



Sadiq Khan
London Plan Team
City Hall
The Queen's Walk
London
SE1 2AA

2nd March 2018

Dear Mr Khan,

DRAFT NEW LONDON PLAN
Greenspace Information for Greater London CIC's (GiGL) response

GiGL is a not-for-profit social enterprise, and represents Greater London in a UK-wide network of local environmental records centres (LERC), defined as '*not-for-profit organisations that collect, collate and manage information on the natural environment for a defined geographic area. LERCs support and collaborate with a network of experts to ensure information is robust, and make information products and services accessible to a range of audiences including decision-makers, the public, and researchers*' (Association of Local Environmental Records Centres).

GiGL mobilises and curates data on behalf of many of the experts in Greater London that generate them professionally or as volunteers, and access to them is provided via a range of services designed to enable our stakeholders to make effective decisions, comply with their statutory obligations and policy requirements, and give appropriate consideration to the natural environment during their activities. The core datasets relevant to this consultation include:

- Geodiversity – managed on behalf of London Geodiversity Partnership
- Habitats – London-wide coverage, including priority habitats and a habitat suitability model covering every open space in London developed in collaboration with London Biodiversity Partnership's habitat experts
- Open space – London-wide coverage, including information on ownership, facilities, designations
- Public Open Space and associated areas of deficiency in access
- Sites Of Importance For Nature Conservation and associated areas of deficiency in access, managed on behalf of the London Wildlife Sites Board
- Species – over 4 million records including protected and invasive non-native species

In our capacity as an LERC accredited by the Association of Local Environmental Records Centres, we must remain impartial. Our consultation response on the Draft New London Plan (NLP) relates to the national policy and best practice that we draw on to engage a broad range of partners and clients, as well as relevant experience from working with them in Greater London and further afield.

Policy GG2 Making the best use of land

To create high-density, mixed-use places that make the best use of land, those involved in planning and development must:

- *A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites*

GiGL response: National Planning Policy Framework Core Principles include the following text: *encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.* To understand the existing environmental value of previously developed land, developers and planners will require access to a rigorous evidence base and to ecological expertise to interpret this and any implications arising from development to ensure compliance.

- *D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening.*

GiGL response: we welcome this. There is also an opportunity to strengthen London's commitment to making the best use of land here by requiring net gain for biodiversity as per National Planning Policy Framework, the government's recently published 'A Green Future: Our 25 Year Plan to Improve the Environment', and policy 7 of the draft Mayor's Transport Strategy 2017.

Policy GG2 Making the best use of land – supporting text

1.2.6 - As London develops, the Mayor's Good Growth by Design programme - which seeks to promote and deliver a better, more inclusive form of growth on behalf of all Londoners - will ensure that homes and other developments are of high quality. Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering 50 per cent green cover across London, will be important to help London become a National Park City.

GiGL response: we generated the '47% green space' statistic that National Park City and others have been using as a headline. In order to monitor progress towards reaching the 50 percent green target there needs to be a clear requirement for managing and improving the evidence base, including commitments for the London Boroughs to ensure data are kept up to date for their areas, and the results of biodiversity net gain shared with GiGL. We are currently developing a system to enable this in collaboration with Transport for London, and are keen to discuss how the use of this system may be expanded out to others in the GLA Family and to London Boroughs.

Policy GG3 Creating a Healthy City

GiGL response: we welcome this. There is an opportunity to include relevant ecosystem services here, as well as a commitment to reducing the areas of deficiency in access to nature and public open space.

Chapter 02 Spatial Development Patterns

2.0.2 London's green and open spaces are a vital part of the capital. Its parks, rivers and green open spaces are some of the places that people most cherish and they bring the benefits of the natural environment within reach of Londoners. London's Green Belt and

Metropolitan Open Land designations (see [Chapter 8](#)) serve to protect these strategically-important open spaces, prevent urban sprawl and focus investment and development on previously developed land.

GiGL response: the ecosystem services delivered by a healthy natural environment are of benefit to Londoners even without their active engagement with it. The ‘within reach’ wording is unnecessary.

Policy D1 London's form and characteristics – supporting text

3.1.4 – Maximising urban greening and creating green open spaces provides attractive places for Londoners to relax and play, and helps make the city more resilient to the effects of climate change. Landscaping and urban greening should be designed to ecologically enhance and, where possible, physically connect, existing parks and open spaces.

GiGL response: Policy D1’s requirements for local context and character are relevant to the natural environment too and could be included here.

3.2.2 Understanding the existing character and context of individual areas is essential in determining how different places may develop in the future. An evaluation of the current characteristics of a place, how its past social, cultural, physical and environmental influences have shaped it and what the potential opportunities are for it to change will help inform an understanding of an area’s capacity for growth.

3.2.3 This evidence gathering and evaluation of alternative options, alongside an understanding of the requirements for growth, should form the foundation of Local Plan preparation or work on an area strategy. This process will be fundamental to inform decision making on how places should develop, speeding up the development plan process and bringing about better quality development

GiGL response: The principles in 3.2.2 and 3.2.3 are relevant to the consideration of the natural environment in strategic and development control planning too. Access to a rigorous evidence base is vital to avoid net loss, ensure appropriate management of invasive non-native species on site and to prevent their further spread, and to inform net gain objectives.

Policy H2 Small sites – supporting text

4.2.9 Loss of existing biodiversity or green space, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates.

GiGL response: ‘biodiversity’ needs clarification here. It is not the same as green cover, and developers must have regard for protected wildlife and sites in the development process as per NPPF. Reference to the Business and Biodiversity Offsets Programme (BBOP) mitigation hierarchy would be useful here too so that the distinction can be clearly made between biodiversity value and green cover.

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:

Identify key green infrastructure assets, their function and their potential function

Identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

GiGL response: it is essential for us to continue to record all of the features in point A centrally so that the information is accessible to anyone that needs it, including enabling us to support the GLA's reporting on progress towards the 50% green target. With this in mind it would be useful to add the word 'recorded' (or similar) in to 'A'.

Policy G2 London's Green Belt and Policy G3 Metropolitan Open Land

GiGL response: high quality data identifying where green belt and metropolitan open land is should also be generated and centralised to enable informed decision-making.

Policy G4 Local green and open space

GiGL response: there is also a need for the creation of green and open spaces that are inaccessible to the public because biodiversity and public access aren't always compatible. Good examples of this include the habitat creation and restoration work along London's railway linesides.

Policy G4 Local green and open space – supporting text

8.4.3 The creation of new green or open space is essential in helping to meet the Mayor's long-term target of making more than 50 per cent of London green by 2050. New provision or improved access should be particularly encouraged in areas of deficiency in access to public open space. It will also be important to secure appropriate management and maintenance of open spaces to ensure that a wide range of benefits can be secured and that any conflicts between uses are minimised.

GiGL response: there needs to be a much clearer requirement for a rigorous centralised evidence base that manages data from the public, private and voluntary sectors including local authorities and developers, so that changes can be monitored and reported on.

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.

GiGL response: there are many more 'minor' development proposals than 'major' in London that collectively cover a far greater area, and these have a role to play here too. As per Policy D1, anyone designing urban greening should understand the site in context with its surrounds to ensure it is locally appropriate. Additionally the term "green" should be defined to ensure it means living features rather than visually aesthetic solutions that are artificial to ensure they are of benefit.

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.

GiGL response:

- Point B should have two additional clauses that cover:
 - Validation and registration by London Boroughs of specific application types being dependent on the applicant demonstrating their application has been informed by a high quality evidence base on the natural environment
 - A requirement on London Boroughs to have access to the same evidence base to inform their decisions on whether they grant permission.

Background to the above suggestion:

In 2011 we conducted a survey of London Boroughs to gain an understanding of how they were assessing applications' likely impact on the natural environment, and to garner support for a planning screening tool that we were developing in collaboration with Natural England.

27 of the 33 London Boroughs were partners in GiGL and already had access to our development control-related datasets and services, but our view was that the project provided an opportunity to help our partners make even better use of the data. It aimed to speed up their validation and decision-making processes by enabling them to batch screen applications against a set of rules based on national and regional policy and best practice.

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However, based on the feedback via the survey, and additional dialogue with our planning officer, it became clear that few if any planning authorities were routinely screening applications, and in seeking planners to help with trialling the tool we realised that uptake would be low. Effectively, the tool was *introducing* the step of screening of applications for their likely impact on the natural environment in many cases, which in the absence of any accountability / monitoring at a national or regional level was less of a priority than the speed at which applications were processed. One planner went as far as telling us they didn't have any biodiversity in their borough to consider, which we obviously have a wealth of data to counter.

With the number of local authorities in our partnership hovering between 24 and 27, we continued to monitor our data search service against planning application statistics on a per borough basis, to try to encourage the remaining 6 to 9 London Boroughs to become partners and improve uptake of our data search service which is specifically aimed at informing planning applications. By 2016, we were still only providing reports for approximately 1% of applications. We knew this meant that applications that were likely to result in net loss of biodiversity were being submitted without being informed by sufficient up-to-date information, and those same applications weren't being properly assessed by the London Boroughs during the validation and decision-making stages either.

The Greater London Authority's Urban Greening Team commissioned research ([Planning for Biodiversity](#) 2016) that assessed planning applications against biodiversity criteria based on the planning application form 1APP, with additional criteria that brought in London Plan policies. The research established that approximately 18% of planning applications met at least one of the criteria, and arguably should all have been informed by our data search reports. To put it in perspective, approximately 15,000 applications *weren't* informed by high-quality up to date information, and despite promotion and the setting of best practice at a national level, including the BSI Standards Publication 'Biodiversity – Code of practice for planning and development' (2013), the [figures](#) haven't changed much since.

The National Planning Policy Framework (NPPF) Chapter on Using a Proportionate Evidence Base, Paragraph 165 states: *Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans. Working with Local Nature Partnerships where appropriate, this should include an assessment of existing and potential components of ecological networks. A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.*

In addition, Section 40 of the Natural Environment and Rural Communities Act (NERC, 2006) also states that '*Every public body must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity*'

The current London Plan makes no reference to NPPF paragraph 165, and recent discussions with clients and partners have suggested that the absence of this requirement is the reason that so many applications and related decisions aren't routinely informed by the evidence base that we provide access to for this purpose, and that the current uptake is driven solely by stakeholders that are following their industries' best practice. We have no recent information on whether our Borough partners routinely use the planning-related datasets that we provide them, but we do know that 8 London Boroughs don't have access to our evidence-base, and the percentage of applications informed by a GiGL data search report in their areas range from approximately 0.6 to 1.1 percent.

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We strongly recommend that paragraph 165 of NPPF is tailored to the London region in Point B, including a requirement that particular application types are informed by a high quality evidence base on the natural environment. There were recommendations on this set out in the Planning for Biodiversity report covering major, minor and householder application types that aren't included in the public-facing version of the report online. The report's recommendations would result in local planning applications, decisions and net gain initiatives being informed by robust evidence, and would deliver some of the recommendations in the London Assembly's 'At Home With Nature' report from 2017.

- Point D should include a requirement for seeking net gain in biodiversity as per NPPF and the government's recently published 25 year plan
- London Invasive Species Initiative's website states: *Invasive non-native species (INNS) are one of the largest threats to global biodiversity after habitat loss and destruction. They cost the British economy an estimated £1.7 billion annually and Europe in excess of €12 billion annually.* Co-ordinated action is essential in Greater London, and is relevant to A, B, C and D above.
- E – proposals should be based on our habitat suitability mapping, which was created in collaboration with London's habitat action plan working group members.
<http://www.gigl.org.uk/habitat-data/bap-habitat-suitability-data/>

Policy G6 Biodiversity and access to nature – supporting text

8.6.3 Development proposals that are adjacent to or near SINC's or green corridors should consider the potential impact of indirect effects to the site, such as noise, shading or lighting. There may also be opportunities for new development to contribute to enhancing the nature conservation value of an adjacent SINC or green corridor by, for example, sympathetic landscaping that provides complementary habitat. The London Environment Strategy includes guidance on identifying SINC's as well as habitat creation targets and a comprehensive list of priority species and habitats that require particular consideration when planning decisions are made.

GiGL response: we welcome this with some suggested amendments

- The details set out in 8.6.3 also need to be considered at the pre-application stage, and this should be reflected in the policy as well as the supporting text
- Not all priority habitats and species are protected by the SINC network. The specifics of 8.6.3 regarding habitats and species should also be reflected in policy G6. In support of this, the statistics we provided to the project steering group of the Planning for Biodiversity research in 2016 were:

	Within SINC's	Outside SINC's
Water Habitats (hectares)	4224	104
Protected Species records (count)*	255935	173817
London Species of Conservation Concern records (count)*	215405	143749
Priority Habitats (hectares)	11315	1695

* These figures have increased since as our species data holdings are cumulative

- Additional illustration of London's natural environment or visualisations of the resource are required. We can provide these to illustrate the extent of London's green space, priority species and habitat hotspots, SINC's and associated areas of deficiency, habitat suitability maps etc.
- Many London Boroughs are reviewing and reissuing their biodiversity action plans as a means of measuring their activities in this area, and there is an appetite to do likewise for

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the regional biodiversity action plans in the biodiversity sector. It would be useful to reference this here.

Chapter 12 Monitoring

GiGL response: we suggest that a more comprehensive KPI for the environment that would include the consideration of green belt and metropolitan open land alongside protected sites, species and habitats is:

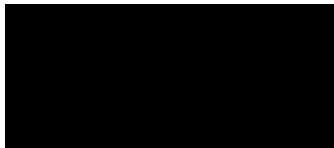
KPI: protection of the natural environment

Measure: the number of planning applications informed by and measured against the GiGL evidence base

This would commit applicants and local authorities to avoiding net loss and informing net gain at all stages of development control planning.

If any of our feedback is unclear or you would like to discuss ideas further, please don't hesitate to get in touch

Yours sincerely



Mandy Rudd
Chief Executive