



## **New London Plan - consultation input from Butterfly Conservation**

These comments are made on behalf of Butterfly Conservation, the UK charity dedicated to saving butterflies and moths and the environment that supports them ([www.butterfly-conservation.org.uk](http://www.butterfly-conservation.org.uk)). Our aims are to help recover threatened butterflies and moths, increase numbers of widespread species, and inspire people to understand and deliver species conservation.

Butterfly Conservation is seeking to increase its activities and presence in London. We are keen to promote appropriate habitat management and to increase our knowledge of the distribution and abundance of species in the capital. Mindful of the well-being benefits of people connecting with nature, we are also exploring ways of increasing our levels of engagement with local communities in London.

We have limited our comments to areas of the Plan related to biodiversity, green spaces, connection with nature and the benefits this brings to Londoners. Most detail is provided on Chapter 8 - Green Infrastructure and Natural Environment.

### **Chapter 8 - Green infrastructure and natural environment**

#### **General comments on Chapter 8**

- Given the pressures from development, green spaces need greater levels of protection, preferably statutory.
- Overall, there needs to be more clarity on implementation. The Mayor can be more directive in his language, e.g. using 'must' instead of 'should'.
- We believe that there should be more emphasis on biodiversity as a key component of green infrastructure, and as an unquantifiable element of natural capital.

### **Policy G1 - Green infrastructure**

- A. London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.
- B. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.
- C. Development Plans and Opportunity Area Planning Frameworks should:
  1. identify key green infrastructure assets, their function and their potential function
  2. identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

### **Comments - G1**

- The green infrastructure approach and the associated concept of ecosystem services are generally welcomed. We think it is important, however, that the inherent value of biodiversity is recognised, over-and-above the economic gains from ecosystem services. (See, for example, British Wildlife, Vol 29, p166ff.)
- The requirement for Boroughs to produce Green Infrastructure Strategies is welcomed. However, it is not clear how these relate to boroughs' Biodiversity Action Plans, and whether the latter will be continued. It is also not clear how these relate to Habitat Action Plans maintained by GiGL. We believe that it is important to retain BAPs and HAPs and that these are updated.
- No timing is set for the production of Green Infrastructure Strategies, nor does there appear to be any requirement for refresh.
- Under G1 C, the wording should be strengthened, giving a stronger steer to Boroughs to identify the importance of green infrastructure assets and opportunities for intervention.

### **Policy G2 - London's Green Belt**

- A. The Green Belt should be protected from inappropriate development:
  1. development proposals that would harm the Green Belt should be refused
  2. the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported.
- B. The extension of the Green Belt will be supported, where appropriate. Its de-designation will not.

### **Comments - G2**

- The absolute protection of green belt land is strongly supported (improvement over FALP).

### **Policy G3 - Metropolitan Open Land**

- A. Metropolitan Open Land (MOL) should be protected from inappropriate development:
  - 1. development proposals that would harm MOL should be refused
  - 2. Boroughs should work with partners to enhance the quality and range of uses of MOL.
- B. The extension of MOL designations should be supported where appropriate.
- C. Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.
- D. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:
  - 1. it contributes to the physical structure of London by being clearly distinguishable from the built-up area
  - 2. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
  - 3. it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
  - 4. it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

### **Comments - G3**

- We note that protection for MOL has been weakened, with the introduction of the principle of land swaps in para 8.3.2 (though it is not clear exactly what this means).
- Given the pressures on land use in London, we urge that MOL be protected, retained, and that public access is ensured.

#### Policy G4 - Local green and open space

- A. Local green and open spaces should be protected.
- B. The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.
- C. Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required [\[105\]](#).
- D. The loss of green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.
- E. Development Plans and Opportunity Area Frameworks should:
  - 1. include appropriate designations and policies for the protection of green and open space to address deficiencies
  - 2. ensure that future green and open space needs are planned for in areas with the potential for substantial change
  - 3. ensure that green and open space needs are planned in line with objectives in green infrastructure strategies in order to deliver multiple benefits and in recognition of the cross-borough nature of some forms of green infrastructure.

[\[105\] http://www.gigl.org.uk/open-spaces/areas-of-deficiency-in-access-to-public-open-space](http://www.gigl.org.uk/open-spaces/areas-of-deficiency-in-access-to-public-open-space)

#### Comments G4

- G4 D opens the door to off-setting. This is not supported, as it encourages degradation of original biodiversity. The 'equivalent' is very rarely like-for-like.
- There are in excess of 3,000,000 private gardens within Greater London, amounting to 24% of London's area. 14% of this is estimated to be vegetated green garden space (GiGL CIC, 2015). Gardens are a significant resource for wildlife and people and play a particularly important role in creating networks of green spaces.
- The important contribution of private gardens needs acknowledging and we would welcome any policy that seeks to control excessive 'garden grabbing'.

### **Policy G5 - Urban greening**

- A. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- B. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominantly commercial development.

### **Comments G5**

- The concept of an Urban Greening Factor is generally welcomed.
  - However, it is inevitable that developers will manage down to the minimum target scores set by the Mayor, seeking the lowest cost ways to do so. In the example provided in para 8.5.4 the proposed office development with green roof, open water and amenity grassland, has an UGF of 0.54, well above the target 0.30. The developer could omit all the amenity grassland and open water features and reduce the green roof from 600sqm to around 430sqm and still meet the target.
  - Therefore correct setting of targets will be of vital importance.
  - Allowing each borough to develop its own approach to the UGF risks confusion and a devaluation of the system as boroughs compete for private development incomes.
- The emphasis on green roofs is welcomed, providing these are designed with biodiversity in mind (not just rough grass). The same applies to green walls, though these tend to be more expensive to build and maintain, and are less environmentally friendly as a result.
  - It is important that the introduction of green roofs and walls are not used as ways to justify the loss of existing green spaces - or as reasons to avoid including green spaces in developments. Children cannot play on green roofs or walls – indeed the potential for any person to interact with and enjoy nature are greatly reduced. Green roofs and walls are also limited in the biodiversity that they can support.

#### **Policy G6 - Biodiversity and access to nature**

- A. Sites of Importance for Nature Conservation (SINCs) should be protected. The greatest protection should be given to the most significant sites.
- B. In developing Development Plan policies, boroughs should:
  - 1. use the relevant procedures to identify SINCs and green corridors. When undertaking comprehensive reviews of SINCs across a borough or when identifying or amending Sites of Metropolitan Importance boroughs should consult the London Wildlife Sites Board
  - 2. identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
  - 3. seek opportunities to create habitats that are of particular relevance and benefit in an urban context
  - 4. include policies and proposals for the protection and conservation of priority species and habitats and opportunities for increasing species populations
  - 5. ensure sites of European or national nature conservation importance are clearly identified and appropriately assessed.
- C. Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following approach should be applied to minimise development impacts:
  - 1. avoid adverse impact to the special biodiversity interest of the site
  - 2. minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site
  - 3. seek appropriate off-site compensation only in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.
- D. Biodiversity enhancement should be considered from the start of the development process.
- E. Proposals which create new or improved habitats that result in positive gains for biodiversity should be considered positively, as should measures to reduce deficiencies in access to wildlife sites.

## Comments G6

- We believe that it is important that this Policy is properly enforced.
- We support the policy G6 A about protection of SINCS.
- We especially support the specific mention of green corridors, as these can be disproportionately valuable for biodiversity and for the well-being of residents and visitors.
- Ref. G6 B.3 and 4, Butterfly Conservation is keen to see butterflies and moths considered as priority groups for protection and relevant habitat maintenance/improvement. We have some data and experience that can inform interventions and decisions.
- Off-site compensation is not supported, as it does not adequately compensate for the loss of on-site green space and associated biodiversity.

### Policy G7 - Trees and woodlands

- A. Trees and woodlands should be protected, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
- B. In their Development Plans, boroughs should:
1. protect 'veteran' trees and ancient woodland where these are not already part of a protected site
  2. identify opportunities for tree planting in strategic locations.
- C. Development proposals should ensure that, wherever possible, existing trees of quality are retained<sup>[108]</sup>. If it is imperative that trees have to be removed, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

<sup>[108]</sup> Category A and B trees as defined by BS 5837:2012

## Comments - G7

- The policy to protect - and expand - London's urban forest is supported.
- Tree selection - whether for protection or planting - should be based on broader considerations than BS 5837:2012.
- The focus should be on native species and on a range of trees that support biodiversity. For example, London Planes are resilient and have important heritage value, but produce neither pollen nor nectar and are very poor for biodiversity.
- Butterfly Conservation can advise on the biodiversity benefits of different trees.
- The importance of mature hedgerows in providing habitat and connectivity between green spaces should also be acknowledged in this policy.

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### **Policy G8 - Food growing**

A. In Development Plans, boroughs should:

1. protect existing allotments and encourage provision of space for community gardening, including for food growing, within new developments
2. identify potential sites that could be used for commercial food production.

#### Comments G8

- We urge that consideration is given to the role of insects - honey bees, wild bees, butterflies, moths, etc. - as pollinators. Biodiversity will be important to the success of food production, especially in areas of deficiency of access to nature.

### **Policy G9 - Geodiversity**

A. In Development Plans, boroughs should:

1. establish clear goals for the management of identified sites to promote public access, appreciation and interpretation of geodiversity
2. ensure geological sites of European, national or regional conservation importance are clearly identified.

B. Where relevant, development proposals should

1. make a positive contribution to the protection and enhancement of geodiversity
2. protect Regionally Important Geological Sites (RIGS)
3. give Locally Important Geological Sites (LIGS) the level of protection commensurate with their importance.

No comments on G9

#### **Broader aspects of the Plan**

The integrated nature of the plan and the policies that it proposes is strongly supported.

- For example, the protection of open spaces, the green belt, MOL, SINC is an important part of Good Growth, Policy GG2 D - protecting open spaces. Similarly, the requirement for improved access to green spaces and for new green infrastructure is cited in Policy GG3 - Creating a healthy city.
- We support the proposal that green infrastructure should be incorporated into the public realm, see Policy D7 - Public realm.
- We also support initiatives to better connect people with nature, as in Policy S5 - Sports and recreation facilities, e.g. the Walk London Network.
- Finally, we note that green infrastructure contributes benefits to air quality (Policy SI1) and to sustainable drainage and flood mitigation (Policies SI12, SI13).

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We have listed our key contacts below and should you require any clarification or expansion of any of the points covered above please do not hesitate to get in touch.

Yours Faithfully,



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