

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

London Assembly
City Hall
The Queen's Walk
London, SE1 2AA

12 November 2013

Cc: Matthew
Pencharz, Stephen
Tate, Pete Massini

Dear Boris,

Biodiversity and green infrastructure in London

This autumn, the London Assembly's Environment Committee has been investigating the challenges involved in protecting London's green infrastructure and biodiversity and the need for strategic guidance to support those efforts. As part of our evidence gathering we reviewed the 2002 Mayoral Biodiversity Strategy, which is still current, and conducted a public survey to capture Londoners' views on London's green spaces and biodiversity. Our survey was targeted at Londoners involved in nature and wildlife conservation, 'Friends of parks' groups, conservation volunteers and local societies. We received over 800 responses which highlights the great level of interest in this issue and the high value placed on London's natural green areas and wildlife habitats.

Responses originated from across London with equal numbers from inner and outer London. Over half of the survey participants were of the opinion that London's Boroughs (61%) and the Mayor (56%) are not doing enough to protect and support London's green spaces and biodiversity habitats and that this needs to be improved.

Furthermore, the survey highlighted a number of concerns such as the pressure from development affecting London's green and natural spaces and the lack of maintenance observed in some of London's parks and green spaces. It also drew attention to the positive contribution local communities and London's many volunteer groups are making in this area and to the importance of sensitive management of wildlife habitats. A summary of the key messages from the survey with a sample of representative comments from participants is enclosed as **Appendix 3** to this letter.

On 11 September, the Environment Committee met with invited experts, including Natural England and the London Wildlife Trust, to discuss the Committee's interim findings and gather further information. The Committee then invited written evidence to gain a better understanding of some of the issues raised at the meeting. We wrote to all London Boroughs as well as leading organisations in the sector.

Having considered this additional information, we recommend that you should **produce an update or addendum to the 2002 Biodiversity Strategy**. This should cover the following matters:

- Current Governments objectives;
- Changes to the 'Biodiversity Action Planning' process;
- Latest data and monitoring system;
- Pollinator decline and use of pesticides;
- Increasing development pressures and the planning system;
- Use of GLA land and assets;
- Use of 'Biodiversity Offsetting';
- Progress on the 'All London Green Grid';
- Role of 'Green Infrastructure' and 'Ecosystem Services'; and
- Benefit of a greater biodiversity focus.

Alongside this update, a Mayoral **lead on implementation and guidance** on how custodians of green space, such as local authorities and volunteers, can effectively manage green spaces and enhance London's biodiversity during an austere fiscal climate would be valuable. You should also consider **greater integration of other strategies and objectives** with biodiversity work streams and policies.

Furthermore, there is demand that you should **explicitly recognise the value of London's small private green spaces**, such as back gardens, and pursue efforts to raise awareness among Londoners of how wildlife can be protected and encouraged in them. We would welcome an addition to the Biodiversity Strategy to highlight the important role of private green spaces and that you continue to promote a presumption against back garden development through the London Plan.

The evidence in support of these recommendations and further details are set out in **Appendix 1** to this letter. Furthermore, the full set of written responses is available online at this link: <http://www.london.gov.uk/biodiversity>. We would like to draw your particular attention to the London Wildlife Trust's submission which includes a tabular assessment of progress regarding the 72 proposals in the 2002 Biodiversity Strategy.

The Committee would be very grateful if you could respond to the recommendations set out in this letter by **15 January 2014**, to enable the Committee to note your response at its meeting in February. If an electronic copy of your response could go to the Committee's assistant scrutiny manager Alexandra Beer (alexandra.beer@london.gov.uk) that would be most helpful.

Yours sincerely



Murad Qureshi AM
Chair of the Environment Committee

Appendix 1 – Background to recommendations

The information below is a summary of the comments received from stakeholders as part of our consultation. Whilst many of these comments have informed our recommendations in the letter, not all of the specific statements are necessarily endorsed by the whole Environment Committee.

1. An updated Biodiversity Strategy for London

The Biodiversity Strategy is an important document, as it has some – albeit limited – statutory weight, embedding strategic objectives for conserving nature in London and the GLA. When published it also signified a level of political importance that was placed at that time on protecting biodiversity and making it relevant to the people of London.¹

The Strategy states that: *“No other body is better placed than the Greater London Authority to provide strategic advice and act as an essential catalyst on issues relating to biodiversity conservation in London.”*² Without a lead from the Mayor there is no effective regional body to set the agenda for green infrastructure and biodiversity work for London. Without high-level leadership, work on biodiversity could be increasingly marginalised or diluted as it is absorbed into other local authority functions.³

Evidence to our review finds that much of the content in the 2002 Biodiversity Strategy is still relevant and that its suite of policies and proposals are fundamentally sound and fit for purpose.⁴ However, since the Biodiversity Strategy was drafted, Government thinking around biodiversity and associated economic aspects has shifted and policy has changed while, locally, the implementation of biodiversity policies and action plans can now vary significantly between boroughs.

There have been a number of significant changes to legislation and policy relating to wildlife and the natural environment since 2002 which include, for example, the 2006 Natural Environment & Rural Communities Act (NERC), 2011 Natural Environment White Paper (NEWP) and the 2012 National Planning Policy Framework (NPPF). A full list is included at **Appendix 2** to this letter.

The existing London Biodiversity Strategy risks being side-lined and ignored by decision-makers because so much of it is clearly out of date.⁵ The glossary for example contains none of new terms such as ecosystem services, Payment of Ecosystem (PES) or offsetting which are now common currencies within modern biodiversity strategy documents.⁶

Many London boroughs and many of the organisations involved in protecting and enhancing London’s environment would therefore like to see an update or addendum to the 2002 Biodiversity

¹ Written submission from the London Wildlife Trust

² Written submission from the London Borough of Sutton

³ Written submissions from the London Tree Officers Association and the London Borough of Havering

⁴ Written submissions from the London Borough of Sutton, London Borough of Havering, London Borough of Wandsworth, the Woodland Trust and Forestry Commission

⁵ Written submission from the London Borough of Southwark

⁶ Written submission from the Heritage Lottery Fund

Strategy.⁷ Only a few consider it necessary to carry out a complete revision of the Strategy.⁸ An update or addendum would demonstrate the current Mayor is serious about biodiversity issues in the city, not just the broader topic of 'urban greening' which doesn't cover the 'nature for nature's sake' element of the strategy.⁹

The GLA's Environment Team notes that the Greater London Authority Act 1999 makes no specific requirement to update the Biodiversity Strategy but simply states that the Mayor should keep strategies under review and make such revisions as are necessary if there are significant changes in national policy and/or other Mayoral strategies that would result in the Biodiversity Strategy being inconsistent with the wider policy framework.¹⁰

Any update to the Biodiversity Strategy must recognise the abovementioned important changes in legislation and guidance, as well as changes in the suite of threats and opportunities for biodiversity in the capital, and an increased recognition of the value of nature to people and the economy and the benefits to people of accessing nature. Key strategic partnerships and initiatives should also be referenced.

2. Topics to be addressed in an updated Biodiversity Strategy

The following matters should be covered:

Current Government objectives

The Government's Natural Environment White Paper has shown a step change in the way that biodiversity conservation is delivered. There is a movement away from piecemeal conservation action towards a landscape scale approach to conservation.¹¹

The Government wants to ensure that the intrinsic value of nature, as well as its value in terms of the economic and social benefits that arise from a healthy natural environment, are fully recognised and mainstreamed across society, in terms of policy development and decision making. To help achieve these aims the White Paper introduces a number of new policies and initiatives which should be recognised in the updated Strategy.¹² These include:

- 'Local Nature Partnerships' (LNPs)
- 'Nature Improvement Areas' (NIAs)
- Biodiversity offsetting
- Green Infrastructure Partnerships

⁷ Written submissions from the London Borough of Havering, London Borough of Sutton, London Borough of Ealing, London Tree Officers Association, Greenspace Information in Greater London (GiGL), the London Wildlife Trust, Environment Agency, Natural England, Forestry Commission, Heritage Lottery Fund and Buglife

⁸ Written submissions from the Lee Valley Regional Park Authority and the London Borough of Havering

⁹ Written submissions from Greenspace Information in Greater London (GiGL) and the London Borough of Southwark

¹⁰ Written submission from GLA Environment Team

¹¹ Written submissions from the Lee Valley Regional Park Authority, London Borough of Havering, London Borough of Camden and the Forestry Commission

¹² Written submissions from the London Borough of Havering and the Lee Valley Regional Park Authority

Changes to the 'Biodiversity Action Planning' process

In the last few years the emphasis has shifted away from delivery on nature conservation through the Biodiversity Action Planning process. The economic recession and the contraction in public and civil services has led to a decrease in support on biodiversity issues, including the demise of the GLA's Ecology Unit, the London Biodiversity Partnership and support offered by Natural England making it increasingly difficult to achieve the original ambitions of the Strategy.¹³ The London Borough of Havering notes that the justification for local authorities for having a specific advisor on biodiversity is becoming increasingly marginalised although the need to deliver on statutory requirements such as planning and protected species remains the same.¹⁴

An update to the Biodiversity Strategy that recognises this change in emphasis would help ensure that current 'Environmental Stewardship' agreements continue to be supported and are worthwhile for local authorities to engage with, along with similar or future schemes in the interest of enhancing biodiversity and protecting the environment across London. An addendum to the Strategy should also demonstrate best practice for boroughs, identifying ways they can work collaboratively to maximise biodiversity expertise and achieve practical implementation of the London Plan Targets.¹⁵

Latest data and monitoring system

The following statement taken from the Strategy states 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. This will allow the Mayor to monitor trends in the changes to our habitats".

The decision by the GLA to discontinue the rolling habitat survey has had a big impact on the evidence base used by boroughs and others to deliver their functions (eg to assess the potential impacts of planning proposals). The existing information is now out-of-date without there being an alternative mechanism for collecting it. The GLA should either re-start the surveys, strongly encourage boroughs to run them, or work with suitable partners to find additional funding to undertake this vital function.¹⁶

The 2011 State of the Environment report called 'London's Environment Revealed'¹⁷, jointly produced by the Environment Agency, Natural England, the Forestry Commission and the GLA, highlights the improvements that have been made and the challenges the city faces. The data sets to inform the 2011 report were updated in 2013 and could be used as evidence for an update document to the Mayor's Biodiversity Strategy.¹⁸

According to the London Development Database (LDD) the total loss of 'Open Space Land' over a four year period, between 2009 and 2012 (approved and completed sites) is 215.5 hectares. The most significant loss has been to Metropolitan Open Land (106 ha), followed by green belt (60ha).¹⁹

¹³ Written submissions from the London Borough of Havering, London Borough of Ealing and the Lee Valley Regional Park Authority

¹⁴ Written submission from London Borough of Havering

¹⁵ Written submissions from the London Borough of Ealing and London Borough of Wandsworth

¹⁶ Written submissions from Greenspace Information in Greater London (GiGL), the London Borough of Havering and the Lee Valley Regional Park Authority

¹⁷ <http://data.london.gov.uk/datastore/package/state-environment-report-london>

¹⁸ Written submission from the Environment Agency

¹⁹ Written submissions from the Campaign to Protect Rural England (CPRE) London

There have been declines and extinctions of a variety of species in London (e.g. water vole, song thrush, house sparrow) over the past 50 years. Some of these changes reflect wider declines across the country, others are down to loss of and damage to habitats within London.²⁰

Any review of the Strategy should include a review of what has been achieved since 2002, what remains to be done, any gaps that can be identified, and what is no longer relevant or deliverable.²¹ More specifically, an update could evaluate the progress made on the suite of 72 proposals contained in the Strategy. Most of these proposals are still valid, bar a few details. However, there are too many which are neither prioritised nor weighted. A revised suite of proposals should focus on fewer, more defined, SMART measures that relate to the remit and capacities of GLA family, boroughs and partner organisations.²²

There is no clear mechanism for monitoring the consideration of biodiversity in the planning process or for monitoring the effectiveness of projects, mitigation outcomes, species populations or habitat improvements. A revised strategy should encourage a strategic approach to monitoring these, as advocated nationally by Natural England and the Environment Agency.²³

In the absence of a London-wide survey programme to assess changes in biodiversity, the Mayor should indicate in any update to the current Strategy how he intends to measure real progress on “net gain” in biodiversity and tree canopy cover. GiGL (Greenspace information for Greater London) could and should be strengthened and supported as the best mechanism for recording and monitoring the state of biodiversity in the capital.²⁴

Pollinator decline and use of pesticides

London is a green city with parks and gardens covering a large proportion of its area which help to provide flowering plants for pollinators all year round and are a vital resource when the countryside can't provide forage. Evidence indicates that pesticides are contributing to declines in pollinators, and have also been linked to many serious human health problems.

Although the vast majority of pesticides used in the UK are for agriculture, local authorities are the second biggest user group. Setting out aspirations for the use of pesticides will help to prevent inappropriate and damaging usage of them. To prevent biodiversity loss, action should be targeted at known infections rather than blanket spraying and general insecticides should not be used. The organisation Buglife emphasises that this is something that the London Biodiversity Strategy is able to address. London should learn from cities such as Paris, which has been pesticide free for ten years, Tokyo, which is pesticide free to support city bees, or Seattle where Parks and Recreation has been maintaining 14 parks without the use of any pesticides since 2001.²⁵

²⁰ Written submission from the London Wildlife Trust

²¹ Written submissions from the Environment Agency, Forestry Commission, London Borough of Camden, and London Borough of Southwark

²² Written submission from the London Wildlife Trust

²³ Written submissions from the London Borough of Southwark and Greenspace Information in Greater London (GiGL)

²⁴ Written submissions from the London Borough of Camden, Greenspace Information in Greater London (GiGL) and the Woodland Trust

²⁵ Written submission from Buglife

Increasing development pressures and the planning system

The last ten years have seen mounting pressure on local authorities within London with regards to new development, notably for housing and mixed use sites. This has come alongside declining resources for managing and maintaining green spaces and infrastructure. Reports indicate an increasing pressure for housing on green spaces and green belt sites. This is despite the fact there are over 110,000 'stalled sites' with planning permission which are essentially being 'banked' by developers and land investors as well as over 450,000 previously developed land sites (brownfield) available for development.²⁶

However, given the dramatic loss of wildlife rich brownfield sites the Biodiversity Strategy needs to examine the value of a 'no further loss' target to ensure that key brownfield sites of high biodiversity are protected. A recent report by Buglife reviewed losses of wildlife rich brownfield sites in London. It found that only 30% of wildlife rich sites remained intact and that around 70% had been fully or partially destroyed²⁷. The organisation Froglife calls for a system for evaluating the biodiversity value of a site is needed as current systems are grossly inadequate and subsequently sites of high biodiversity value are being lost on a daily basis this is particularly relevant for brownfield sites that are often incorrectly considered of low biodiversity value.²⁸

The Strategy should highlight the mechanisms and levers (e.g. neighbourhood plans or biodiversity offsetting) through which local authorities, communities and NGOs can now effect biodiversity enhancements and provide further guidance.²⁹

Biodiverse green roofs are becoming increasingly mainstream and it is possible to retro-fit them to buildings. The current Strategy acknowledges the benefits of living roofs but is aspirational in its aims. Specifying a target or stipulating all flat roofs over a certain size should be green would encourage living roofs to be incorporated into development at the planning stage and provide a starting point for negotiations with developers.³⁰

Use of GLA land and assets

The Mayor is now one of the largest public sector landowners in London and the GLA group functional bodies have extensive property holdings. An addendum to the Biodiversity Strategy should show how the Mayor will play a direct role in, and detail how these assets will be used to set the benchmark for, biodiversity delivery in the capital.³¹

Use of 'Biodiversity Offsetting'

It should be expected that a future implementation of biodiversity offsetting schemes will have a different impact on London Boroughs than other areas of the country. It would benefit from a strategic overview in London rather than being solely locally driven, in order that key objectives for

²⁶ Written submissions from the Campaign to Protect Rural England (CPRE) London and the City of Westminster

²⁷ Written submission from Buglife.

²⁸ Written submission from Froglife

²⁹ Written submissions from the London Borough of Camden and the London Borough of Sutton

³⁰ Written submission from Buglife

³¹ Written submissions from the Woodland Trust, the London Borough of Wandsworth, London Borough of Camden and the London Borough of Southwark

the capital are addressed by any offsetting system put in place.³² An update of the Biodiversity Strategy should consider biodiversity offsetting in the context of the role Local Nature Sites and other ecosystem services play for London's residents and how this would feasibly be implemented on a borough level given the pressure on Boroughs to reduce Areas of Deficiency in access to nature (AODs).³³

Progress on the 'All London Green Grid'

The ALGG Supplementary Planning Guidance is key to the delivery of additional and improved spaces for biodiversity in the capital. The London Borough of Wandsworth suggests that an addendum to the Biodiversity Strategy should provide further endorsement of the expectation to deliver improvements for biodiversity (quality and quantity) as a core aim of green and blue infrastructure delivery.³⁴

CPRE London notes that there needs to be a clearer reference to the link between the Strategy and the All London Green Grid SPG and improved monitoring of the progress of implementing the green grid. Whilst some regions – such as the original green grid area in East London along the Lee valley and the Wandle valley – are trying to make progress, there is no central point to capture the progress that is being made across London, bringing these sites together. The Mayor should increase investment in delivering the All London Green Grid.³⁵

Role of 'Green Infrastructure' and 'Ecosystem Services'

In assessing the value of green infrastructure and biodiversity it is important to capture the direct and indirect financial benefits of these sites and reflect that in cost benefit analyses of development proposals that impact green spaces. However, there is a continued market failure to recognise the multiple benefits derived from green infrastructure (more than simply SuDS or climate adaptation). This has resulted in under investment in green infrastructure. The Mayor and boroughs need to maximise these wide benefits and an addendum to the Biodiversity Strategy could seek to demonstrate how the eco-system services provided by biodiversity in London are fundamental to our role as the healthiest big city in the world, (meeting the Mayor's Health and Sport priority) and how they will be safeguarded from further loss.³⁶

Benefit of a greater biodiversity focus

Some stakeholders state that an update to the Strategy should focus on strategic biodiversity issues on their own merit, not just as a small part of, for example, the All London Green Grid approach as the drive is for a broader 'green infrastructure' doesn't necessarily address biodiversity conservation issues. Measures to enhance street trees, enhance parks for leisure, improve the environmental performance of buildings through greenery, and enhancing the street scene with ornamental vegetation. But there are aspects of Green Infrastructure – depending on the focus of its

³² Written submission from the London Wildlife Trust

³³ Written submissions from the London Borough of Sutton and the London Borough of Enfield

³⁴ Written submission from the London Borough of Wandsworth

³⁵ Written submission from the Campaign to Protect Rural England (CPRE) London

³⁶ Written submissions from the Campaign to Protect Rural England (CPRE) London, the London Borough of Wandsworth, and the Forestry Commission

interpretation - which potentially fail to address a number of concerns regarding biodiversity conservation or are in danger of diluting it.³⁷

2. Policy implementation

The London Borough of Southwark states that it will be difficult to implement biodiversity policies and guidance successfully at all levels of governance without more resources being available than is currently the case. The resources are required to provide support, guidance, promotion and admin support for biodiversity. A more strategic approach to the use of existing funds would be a valuable first step.

Need for clear, practical strategic guidance

The majority of stakeholders agree that there is still a need for guidance from London Government to inform what happens at a Borough level together with a delivery mechanism to ensure work to protect and enhance biodiversity continues. The Biodiversity Strategy should provide public and private funding bodies with a clear strategy that allows development of targeted funding programmes that deliver cost effective ways to achieve better resilience of London's wildlife habitats.³⁸ Some practical ideas from the Mayor on this front would be useful particularly for those 'on the ground'.

According to the Woodland Trust, an update to the Strategy should identify how boroughs, NGOs and businesses can work together to use London's remaining biodiversity expertise and achieve practical implementation of the London Plan and London Tree and Woodland Framework targets and share their expertise. Also key would be an indication of how the Mayor can publicly support and endorse delivery of the Biodiversity Strategy.³⁹

In the last 11 years there have not only been considerable developments in policy but also more recent considerable cuts in resources and shifting priorities. The Heritage Lottery Fund suggests a review of existing resources across London for the management and enhancement of the city's biodiversity as many non-statutory services have been drastically reduced in London. This is likely to have a severe impact on local authority ecology advisers, park management teams, rangers and educators, all critical to helping people engage with nature. It would be helpful to have more clarity from the Mayor via an updated Strategy of where current priorities for investment and projects now lie so that future grant funding is wisely invested.⁴⁰

Strong leadership and partnerships

Many of those organisations that responded to our call for evidence noted that in order to implement biodiversity policies and guidance successfully, there needs to be strong political and managerial leadership and support. While the need for sustainable development is acknowledged, a shift in vision is needed in the sense that biodiversity needs to be perceived differently, more in overall sustainability terms and not just specific to various habitats and species, where this sustainability makes sense.⁴¹

³⁷ Written submissions from the London Wildlife Trust and the Woodland Trust

³⁸ Written submissions from the London Borough of Havering and the London Borough of Sutton

³⁹ Written submission from the Woodland Trust

⁴⁰ Written submission from the Heritage Lottery Fund

⁴¹ Written submission from the London Borough of Ealing

It is important that there is a mechanism to help translate biodiversity issues and objectives for the capital into language that demonstrates the relevance of the subject matter to wider policy areas, not just biodiversity and land management, at all levels of governance. Biodiversity per se does not and won't have resonance as an issue with many sectors, communities and organisations. A refreshed strategy may help address this issue and help in encouraging delivery at all levels of governance from the strategic level all the way down to residents and community associations as well as private individuals. This may include innovative approaches, particularly in relation to connecting with non-biodiversity focussed people and organisations.⁴²

To aide this approach, the Mayor should also consider the benefits of integrating biodiversity work streams and policies with his other strategies and objectives more effectively, in particular:

- The Health Inequalities Strategy - for example, to ensure health benefits provided by nature and contribute towards reducing childhood obesity
- The London Plan – for example, to ensure protection and provision of green amenity spaces with new developments and allow for access to nature
- Jobs and growth objectives and 2020 Vision - for example, to demonstrate how biodiversity contributes to the green economy and complements Local Enterprise Partnerships and Business Improvement Districts

3. Small private green spaces - Raising awareness

The Committee was also told that private gardens collectively make up one third of London's green spaces and contribute significantly to biodiversity and ecological functions. However, with increasing pressure from property development and the growing popularity of "decking" and paving over gardens it would be timely to increase people's awareness of the value of gardens for biodiversity to ensure they are protected.

The London Wildlife Trust consider vegetated gardens to be critical to the long-term conservation and enhancement of biodiversity in London and that their loss will have profound effects on wildlife, as well as the contributions gardens make to the city's ability to adapt to climate change, flood water management, and provide access to nature.⁴³ Increasing public awareness and running behaviour change projects to influence the actions of landowners and community groups would be a major step in the right direction.⁴⁴ The Heritage Lottery Fund highlights this as one of the most important issues for London's biodiversity.

It is therefore important to ensure the biodiversity that is held in London's mosaic of small private green spaces is being protected and enhanced and that Londoners are being made more aware of this issue. To achieve that the Mayor should undertake the following steps:

⁴² Written submissions from Natural England, London Borough of Wandsworth, the Forestry Commission

⁴³ Written submission from the London Wildlife Trust

⁴⁴ Written submission from the London Borough of Sutton

Promotion, publicity and projects

- Embark on a programme of publicity and promotion in local and social media and at events to raise awareness of how wildlife can be protected and encouraged in private green spaces.⁴⁵

Only education and awareness can help change private individual behaviour and generate a culture that recognises and values the contribution of London's greenspace to biodiversity and other benefits to help reverse the current fashion for low maintenance decking and paving and close-board fencing which all restrict movement of wildlife.⁴⁶ Such a programme should also seek an approach that could ignite the potential of localism across the capital for individuals to make small changes that in turn drive significant collective gains.⁴⁷

- Collect and publicise up to date evidence of why gardens are important, and how to make them better for biodiversity is important to maintain. This is essential in order to build interest and provide a positive case for behaviour changes and protection. On-going support of research and presentation of evidence will be essential in the future.⁴⁸
- Utilise and promote use of the well-known Ealing Agenda 21 research (<http://www.ealingfrontgardens.org.uk/page2.htm>) into the damaging effects, including economic as well as environmental, of paving over front gardens. In addition to the evidence the project suggest potential actions for both local authorities and garden owners.⁴⁹
- Learn from existing projects and initiatives, for example the London Borough of Sutton's 'Biodiversity Back Gardens' project (<https://www.sutton.gov.uk/index.aspx?articleid=15790>) that worked with local students. The project aimed to raise the awareness of the heritage value of traditional back gardens as undervalued green spaces and included training events and workshops to help people acquire skills to identify and record biodiversity and to encourage more people to garden in a wildlife friendly way.⁵⁰

The planning system

- Promote more proactively to London Boroughs the encouragement afforded by your London Plan policy, to allow boroughs (in their Local Development Frameworks) to include a presumption against back garden development, which offers a tangible endorsement of measures to safeguard back garden land for a variety of reasons including biodiversity.⁵¹

The size of extensions that no longer require planning permission has been doubled which is placing considerable pressure on private garden space which provides important wildlife habitats and green connectivity.⁵² These changes in gardens are largely outside the scope of the planning process and therefore difficult to regulate. Even for matters under planning,

⁴⁵ Written submissions from the Federation of City Farms and Community Gardens
London Borough of Havering, London Borough of Ealing and the London Tree Officers Association

⁴⁶ Written submission from the City of Westminster and the Forestry Commission

⁴⁷ Written submission from Natural England

⁴⁸ Written submission from Greenspace Information in Greater London (GiGL)

⁴⁹ Written submission from the Federation of City Farms and Community Gardens

⁵⁰ Written submission from the Heritage Lottery Fund

⁵¹ Written submissions from London Borough of Wandsworth, Natural England, the Woodland Trust and the London Borough of Ealing

⁵² Written submission from Campaign to Protect Rural England (CPRE) London

such as front garden paving and Tree Preservation Orders, there are fewer resources within local planning authorities to monitor and enforce decisions.⁵³

- Maintain your on-going support of GiGL's maintenance of an up-to-date evidence base for biodiversity in London.⁵⁴

Biodiversity Strategy

- Use an update or addendum to the Biodiversity strategy as a tool to provide a strategic context of the role that back gardens play in improving the future resilience of London's Wildlife Habitats.⁵⁵ It should make this a clear statement in order to keep gardens on the biodiversity agenda, even though they are difficult to influence.⁵⁶ It could also help address inconsistency across London Boroughs in the implementation and enforcement of policy in regards to biodiversity protection and enhancement.⁵⁷

Support and funding for organisations and volunteers

- Support, promote and invest in the many organisations that are already carrying out exemplary work in London green spaces to increase their biodiversity value. There are many organisations working in London raising awareness amongst London of biodiversity issues but all of this needs financial investment and sadly the investment made into this area of work is far too low. (frog) (LBC)
- Support and promote pan-London networks of sites and experts, such as LEEF, the London Wildlife Trust, the London Parks and Greenspaces Forum, the Federation of City Farms and Community Gardens London network, the London Parks and Gardens Trust, etc. but also London's schools garden centres and community garden volunteers.⁵⁸

⁵³ Written submission from London Wildlife Trust

⁵⁴ Written submissions from the Woodland Trust and the London Borough of Wandsworth

⁵⁵ Written submissions from the London Borough of Sutton and the London Borough of Ealing

⁵⁶ Written submission from Greenspace Information in Greater London (GiGL)

⁵⁷ Written submission from the London Borough of Ealing

⁵⁸ Written submissions from the Federation of City Farms and Community Gardens, Natural England, London Borough of Ealing and the London Borough of Camden

Appendix 2 - Selection of relevant legislation and guidance since 2002

National

- European Water Framework Directive (2003)
- Animal Welfare Act (2006)
- Natural Environment & Rural Communities Act (2006)
- Natural Environment and Rural Communities Act (Section 41): list of protected species revised and updated (2007)
- Flood and Water Management Act (2010)
- Conservation of Habitats and Species Regulations Act (2010)
- Making space for nature. A review of England's wildlife sites (2010)
- Biodiversity 2020 - A strategy for England's wildlife and ecosystem services (2011)
- Natural Choice: Securing the value of nature. Natural Environment White Paper (2011)
- Localism Act (2011)
- National Ecosystem Assessment (2011)
- National Planning Policy Framework (2012)
- Forestry Policy Statement (2013)
- Biodiversity Offsetting White Paper (2013)
- BS 42020:2013 Biodiversity. Code of practice for planning and development (2013)

London-wide

- London Tree & Woodland Framework (2005)
- Improving Londoners' Access to Nature (2008)
- London Plan (2011)
- Preparing Borough Tree and Woodland Strategies SPG (2013)

Summary findings of the London Assembly biodiversity survey



About this survey

The London Assembly's biodiversity survey was conducted in August and September 2013, to inform the Environment Committee's October meeting and any further work.

The survey was promoted through a range of channels including the GLA's website and Twitter. Direct invitations were sent to over 300 community groups and networks with an interest in London's environment and we received over 800 individual responses.

At its October meeting, the Committee discussed London's biodiversity and green infrastructure with a panel of invited experts, followed by a call for written evidence on key questions that had emerged from the meeting to all boroughs and a number of key organisations in the sector. For more information visit:

www.london.gov.uk/biodiversity

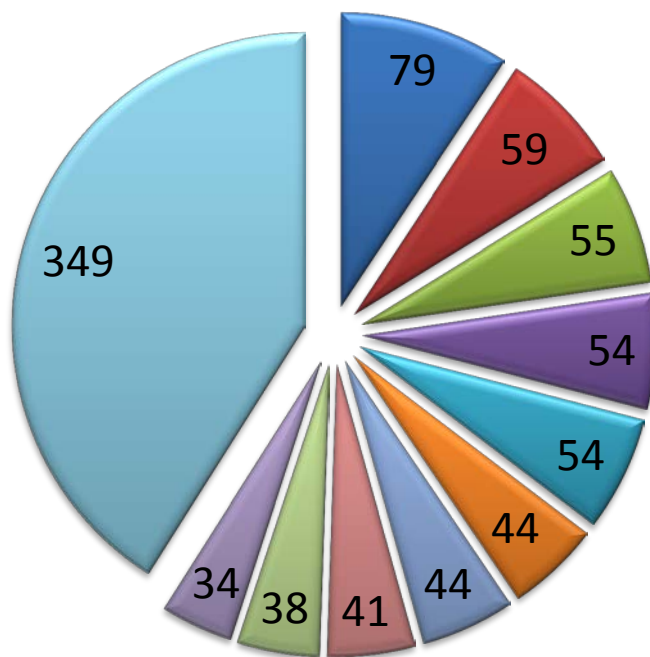


Images © London Wildlife Trust

Who responded?

We received 841 responses from across all London Boroughs from individuals and members of groups including 'Friends of Parks', local societies, residents associations, wildlife groups and conservation volunteers.

BOROUGH



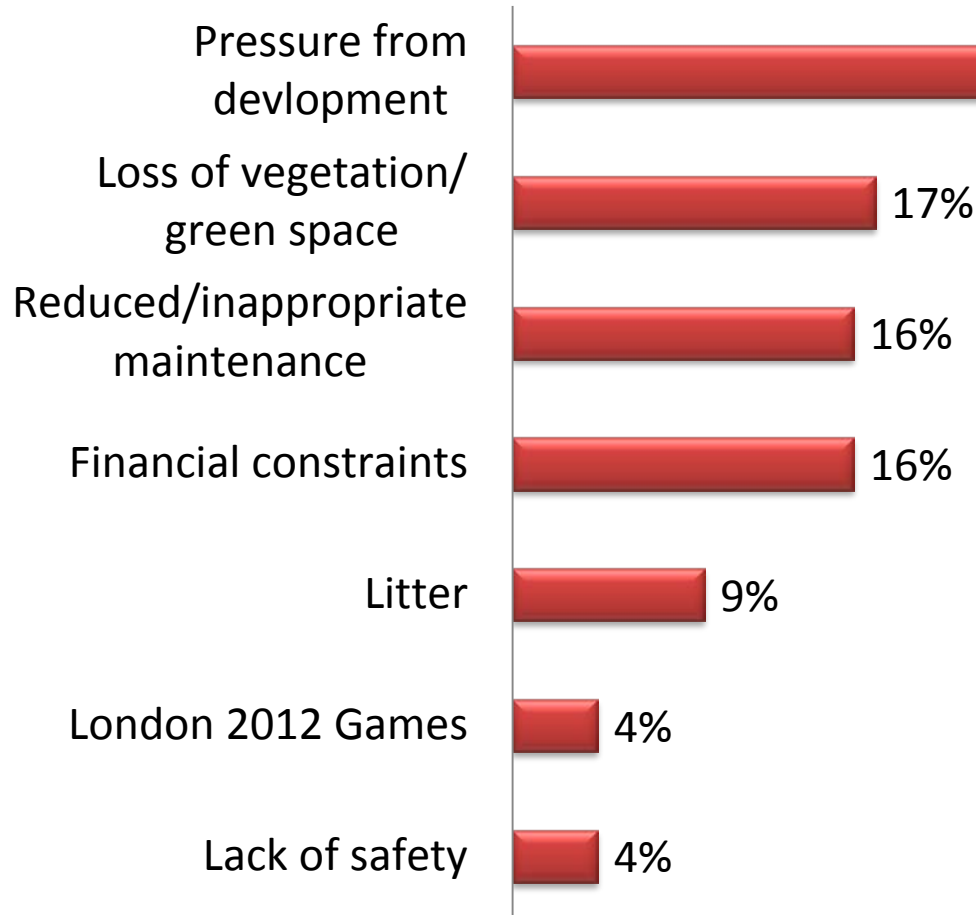
- Hackney
- Haringey
- Lewisham
- Richmond
- Southwark
- Barnet
- Camden
- Ealing
- Islington
- Enfield
- Other boroughs incl. City

Outer London	52%
Inner London	47%
Outside London	1%
All	100%

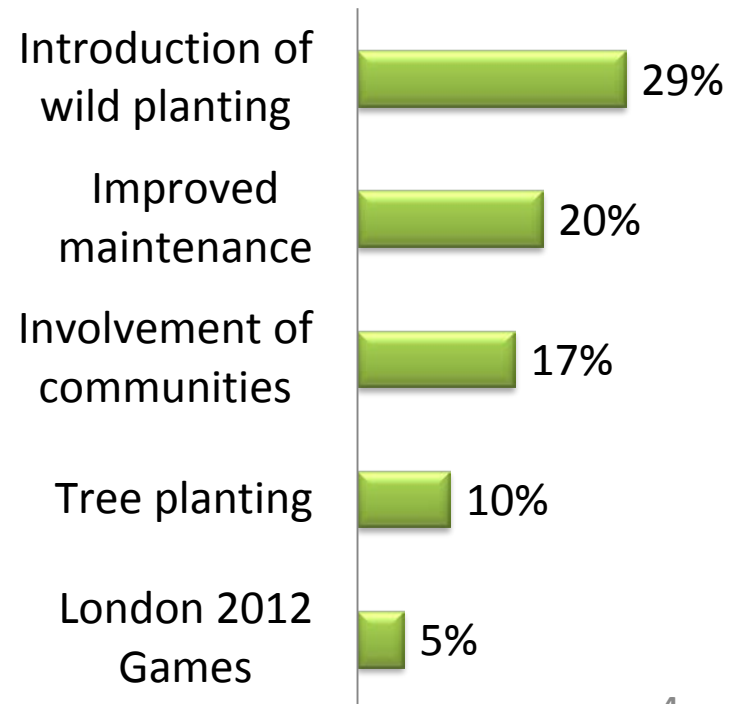
Key issues

The survey asked for examples of both positive and negative changes happening to green spaces in London. Some recurring themes and key issues have been identified.

Negative



POSITIVE

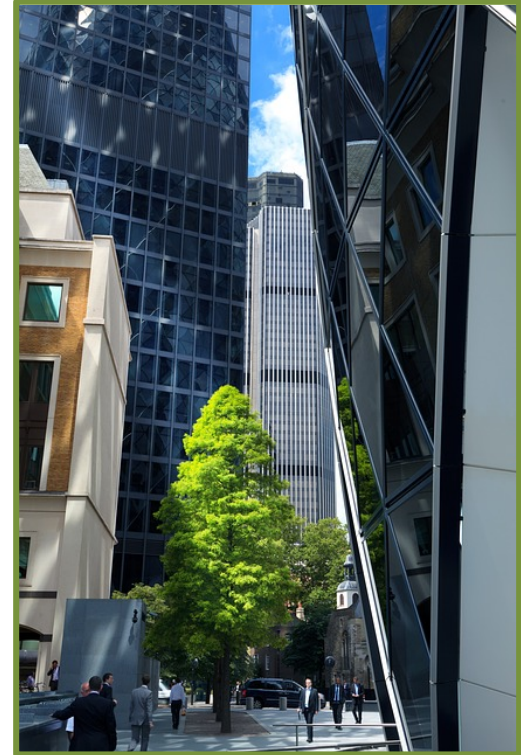


Views: Pressure from development

“Pressure from developers to build on green spaces or so called 'waste land' which is in fact a valuable wild habitat for all sorts of plants, insects and animals. The trend towards 'green desert' gardens with over-manicured lawns and borders is depriving wild birds and insects of food and habitat”.

“In Islington we are regularly losing green space as ever more housing is built. Housing is desperately needed but so is green space. Navigating this tension sensitively is critical. Housing should be very dense to minimise loss of green space”.

“More and more front and rear gardens are being paved over for cars, buildings or laziness of upkeep.”



“Pressure on local authorities to build new housing sometimes cuts off corners of parks or Metropolitan Open Land, eg Crystal Palace park.”

Views: Loss of vegetation or green space

“The trees along the rail route from East Croydon into Victoria have been mercilessly felled. Roadside verges containing wildflowers are cut unnecessarily. Let them grow! Presumably someone is paid to cut them? Save money and flowers”.

“Too many gardens belonging to houses and flats are being decked or paved - especially front gardens because of problems with parking. Loss of such gardens means greater risk of flooding and loss of biodiversity”.

“The protection of veteran trees needs to be revisited and local authorities encouraged to save such trees from destruction in view of the many thousands of pounds being spent by the Mayor in planting new trees”.



“Loss of tree, tree planting sites, shrub beds and grass verges for highway works is too common - especially for cycle schemes where increased paved areas are created at the cost of the green environment. Lots of small incremental loss of incidental open space makes a huge impact in total which does not seem to be recorded anywhere”.

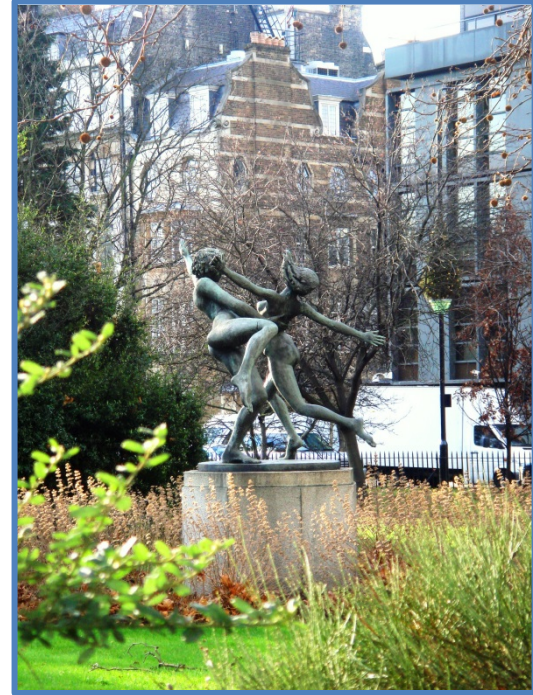
Views: Maintenance and wild planting

“Park keepers or organisations that look after parks have greater knowledge of their parks and give some thought to the management of spaces for the benefit of wildlife. For example, leaving areas of park as wildflower meadows before cutting in the Autumn.”

“Management of urban parks to encourage biodiversity, eg leaving grass uncut, is now accepted by the public as they have become more aware of the importance of biodiversity.”

“More people understand that these areas are deliberate and important, not ‘badly maintained’.”

“Lack of resources for carrying out the management plan on the Parkland Walk local nature reserve in Haringey has meant that many of the management plan actions haven't been undertaken and the habitat has deteriorated in quality as a wildlife site.”



“Some of the 'wild' zones can end up looking very unkempt. It still needs some regular maintenance and litter picking, even if it's 'wild'.”

Views: Community involvement

“I am a volunteer with TCV Croydon, so am actively involved in protecting and conserving green spaces in Croydon. My impression is that (...) a lot of good conservation work takes place in the borough.”

“Empty brown field sites not open to local community to grow wild flowers and/or food. It is sad to see plots of land fenced off and not being used rather than allowing local community groups to use them for constructive purposes whilst they wait for building to start.”

“There is a noticeable trend for community activities and for communities to pull together and improve their local area. (...) However, volunteers can't keep on top of all the maintenance and improvements necessary to maintain large green spaces like Finsbury Park.”



“Friends Groups have been working hard to restore neglected parks and green spaces to their former glory. With council backing, and funding for events like Parkfest, local residents are becoming more involved with these previously run-down areas, and are starting to appreciate the green spaces on their doorsteps and visit more often.”

Views: Financial constraints

“Too much use of [parks] for ticketed public events, eg concerts and fairs, thus reducing the quiet that parks provide for everybody.”

“There is growing commercialisation of London's Royal parks, eg concerts and cycling events which can disturb wildlife. This is a particular concern in Richmond Park which is an SSSI.”



“Enfield Council finally have an enthusiastic Biodiversity Officer which is a positive move in the right direction. However, lack of funding often hinders advancement of projects and means the officer is only part-time - with so much green space in our borough it means that progress moves slowly.”

“Apart from the larger green spaces, small squares such as Camden Square suffer from underinvestment, though I hasten to point out that this is not through lack of concern by the borough and its parks staff - who are excellent - but simply lack of resources.

“Once planting is done, there is not enough money to maintain the newly improved open space and so it goes into decline.”

Views: The 2012 Olympic Games

“Lack of restoration of Leyton Marshes, Wanstead Flats and Greenwich Park after the Olympics.”

“Despite all promises to the contrary by the Olympic Authority and LVRPA the marshes have been damaged, local wildlife and residents have been ignored and the pressure continues to 'develop' the wild parts of the valley for homes and 'recreation'. The Lea Valley is a unique and essential lung for London.”

“The Olympic park area is a fantastic place to visit for recreation and to experience many different types of habitats.”

“I very much liked the wild flower planting at the Olympic Park in 2012 - I hope that it is kept up.”

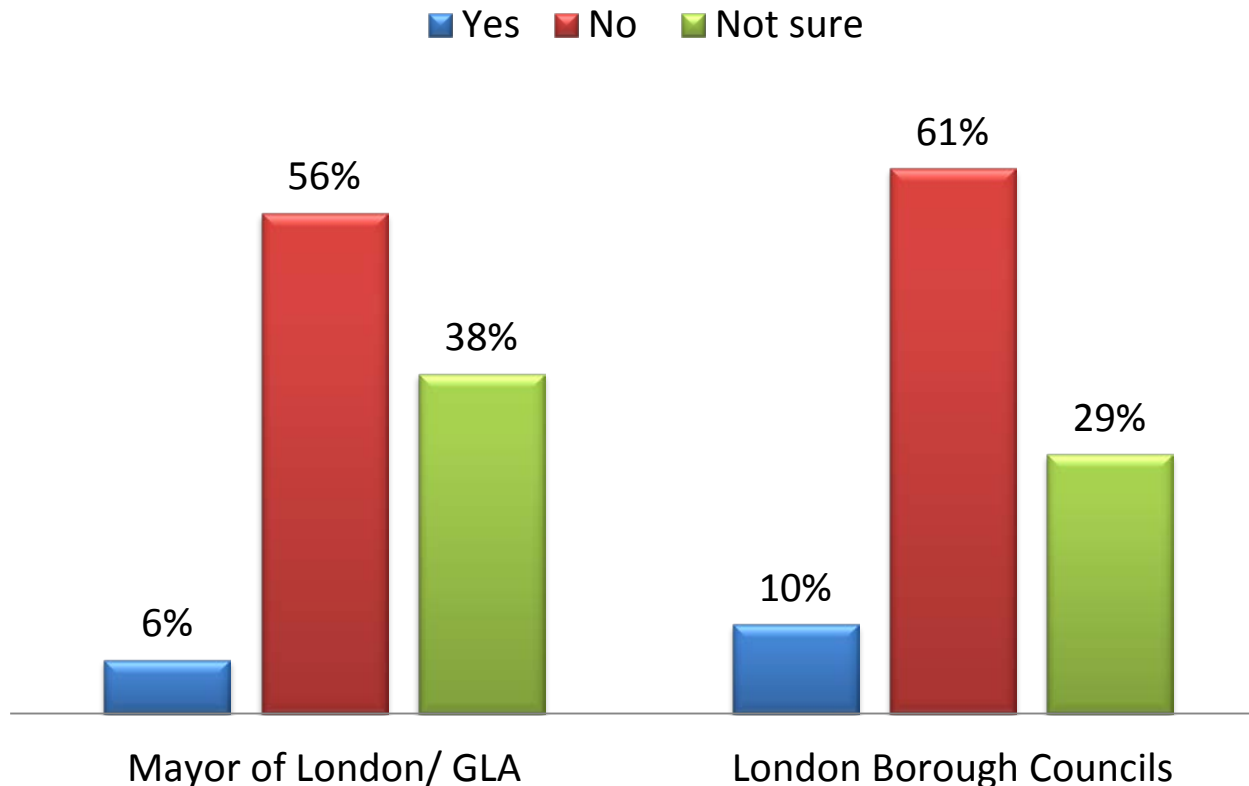
“There has been an increase in green spaces in the East of London (...) as part of the Olympic legacy.”



The role of the Mayor and local authorities

Survey respondents expressed their dissatisfaction over how local government and the Mayor fulfil their role and responsibilities regarding biodiversity.

DO YOU THINK THE MAYOR, GLA AND LONDON'S BOROUGH COUNCILS ARE DOING ENOUGH TO SUPPORT AND PROTECT BIODIVERSITY AND GREEN SPACES?



Views: The role of the Mayor and local authorities

“I think there needs to be a cross-London plan for conserving London's green spaces, in light of ever-increasing usage. But the problem is even if the political will is there, there probably won't be any money.”

“The Mayor should run an ad campaign asking people to leave their front gardens green, to help London's environment.”

“Stop building on open and green spaces. Require more tree planting and green areas in new developments. Stop people covering their gardens in concrete.”

“Have biodiversity plans for each borough and make sure London has a strong plan for encouraging biodiversity and pollinators that is acted upon.”



“Monitor the removal of trees more closely - ensure that the great value and importance of trees is not overlooked.”

“Ensure that making policies and plans is not the end of the matter - the resources need to be in place to monitor and implement them.”

“Maintain and expand projects such as ‘Rivers and People’ that provided a link between conservation officers and the general public.”