice and the Mayor's expectations in relation to biodiversity preservation and enhancement. Guidance should be separately tailored for:

- the Boroughs
- the development and construction sectors, including masterplanners, architects, landscape architects and engineers.

Boroughs

The guidance provided to the Boroughs by the London Ecology Unit, Countryside Commission, English Nature and London Wildlife Trust in the document Green Capital (Countryside Commission 1991) on the formulation of policies on biodiversity needs to be revised and strengthened in the light of the new issues raised by biodiversity action planning and the present scrutiny.

The considerable problems faced at borough level in relation to the protection and incorporation of biodiversity, in the context of the planning system, need special discussion and review within the Strategy. The Mayor, in partnership with the ALG and the Boroughs, should promote the employment of at least one qualified ecologist per borough, and the incorporation of all of the aims of the Strategy within borough planning policies. The Strategy should guide Boroughs to include proposals to consider and protect not only species listed in Biodiversity Action Plans, but also all those cited on the many lists of conservation concern, which should be prepared and disseminated by the GLA. Random auditing of the planning procedures of different boroughs, perhaps via case studies, should be introduced to highlight weaknesses in delivery of the aims of the Strategy, and to apply public censure if necessary. The way in which Mayor and his staff will attempt to ensure that proper consideration of biodiversity in planning applications that do not affect sites of less than Metropolitan Importance should be clarified.

Development Sector

Further guidance is required for developers, the construction sector and existing commercial concerns to understand what is expected of them. Many more possible incentives (including financial incentives) as well as penalties for these sectors to encourage compliance with the Strategy should be addressed. Guidance needs to consider the many development-related parameters including location, size, capital value, built form, transport implications, waste production and pollution emission characteristics. The cumulative value of biodiversity initiatives in *all* planning applications should be emphasised, not merely in the larger ones. The guidance needs to be tied in closely to the London Biodiversity Action Plan targets, and there should be a requirement for monitoring. The guidance needs to address the issues of habitat creation and problems of translocation. Ways of increasing the involvement in, and care of, the urban biodiversity resource by employees in Greater London's business community should be further explored.

It would be very useful if case studies of best practice for, for example, land management, habitat creation and funding, with special emphasis on relevance to the commercial and development sectors, could be appended to this guidance.

3.2 Secondary Issues Raised by the Scrutiny

3.2.1 Relationships with other documents

The relationships among the Biodiversity Strategy, the Spatial Development Strategy, the London Biodiversity Action Plan, the National Biodiversity Action Plan and the various Local (Borough and Statutory Agency) Biodiversity Action Plans needs to be stated clearly at the outset of the Strategy. The part played by other documents in the delivery of the Strategy (which therefore become essentially part of the Strategy) should be clarified at the outset. Mention should be made of other relevant recent legislation apart from the Greater London Authority Act, including the Countryside and Rights of Way Act (2000).

3.2.2 Policy, Criteria and Procedures for Identifying Nature Conservation Sites in London

The system for recognising sites of nature conservation value in Greater London should be amended in the context of the present scrutiny, any shortcomings of current survey data emphasised, and the principle of precaution in terms of the value categories assigned as being minimum values subject to further survey, should be included.

3.2.3 Site Protection

Although Greater London has a valuable system for the evaluation and protection of sites of biodiversity importance, the system has shortcomings that are not acknowledged in the Strategy. A few sites of considerable biodiversity importance, especially in the Boroughs that did not contribute funds to the former London Ecology Unit, are not yet protected by any site designation. The system for identification of the value of sites is biased towards plant communities and habitats. There are notable shortcomings on the information available with respect to other groups, especially invertebrates. These problems should be quantified in the Strategy and the intention to address them stated more specifically. In the meantime the Strategy should invoke the Precautionary Principle in relation to the values put on urban sites of potential biodiversity importance.

The existing system of site designation could be usefully modified to distinguish sites of intrinsic biodiversity value, from those sites designated more for public amenity uses. There is call for even greater protection for sites of local community value (such as community gardens), but their value needs to be distinguished qualitatively and quantitatively from sites richer in valued biodiversity.

'Areas of Deficiency' could be usefully re-termed 'Areas of Access Deficiency', since many existing or former Areas of Deficiency contain(ed) extensive biodiverse but publicly inaccessible brownfield, industrial or transport land (for example the Greenwich Peninsula before redevelopment).

Wording of policies to promote appropriate biodiversity in relation to Greater London 's 'Green Spaces' that are largely water (waterways, watercourses and lakes) should be strengthened throughout the Strategy.

Within site protection, mention should be made of the need for heritage protection, especially of historic landscapes and views.

The guidance entitled *'Policy, Criteria and Procedures for Identifying Nature Conservation Sites in London'* should perhaps be renamed *'Policy, Criteria and Procedures for Identifying Site of Biodiversity Importance in Greater London'*.

3.2.4 Species Appropriateness and Invasive Species

Further guidance needs to be given in the Strategy on the subject of 'species-appropriateness' and 'balance' in relation to species preservation. How, for example, is emphasis on domestic and approachable animals through promotion of city farms compatible with the great depredations on the capital's wildlife caused by domestic and feral cats?

The draft Strategy should recognise the problems of invasive species and describe the ways in which the Greater London Authority proposes to assist in combating the problems they create. A useful discussion of this issue as regards plants is provided in Volume 2 of the London Biodiversity Action Plan (by David Bevan) in the section entitled 'London's Exotic Flora'. Monitoring should be emphasised as the key to the early determination of when species start to become problematic.

3.2.5 The Genetically Modified Organism Debate

The statements in the Strategy on Genetically Modified Organisms should be revisited. A more balanced argument is possible and should be presented.

3.2.6 Survey

The remit for survey should be extended to more species groups, especially invertebrates. The Environment Agency and English Nature should be named as key partners in the rolling survey programme.

3.2.7 London Biodiversity Records Centre

Further detail should be provided in relation to the proposed London Biodiversity Records Centre to provide assurances in relation to the relationship to existing guidance and initiatives, data ownership, the need for independent and impartial status with unrestricted data access and funding priorities.

3.2.8 Examples of London's Biodiversity Resource

The examples chosen to illustrate the value of Greater London 's biodiversity omit many key sites and features. Suggestions are provided in the full appendices (not attached to this document but available on request) to ensure that the examples chosen include more of the most important sites and species. The cumulative value of existing habitats on built form, and to a lesser extent in some urban streets, should also be recognised more clearly in the Strategy.

3.2.9 Hunting with dogs

The committee questions the section on fox hunting with dogs and its relevance to urban life in London. We received no evidence that there was a hunt in London. Although we may agree with the Mayor, the relevance to London is not clear.

3.2.10 Terminology

Semantics and terminology used would benefit from considerable tightening, not out of pedantry, but to ensure the correct understanding of what is required from developers, master-planners, planners, politicians and others, particularly to avoid 'greening' being equated with the creation of 'green deserts' as is so often the case. The Mayor's Strategy is an opportunity to rethink the use of terminology and achieve more accurate conveyance of meaning.

APPENDIX I

External witnesses

The Committee received evidence, provided either directly or in writing, from the following organisations and individuals:

- English Nature (Mathew Frith)
- The London Forum of Amenity Societies (Marion Harvey)
- The Ecologist for the London Borough of Haringey and Conservation Officer for the London Natural History Society (David Bevan)
- The Black Environment Network (Adam Brown)
- St Mungo's Charity for the Homeless (Charles Frazer)
- Mr Duncan Innes (leading practitioner in planning and regeneration in London)
- Environment Agency (Jessy Simmance)
- The London Wildlife Trust (Ralph Gaines)
- The Bankside Open Spaces Trust (Vicky Lawrence)

An evidential hearing with the Mayor and his advisors on 13 March 2001 also informed this scrutiny.

Appendix II

Nicholas Pearson Associates Scrutiny Team

Authors:

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Contributors:

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Appendix III

List of Policies and Proposals in the Draft Biodiversity Strategy

Policy 1: Protection of Habitats and Species

POLICY 1: THE MAYOR WILL PROMOTE THE PROTECTION OF LONDON'S WILDLIFE HABITATS AND IMPORTANT SPECIES.

PROPOSAL 1: Measures in the Mayor's Spatial Development Strategy will protect important wildlife sites. They will also include policies to create, enhance and manage natural green space, protect important species, and promote public access to nature. The SDS policies on the development of brown-field land will follow a balanced approach.

PROPOSAL 2: The London borough councils should adopt the procedures and criteria set out in Appendix 1 to identify wildlife sites to be protected in their Unitary Development Plans.

PROPOSAL 3: Unitary Development Plan policies must conform with the guidance of the SDS and should also take up the priorities set by relevant local biodiversity action plans.

PROPOSAL 4: In consultation with other expert groups, the Mayor will produce model policies for biodiversity conservation to assist London borough councils with this aspect of their Unitary Development Plans.

PROPOSAL 5: The Mayor will take biodiversity issues into account in the consideration of planning referrals wherever relevant.

PROPOSAL 6: The Mayor will press the Government to bring Sites of Metropolitan Importance for Nature Conservation into the criteria for Mayoral planning referrals.

PROPOSAL 7: The Mayor will provide expert advice on biodiversity to London borough councils on other planning issues, which could have strategically important consequences for biodiversity.

PROPOSAL 8: The Mayor will encourage the Metropolitan Police Authority to ensure that species protection legislation is enforced in London, working in conjunction with English Nature.

PROPOSAL 9: The Mayor fully supports legislation to ban all hunting with dogs, including hare coursing and fox hunting.

PROPOSAL 10: The Mayor will aim to survey all open spaces and wildlife habitats throughout London on a ten year rolling programme, and employ the adopted procedures for evaluating open land to complete the identification of important wildlife sites throughout London and keep this series updated.

PROPOSAL 11: The Mayor will encourage the GLA's Functional Bodies to undertake surveys of biodiversity on their land holdings.

PROPOSAL 12: The Mayor will co-operate with the London Biodiversity Partnership and other relevant bodies in promoting the effective monitoring of animals and plants in London and will support the establishment of a London Biological Records Centre.

Policy 2: Management and enhancement for biodiversity and people, and expanding the volunteer workforce

POLICY 2: THE MAYOR WILL ENCOURAGE AND PROMOTE THE MANAGEMENT, ENHANCEMENT AND CREATION OF VALUABLE GREEN SPACE TO ALLOW IMPORTANT SPECIES TO THRIVE AND TO PROMOTE PUBLIC ACCESS AND APPRECIATION OF NATURE.

PROPOSAL 13: The Mayor will encourage land managers, including London borough councils and other public bodies, schools and commercial organisations, to take biodiversity into account in the management of their land. This should include managing important habitats to protect and enhance their nature conservation value, providing safe access for all, involving the local community and creating new wildlife habitats where appropriate.

PROPOSAL 14: The Mayor will provide expert advice to London borough councils on the management of strategically important wildlife sites and important species. The Mayor will also provide advice and training on the management, creation and enhancement of wildlife habitat.

PROPOSAL 15: The Mayor believes there needs to be an expansion of the local volunteer task force in London. He will work with existing voluntary organisations to help expand their active membership to protect and manage local nature sites.

Policy 3: Value of the Thames and its surroundings

POLICY 3: *THE MAYOR RECOGNISES THE UNIQUE ROLE OF THE RIVER THAMES IN LONDON'S HISTORY AND IN THE LIVES OF LONDONERS, AND ITS VALUE FOR TRANSPORT, RECREATION AND BIODIVERSITY. THE RIVER AND ITS IMMEDIATE SURROUNDS WILL BE DESIGNATED AS A BLUE RIBBON ZONE IN RECOGNITION OF THIS SPECIAL IMPORTANCE.*

PROPOSAL 16: The Mayor's strategy for the River Thames and London's waterways will ensure that biodiversity is protected. This will include measures to discourage further encroachment into the tideway of non river-related development. It will also encourage the retreat of flood defences where appropriate and the creation of riverside habitat, and promote equal access for all people to enjoy and use the river while minimising disturbance to sensitive wildlife.

PROPOSAL 17: The Mayor's strategy for the River Thames and waterways will contain measures to protect and enhance the biodiversity of London's canals, their towpaths and associated open land.

PROPOSAL 18: The Mayor will encourage and assist the Environment Agency, London borough councils and other partners in developing a strategy and programme to restore wildlife habitats where appropriate along London's rivers.

Policy 4: Policies for biodiversity promotion within development, promoting benefits of open spaces and enhancing biodiversity in open space

POLICY 4: THE MAYOR WILL SEEK TO ENSURE THAT EVERY OPPORTUNITY IS TAKEN TO INCREASE ACCESS TO NATURAL GREEN SPACES, TO GREEN THE BUILT ENVIRONMENT WITHIN DEVELOPMENT PROPOSALS AND TO USE OPEN SPACES IN ECOLOGICALLY SENSITIVE WAYS. THIS IS PARTICULARLY IMPORTANT IN AREAS DEFICIENT IN OPEN SPACES AND IN AREAS WITH DEPRIVED COMMUNITIES.

PROPOSAL 19: The Mayor's Spatial Development Strategy will include policies to encourage greening within new developments.

PROPOSAL 20: The Mayor will work with the London Development Agency and the London borough councils to encourage the inclusion of greening initiatives in major new developments, and proposes that these should be addressed from the outset in developing such schemes.

PROPOSAL 21: The Mayor will encourage the London Health Commission to consider the benefits of open spaces and contact with nature for the health of Londoners and make recommendations for appropriate action.

PROPOSAL 22: A strategy for London's trees and woodlands will be prepared by a partnership between the Mayor and other relevant bodies, including Trees for London, the London borough councils, the London Tree Officers Association, the Community Forests, Thames Gateway Urban Forestry Strategy and the Forestry Commission.

PROPOSAL 23: The Mayor will review the available information on air quality and trees.

PROPOSAL 24: The Mayor will encourage London borough councils to produce open space strategies, which should include proposals for enhancing their open spaces for biodiversity.

PROPOSAL 25: The Mayor will work in partnership with Learning Through Landscapes and other partners to investigate the potential to increase the biodiversity value of school grounds.

PROPOSAL 26: The Mayor will encourage Transport for London, the Highways Agency, Railtrack, the borough councils and other transport bodies to ensure that the potential for wildlife habitat on the verges of roads, footpaths, cycleways and railways is realised wherever possible.

PROPOSAL 27: The Mayor will promote the important role of private gardens for wildlife and, together with other members of the London Biodiversity Partnership, will provide information to encourage London's gardeners to make their gardens wildlife-friendly. This will include the production of a booklet on wildlife gardening in London.

PROPOSAL 28: Measures in the Mayor's Spatial Development Strategy will recognise the importance of allotments and ensure that a balanced view is taken of development of allotment sites. Allotments should be safeguarded where demand is greatest and particularly in areas deficient in open space.

Policy 5: Promoting 'other' sites for public access to biodiversity

POLICY 5: *LONDONERS SHOULD HAVE LOCAL OPPORTUNITIES FOR REGULAR DIRECT CONTACT WITH THE NATURAL WORLD, THROUGH ALLOTMENTS, COMMUNITY GARDENS, SCHOOL GROUNDS, ENVIRONMENTAL EDUCATION CENTRES AND CITY FARMS.*

PROPOSAL 29: The Mayor, together with the London borough councils, city farms, community and voluntary groups and the London Environmental Education Forum will develop proposals which seek to enhance the provision of environmental education centres, city farms and environmental outreach programmes throughout London.

PROPOSAL 30: The Mayor will work with London borough councils, schools, Learning Through Landscapes and other groups to encourage school children to take an active interest in their local green spaces.

PROPOSAL 31: The Mayor will work with the London borough councils, the Royal Parks and others to facilitate information exchange on best practice in enhancing the biodiversity value of parks without compromising other uses of parks.

PROPOSAL 32: Measures in the Mayor's Spatial Development Strategy will recognise the importance of London's cemeteries for biodiversity, and take a balanced view on the re-use of burial space.

PROPOSAL 33: The Mayor will encourage the establishment of nature areas in cemeteries wherever there are opportunities for enhancements such as wildflower meadows or butterfly gardens.

Policy 6: **Support for 'agri-environment' and other similar schemes**

POLICY 6: *THE MAYOR WILL SUPPORT AND ENCOURAGE THE USE OF AGRI-ENVIRONMENT AND OTHER SCHEMES THAT ENHANCE LONDON'S FARMLAND BIODIVERSITY.*

Policy 7: Opposition to Genetically Modified Organisms

POLICY 7: THE MAYOR WILL OPPOSE COMMERCIAL OR EXPERIMENTAL RELEASE OF GENETICALLY MODIFIED ORGANISMS (GMOS) INTO THE ENVIRONMENT IN LONDON.

Stand-alone Proposal: Passport to Nature for Schoolchildren

PROPOSAL 34: THE MAYOR WILL DEVELOP A SCHEME TO SPONSOR A FREE VISIT TO LONDON ZOO FOR ALL CHILDREN IN LONDON SCHOOLS, AND WILL WORK WITH THE DEPARTMENT FOR EDUCATION AND EMPLOYMENT, LONDON'S EDUCATION AUTHORITIES, LONDON'S OTHER CENTRES OF EXCELLENCE AND CITY FARMS TO DEVELOP A 'PASSPORT TO NATURE' FOR LONDON'S SCHOOLCHILDREN.

Policy 8: Celebration of Biodiversity

POLICY 8: LONDON'S MANY SPECIES, AND THE LANDSCAPES WHERE THEY ARE FOUND, SHOULD BE CELEBRATED AND PROMOTED.

PROPOSAL 35: The Mayor will encourage and facilitate research and projects which seek to raise awareness of the relevance of biodiversity to Londoners' lives and health. Through its public consultation programmes, the Authority will obtain baseline information on Londoners' attitudes to biodiversity and seek ways to make biodiversity more interesting and accessible to people from all sectors of London society.

PROPOSAL 36: The Mayor will promote positive news about biodiversity and events where biodiversity can be enjoyed, and will help to dispel common myths about wildlife.

PROPOSAL 37: The Mayor's Culture Strategy will consider Londoners' cultural traditions in relation to open spaces and nature where relevant to major cultural events.

PROPOSAL 38: The Mayor will publish information about London's biodiversity, including a popular guide to exploring London's wildlife.

PROPOSAL 39: The Mayor will work with the London borough councils and other landowners to promote an annual 'London Wildlife Day (or week)', when land managers will be encouraged to organise events, and Londoners, including school groups, will be encouraged to visit and discover their local wild open spaces.

PROPOSAL 40: The Mayor will facilitate best practice for developing safe and enjoyable access to nature, through work with stakeholder groups, including training, information exchange and introduction of equality monitoring.

PROPOSAL 41: The Mayor is minded to commission a team of interpretation specialists in order to improve visitor experiences and access requirements at a number of key wildlife sites.

**Policy 9: (first; N.B. there are two policies numbered 9 in the draft):
Role of the Business Community**

POLICY 9:(first) THE MAYOR WILL ENCOURAGE THE BUSINESS COMMUNITY TO PLAY A MAJOR ROLE IN IMPLEMENTING THE PROGRAMME FOR CONSERVING LONDON'S BIODIVERSITY.

PROPOSAL 42: The Mayor will work with the London Chamber of Commerce and Industry, CBI, London First and other organisations to strengthen the role which business can play in conserving London's biodiversity.

PROPOSAL 43: The Mayor is minded to implement an 'Environmental Business Marque', awarded to businesses meeting set environmental standards relating to air quality, biodiversity, ambient noise, waste and energy use.

PROPOSAL 44: The Mayor will work with the London Tourist Board and others to raise the profile of London's major natural attractions.

PROPOSAL 45: The Mayor will encourage the London Development Agency to commission a study of employment related to the green economy in London. This should include investigation of current training available in this field, and how to make employment in the green sector more attractive to people from minority groups. Proposals on these issues should be incorporated into future revisions of the Economic Development Strategy.

Policy 9 (second) (N.B. there are two policies numbered 9 in the draft):
London's Reputation for Biodiversity and Exchange of Experience

POLICY 9 (second): THE MAYOR WILL PROMOTE THE REPUTATION OF LONDON AS A WORLD CENTRE OF EXCELLENCE FOR BIODIVERSITY CONSERVATION, WORKING WITH LONDON'S WORLD-CLASS ORGANISATIONS FOR GREATER INFLUENCE GLOBALLY AND TO LEARN FROM EXEMPLARY EXPERIENCE ABROAD.

PROPOSAL 46: The Mayor will foster working links and exchanges with international bodies and organisations in other major cities, to give a lead in urban greening and biodiversity conservation.

PROPOSAL 47: The Mayor will support enterprising new flagship projects for urban nature conservation and people's enjoyment of the natural world, which may further London's reputation as a World City.

PROPOSAL 48: The Mayor will encourage the formation of a partnership for excellence in global biodiversity conservation, harnessing the skills and expertise of London's centres of excellence.

Policy 10: Monitoring the Strategy's Progress

POLICY 10: PROGRESS IN CONSERVING LONDON'S BIODIVERSITY SHOULD BE MEASURED WITH PARTICULAR REFERENCE TO THE STATUS OF IMPORTANT SPECIES AND HABITATS, AND PROGRESS ON PROPOSED ACTIONS OR TARGETS.

PROPOSAL 49: The Mayor will compile State of the Environment Indicators, which will include headline indicators on bird populations (and other appropriate groups where possible), quantity of wildlife habitats, access to natural green spaces and the quality of that access.

PROPOSAL 50: The Mayor will encourage the London Wildlife Trust and the London Natural History Society to co-ordinate the efforts of London's amateur naturalists and others to collect information on the status of London's animals and plants, and to work with English Nature towards establishing a Biological Records Centre for London.

PROPOSAL 51: The Mayor will develop, with other partners, methods for monitoring the progress of actions contained in the London Biodiversity Action Plan and the biodiversity action plans adopted by individual London boroughs, in order that such data can be readily combined to provide information for London as a whole.

PROPOSAL 52: The Mayor will measure the success of this Strategy against two targets, to ensure:

- that there is no net loss of important wildlife habitat, and*
- that a net reduction is achieved in the Areas of Deficiency in accessible wildlife sites.*

Policy 11: Reducing London's wider biodiversity impact

POLICY 11: *THE MAYOR WILL ENCOURAGE PRACTICES THAT REDUCE LONDON'S IMPACT ON BIODIVERSITY ELSEWHERE.*

PROPOSAL 53: The Mayor will consider, with the London Development Agency, the development of a strategy for ethical trade, to discourage trading activity that damages biodiversity beyond London's borders, including such issues as the use of peat, limestone and wood products from unsustainable sources.

PROPOSAL 54: The procurement policies of the GLA 'family' should pay due regard to biodiversity conservation. The Mayor's Spatial Development Strategy will encourage sustainable procurement of materials used in construction and development.

PROPOSAL 55: the mayor will encourage the metropolitan police authority to work with HM customs and others, to develop an effective programme to prevent the illegal trade in endangered species and species products within London.

Policy 12: Partnerships for Implementation

POLICY 12: *THE MAYOR SUPPORTS THE ESTABLISHMENT AND MAINTENANCE OF PARTNERSHIPS AT LONDON-WIDE AND LOCAL LEVELS TO PRODUCE AND IMPLEMENT BIODIVERSITY ACTION PLANS.*

PROPOSAL 56: The Mayor will continue to be an active member of the London Biodiversity Partnership and will assist in providing facilities for the Partnership's co-ordinating staff.

PROPOSAL 57: The Mayor will take the lead on the production and implementation of action plans for London's woodlands and for the house sparrow, and will contribute to other action plans as appropriate.

PROPOSAL 58: The Mayor will work with members of the London Biodiversity Partnership and others to establish a stakeholder forum to facilitate the implementation of the Biodiversity Strategy.

PROPOSAL 59: The Mayor will encourage and support all London borough councils in the establishment of local biodiversity partnerships and the production and implementation of borough biodiversity action plans.

PROPOSAL 60: The Mayor will press the Government for legislation to place a statutory duty on local authorities to produce and implement local biodiversity action plans through local partnerships.

Policy 13: Funding for Biodiversity Projects and provision for biodiversity in development

POLICY 13 THE MAYOR WILL USE HIS INFLUENCE TO SEEK INCREASED FUNDING FOR BIODIVERSITY PROJECTS IN LONDON, AND TO ENSURE THAT MAJOR NEW PROJECTS INCLUDE PROVISION FOR BIODIVERSITY.

PROPOSAL 61: The Mayor will seek to establish a strategic programme of funding for site acquisition and management to conserve strategically important land for biodiversity and for the enjoyment of nature by people.

PROPOSAL 62: The Mayor will lead a bid for Heritage Lottery funding in conjunction with the Federation of City Farms and Community Gardens to support and expand London's network of city farms.

PROPOSAL 63: The Mayor will explore with funding agencies possibilities for making grant schemes more attractive to potential applicants, for a wider range of work and more appropriate to the special conditions in London.

PROPOSAL 64: The GLA 'family' should ensure that the budgets for major infrastructure and development projects include provision for the necessary environmental appraisal (including a biodiversity assessment where appropriate) and for retention, enhancement and creation (where appropriate) of wildlife habitat.