



## **Draft New London Plan: Comments from the London Beekeepers' Association (LBKA)**

These remarks are submitted on behalf of the London Beekeepers' Association (LBKA). The LBKA is a volunteer-run members' organisation and registered charity that represents the interests of beekeepers and urban beekeeping in the London area. See [www.lbka.org.uk](http://www.lbka.org.uk).

LBKA activities prioritise the following objectives

- better beekeeping
- a better public understanding of bees
- a better London environment for bees

We have limited our comments to areas of the Plan relevant to bees and beekeeping: 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.

Comments are made on a “by exception” basis.

The main problems for honeybees (and indeed other bees) in London are:

- uneven distribution of forage (flowers providing nectar and pollen – pollinator food)
- habitat loss (green spaces; planting and management / design choices; development trends; paving over front gardens, etc.)
- pesticide use.

These challenges are common to many insect groups, not just bees.

LBKA has adopted an evidenced-based approach, and has been able to show that the concentration of beehives in central London is disproportionate to the forage available. There is a shortage of forage, especially in central parts of Inner London.

LBKA's response is to motivate and educate local groups (including companies, boroughs and others) to help:

- prevent further habitat loss
- improve existing green spaces for wildlife
- encourage new developments to provide biodiverse habitat.

Bees capture the public's imagination, so provide a useful hook to start discussions about what we can do to improve the environment.

### **General comments on Chapter 8 - Green infrastructure and natural environment**

- Given the pressures from development - 66,000 new homes per year, every year - 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 must be more emphasis on biodiversity as a key component of green infrastructure, and as an unquantifiable element of natural capital.
- We would urge that the Plan seeks to empower individuals to take actions to green the city and encourage biodiversity (in line with the new draft London Environment Strategy). This Plan must work at the “micro” level as well as at the “macro”.

#### **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 on Policy G1**

- LBKA welcomes the green infrastructure approach and the concept of ecosystem services. However, we think it is important that the inherent value of biodiversity is recognised, over-and-above the economic gains from ecosystem services.
- We welcome the requirement for Boroughs to produce Green Infrastructure Strategies. We believe that it is important that Biodiversity Action Plans and Habitat Action Plans are also retained and must be updated (many appear to be out-of-date).
- A firm deadline must be set for the production of Green Infrastructure Strategies, along with a requirement to refresh after (say) five years.
- The wording of Policy G1C should be strengthened, giving a stronger requirement for 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 on Policy G2**

- We strongly support the absolute protection of green belt land.
- There should be a presumption against the alteration of Green Belt boundaries that reduce its extent, and this should be included in Policy G2B.



**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 on Policy G3**

- Given the pressures on land use in London, we urge that MOL be protected, retained, and that public access is ensured.
- We welcome the recognition that MOL should be protected from inappropriate development, but this is undermined by Policy G3C and the provision for "land swaps". MOL is characterised by its "permanence", so land swaps are inappropriate.

**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>

**Comments on Policy G4**

- Policy G4 A should be extended and reworded to include public and private gardens in the same way as other green spaces.



- London has an estimated 3.8 million private gardens (Chloe Smith, GiGL, 2010). These contribute an habitat loss equivalent to an area 2.5 times Hyde Park per annum. One of the main reasons is conversion of front gardens into hard standing for car parking. In addition to removing invaluable natural habitat, this practice also contributes to an adverse environmental impact on water run-off, as well as degradation of the aesthetic of the streetscape. The LBKA urge that control/prevention of this practice is made a priority to reduce further unnecessary habitat loss.
- Policy G4 D opens the door to off-setting. This is not supported, as it encourages degradation of original biodiversity. The “replacement” is very rarely like-for-like. For example, removing a large native tree and replacing with several small ones does not equal “like-for-like”. Small trees take decades to reach the carbon capture and biodiversity value of a large tree.

**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 on Policy G5**

- We welcome the concept of an Urban Greening Factor, especially if it can encourage developers to include green infrastructure (and thus forage for bees) in their plans.
  - We expect that developers will “manage down” to the minimum target scores set by the Mayor, seeking the lowest cost ways to do so. Therefore, it will be important to set targets that drive the right outcomes.
  - 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.
- We welcome the emphasis on green roofs and walls, providing these are designed with biodiversity (and bees) in mind. We are concerned that the introduction of green roofs and walls might be used to justify the loss of existing green spaces - or as reasons to avoid including green spaces in developments.

**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 SINC's and green corridors. When undertaking comprehensive reviews of SINC's 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 on Policy G6

- We believe that it is important that this Policy is properly enforced. The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife.
- We support Policy G6 A about protection of SINC's.
- We especially support the specific mention of green corridors, as these can be disproportionately valuable for biodiversity (and bees) and for the well-being of residents and visitors.
- in this regard, LBKA has supported the "Making a B-Line for London" partnership that aims to develop B-Lines across London, increasing the diversity and abundance of pollinating insects across its green spaces and gardens (see <https://www.buglife.org.uk/b-lines-hub/making-a-b-line-for-london>). This project is currently seeking further funding.
- Off-site compensation is not supported, as it does not adequately compensate for the loss of on-site green space and associated biodiversity.
- Policy G6 D should be re-worded as "All new development should seek to achieve a net gain in biodiversity, and this biodiversity enhancement should be considered from the start of the development process. The importance of "no net loss of biodiversity" cannot be over-estimated.
- Brownfield land is an important habitat for many species including bees. Several national rare or scarce bees exist in Greater London and depend upon brownfield habitats for their survival, as do Black Redstarts. Before brownfield land is redeveloped, sites must be surveyed through a professional Environmental Impact Assessment to ensure that biodiversity is not inadvertently lost.



**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 [108]. 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.  
[108] Category A and B trees as defined by BS 5837:2012

**Comments on Policy G8**

- 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 trees that support biodiversity (this is often native species). For example, London Planes are resilient and have important heritage value, but produce neither pollen nor nectar and are very poor for biodiversity (and useless for bees).
- LBKA can advise on the biodiversity benefits of different trees.
- Hedgerows are also important, and this needs to be recognised:
  - The value of hedgerows should be recognised in Policy G7 B1 by explicitly specifying mature hedgerows alongside veteran trees and ancient woodland.
  - Policy G7 C should be amended so it reads as follows: "Development proposals should ensure that existing trees of quality, mature trees and hedgerows, and trees of value in terms of delivering ecosystem services such as water or air quality management, are retained.

**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 on Policy G8**

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



### **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's 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), to sustainable drainage and flood mitigation (Policies SI12, SI13), and makes an important contribution to well being and mental health of all Londoners.

### Submitted by

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