

MDA No.: 1729

Title: London's Plan for Nature - Consultation Response

1. Executive Summary

1.1 At the Environment Committee meeting on 12 June 2025 the Committee resolved that:

Authority be delegated to the Chair, in consultation with the party Group Lead Members, to agree any output from the discussion.

1.2 Following consultation with party Group Lead Members, the Chair agreed the Committee's response to the London Plan consultation, as attached at **Appendix 1**.

2. Decision

2.1 **That the Environment Committee's letter in response to the London Plan Consultation, as attached at Appendix 1, be agreed.**

Assembly Member

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

The above request has my approval.

Signature:



Printed Name: Léonie Cooper AM, Chair of the Environment Committee

Date: 20 June 2025

3. Decision by an Assembly Member under Delegated Authority

Background and proposed next steps:

- 3.1 The terms of reference for this investigation were agreed by the Chair, following consultation with party Group Lead Members, on 22 May 2025, under the standing authority granted to Chairs of Committees and Sub-Committees. Officers confirm that the letter and its recommendations fall within these terms of reference.
- 3.2 The exercise of delegated authority agreeing the Committee's letter will be formally noted at the Environment Committee's next appropriate meeting.

Confirmation that appropriate delegated authority exists for this decision:

Signature (Committee Services): *Sal Fazal*

Printed Name: Saleha Fazal

Date: 18 June 2025

Financial Implications: NOT REQUIRED

Note: Finance comments and signature are required only where there are financial implications arising or the potential for financial implications.


Signature (Finance): Not Required

Printed Name:

Date:

Legal Implications:

The Chair of Environment Committee has the power to make the decision set out in this report.

Signature (Legal): 

Printed Name: Rebecca Arnold, Deputy Monitoring Officer

Date: 20 June 2025

Email: rebecca.arnold@london.gov.uk

Supporting Detail / List of Consultees:

- Zack Polanski AM;
- Thomas Turrell AM; and
- Gareth Roberts AM.

4. Public Access to Information

- 4.1 Information in this form (Part 1) is subject to the FoIA, or the EIR and will be made available on the GLA Website, usually within one working day of approval.
- 4.2 If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary.
- 4.3 **Note:** this form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 - Deferral:

Is the publication of Part 1 of this approval to be deferred? NO

If yes, until what date:

Part 2 – Sensitive Information:

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

Is there a part 2 form? NO

Lead Officer / Author

Signature: *Richard*

Printed Name: Richard Clarke

Job Title: Senior Policy Adviser

Date: 18 June 2025

Countersigned by Executive Director:

Signature: *Hewen*

Printed Name: Helen Ewen, Executive Director of Assembly Secretariat

Date: 20 June 2025

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Léonie Cooper AM
Chair of the Environment Committee

Sir Sadiq Khan
Mayor of London
Greater London Authority

(Sent by email)

20 June 2025

Dear Sadiq,

Re: Towards a New London Plan

The London Assembly Environment Committee welcomes the opportunity to engage at this early stage in the development of the new London Plan. This letter sets out our key reflections following the Environment Committee meeting held on 12 June 2025, and I am responding on behalf of the Committee to the options set out for consultation in the *Towards a New London Plan* document.¹

1. Green Belt release

The Committee does not hold a common position on the principle of Green Belt land release in London. However, all party groups recognise that recent changes to the National Planning Policy Framework (NPPF) require the GLA and London boroughs to assess Green Belt land in order to meet housing targets.²

Concerns were raised during our meeting about some of the figures linked to the consultation regarding the current accessibility of Green Belt land. Richard Barnes, Head of Planning and External Affairs at London Wildlife Trust, told the Committee that the statement made in the Mayor's press release that "*Only around 13 per cent [of Green Belt] is made up of parks and areas that the public can access*" does not appear to be consistent with other data held by the London Wildlife Trust showing that 30 per cent of Green Belt is accessible Sites of Importance for Nature Conservation

¹ Mayor of London, [Towards a new London Plan](#), May 2025

² Ministry of Housing, Communities, and Local Government, [National Planning Policy Framework](#), December 2024

(SINCs).³ Given the political and environmental sensitivity of the Green Belt, any public statements must be based on accurate evidence.

Recommendation 1: The Mayor should clarify the source of analysis that measures the proportion of land that is currently accessible in the Green Belt and ensure that any figures used are fully referenced.

There is support among the Committee for the principle set out in the consultation of a brownfield-first approach. However, as the Deputy Mayor for Planning, Regeneration and Fire himself acknowledged, this would not mean that developers must “*only use Green Belt when all brownfield has been exhausted*”.⁴ It will therefore be vital to ensure that the planning process is clear on the use of brownfield site allocations and when Green Belt might come into play, and to give strong protections to areas with current nature designations and to those that are important for nature recovery.

We agree with the principle that future development must also be closely tied to sustainable transport connectivity, including active travel routes and high-frequency public transport.

Recommendation 2: The Mayor should provide detailed guidance and tools so that robust assessments can be made to ensure that the principles of brownfield-first development and proximity to sustainable transport can be implemented.

2. Metropolitan Open Land and golf courses

The Committee supports enhanced protection for Metropolitan Open Land (MOL), recognising the important environmental, recreational, and flood management functions these spaces provide. We welcome the confirmation by the Deputy Mayor for Planning, Regeneration and Fire that there will be a process as part of the current Green Belt review that considers whether specific Green Belt areas should be re-classified as MOL. This process needs to be transparent and comprehensive to ensure that all suitable areas are given the necessary protections.

Concerns were raised during our meeting by one of our guests regarding the potential development of golf courses identified as having limited public access or biodiversity. Alice Roberts, Head of Campaigns at CPRE London, told the Committee that its analysis had shown that, “*Pretty much every golf course in London has either SINC or Site of Special Scientific Interest (SSSI) status... We would very much like that statement to be corrected in the London Plan consultation where it says golf courses do not have any biodiversity effectively.*”⁵ In addition to this focus on biodiversity, it is important that any site must be assessed for its contribution to wider environmental functions such as water management and urban cooling, as is being developed through the London Green Infrastructure Framework.

Recommendation 3: The Mayor should ensure that the full range of green infrastructure benefits of golf courses and other green spaces - such as water management and urban cooling - are considered in any spatial planning decisions, and such sites are given

³ Mayor of London [Mayor: We must build on the green belt to help fix London's housing crisis](#) 9 May 2025. This states “The green belt can often be low-quality land, poorly maintained and rarely enjoyed by Londoners. Only around 13 per cent is made up of parks and areas that the public can access.”; [Environment Committee Meeting Transcript 12 June 2025, Panel 1](#), p.12

⁴ London Assembly, [Environment Committee Meeting Transcript 12 June 2025, Panel 2](#), p.1

⁵ London Assembly, [Environment Committee Meeting Transcript 12 June 2025, Panel 1](#), p.13

protection. If open spaces have Site of Importance for Nature Conservation (SINC) or Site of Special Scientific Interest (SSSI) status, this must be fully respected.

3. Local Nature Recovery Strategy and ecological data

Nature recovery and conservation should form an integral part of spatial planning. The success of London's Local Nature Recovery Strategy (LNRS) and its ability to inform spatial decision-making is dependent on the quality and consistency of underlying data.

Concerns were expressed to the Committee that some boroughs lack sufficient capacity to undertake comprehensive ecological mapping or to formally designate new SINC. We heard from Simone Turner, Interim Ecology and Adaption Lead at Hammersmith and Fulham Council, and Member of London Boroughs Biodiversity Forum (LBBF), that not all boroughs have an in-house ecologist.⁶ This represents a risk to the delivery of both the LNRS and broader environmental objectives. She told us that this could lead to the ecological value of some sites not being fully recognised due to a lack of site-specific assessments when classifying land as brownfield or other classifications, including *"open mosaic habitat, which to a lot of developers looks like wasteland, but in reality is a priority habitat."*⁷ It is therefore vital that funding is available to ensure that comprehensive surveys can be carried out, and ensure new sites are given appropriate protection.

Recommendation 4: As part of the implementation of the London Local Nature Recovery Strategy, the Mayor should make funding available to support ecological surveys and site designations to protect new areas of environmental value and designation of Sites of Importance for Nature Conservation (SINC) and Sites of Special Scientific Interest (SSSIs).

4. Biodiversity Net Gain and Urban Greening Factor

The Committee supports the principle of the mitigation hierarchy and heard during our meeting that the combination of Biodiversity Net Gain (BNG) and the Urban Greening Factor (UGF) are functioning well in London. Both tools support the objective of embedding biodiversity and climate resilience into planning decisions. Experts agreed that BNG and UGF policies complemented each other well. Simone Turner from LBBF told us *"we do get sites that are exempt from BNG...UGF is then the only other policy that allows us to have a measurable gain of nature on these sites. That is really key."*⁸ Julia Baker, Head of Nature Services at Mott MacDonald, said that combining UGF and BNG means that together *"It is a really interesting policy mix, in terms of really looking comprehensively..."*⁹

We also heard that there is a need for stronger requirements on the location of off-site mitigation. As Julia Baker from Mott MacDonald told us, *"It is really about making sure that local plans really embrace BNG and make it very specific and very local."*¹⁰ We agree that it is important that biodiversity improvements take place within London, and as near as possible to the original location, while also maximising the contribution to wider nature recovery. Abby Crisostomo, Head of Green Infrastructure at the GLA, told us in the meeting that the GLA is interested in identifying *"where*

⁶ London Assembly, [Environment Committee Meeting Transcript 12 June 2025, Panel 1](#), p.16

⁷ London Assembly, [Environment Committee Meeting Transcript 12 June 2025, Panel 1](#), p.17; Open mosaic on previously developed land (OMPDL) is a priority habitat in the UK Biodiversity Action Plan and has high environmental value. For more information, see Wildlife and Countryside Link [Open mosaic habitats high value guidance: when is brownfield land of 'high environmental value'](#)

⁸ London Assembly, [Environment Committee Meeting Transcript 12 June 2025, Panel 1](#), p.21

⁹ London Assembly, [Environment Committee Meeting Transcript 12 June 2025, Panel 1](#), p.20

¹⁰ London Assembly, [Environment Committee Meeting Transcript 12 June 2025, Panel 1](#), p.18

those offset credits should go.”¹¹ It is vital that the GLA gets this right, and we welcome further work to understand this better.

Recommendation 5: The Mayor should set requirements in the London Plan to ensure any offsite gains from Biodiversity Net Gain lead to improvements within London, and ideally in areas with strong connections to the original site.

Concerns were raised with the Committee about the Government consultation on proposed changes to the Planning and Infrastructure Bill that would remove BNG requirements from small sites. Simone Turner from LBBF told us that as BNG is only just over a year old, there isn't a lot of evidence on this, but that applicants who engage with BNG requirements from the start of the process are able to achieve it more easily. Overall, she said small sites *“definitely can achieve the ten per cent”* biodiversity improvement required.¹² In the view of the Committee, this indicates that clearer guidance and support is needed from the outset rather than to scrap the requirement.

The Committee also heard concerns around the changes proposed in the Planning and Infrastructure Bill which could potentially weaken protections and mitigations, by replacing existing protections with an Environmental Delivery Plan. Richard Barnes from London Wildlife Trust, described it as a *“retrograde step”*, and Elliot Newton, Director of Rewilding at Citizen Zoo, told us that other licensing systems work better than the approach proposed.¹³

Recommendation 6: The Mayor should continue to lobby the Government around proposed changes to Biodiversity Net Gain for small sites and the Environmental Delivery Plans to ensure these do not lead to a reduction in environmental protection and overall biodiversity within London.

5. Private gardens and residential green space

Private gardens contribute significantly to urban biodiversity and sustainable water management. The LNRS is expected to recognise this and provide direction on protecting and enhancing green space on private land. The Committee would like to see increased focus in this area in the London Plan, as it is a significant opportunity area which is often ignored.

6. Green corridors and cross-borough collaboration

Green corridors and ecological networks do not conform to borough boundaries. The Committee agrees that the LNRS for London must actively inform cross-borough planning and collaboration. These networks are vital to sustaining biodiversity, promoting climate resilience, and enabling species movement. Alongside this, TfL and National Rail overground sites provide an opportunity to use this land to link different habitats and create green corridors.¹⁴

Recommendation 7: The London Plan should have a focus on extending green infrastructure across a range of scales, including small sites, gardens and linear connections, such as green corridors alongside roads and railways.

The Committee would welcome a response to this letter by 1 August 2025. Please send your response by email to the Committee's Clerk, Saleha Fazal (Saleha.Fazal@london.gov.uk).

¹¹ London Assembly, [Environment Committee Meeting Transcript 12 June 2025, Panel 2](#), p.15

¹² London Assembly, [Environment Committee Meeting Transcript 12 June 2025, Panel 1](#), p.21

¹³ London Assembly, [Environment Committee Meeting Transcript 12 June 2025, Panel 1](#), p.24

¹⁴ London Assembly, [Environment Committee Meeting Transcript 12 June 2025, Panel 1](#), p.5-6

Yours,

A handwritten signature in dark ink, appearing to read 'Léonie Cooper', written in a cursive style.

Léonie Cooper AM
Chair of the Environment Committee