

# LONDON ASSEMBLY

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**Leonie Cooper AM**  
**Chair of the Environment Committee**

Sadiq Khan  
Mayor of London

(Sent by email)

18 March 2024

Dear Sadiq,

I am writing to share the findings of the Environment Committee's investigation into protecting and improving green spaces and greening grey infrastructure in London. The Committee held two meetings in relation to these issues. The first meeting on 20 December 2023 explored biodiversity in London and heard from the following guests:

- Abby Crisostomo, Head of Green Infrastructure, Greater London Authority (GLA)
- Alice Roberts, Head of Green Space Campaigns, CPRE London
- Navdeep Deol, Chair, National City Park Foundation
- Mathew Frith, Director of Policy and Research, London Wildlife Trust
- Jane Hull, Area Director – South East and London, Forestry Commission

The second meeting was held on 11 January 2024 and focused primarily on greening the road and transport network, with the following guests:

- Sam Longman, Head of Sustainability and Corporate Environment, Transport for London (TfL)
- Simon Powell Assistant Director, Land and Development, Housing & Land, GLA
- Alice Roberts, Head of Green Space Campaigns, CPRE London

- Deirdre Costigan, Vice Chair of the Transport and Environment Committee, London Councils
- Oliver Jones, Director of Recreation, Camden Council

The Committee have recommendations in four areas:

- 1) Maintaining existing protections for green spaces and strengthening processes to ensure that these are followed in practice;
- 2) Enhancing understanding of, and data coverage for, green spaces through London's Local Nature Recovery Strategy;
- 3) Engaging Londoners about the benefits of green spaces, through the National Park City concept;
- 4) Supporting kerbside strategies across London.

### **Maintaining protections for green spaces in the London Plan**

The Committee acknowledges there are protections for green spaces in the London Plan 2021.<sup>1</sup> However, we are aware that CPRE London has identified over 30 separate green spaces across London that are at risk,<sup>2</sup> affecting parks, playing fields and both Green Belt Land and Metropolitan Open Land, as a result of Local Plan Reviews.<sup>3</sup> Green space protections through the Mayor's London Plan need to be maintained, particularly at the local level.

New Local Plans developed by London boroughs must be in general conformity with the greening policies in the London Plan,<sup>4</sup> and it is important that you continue to proactively engage with Boroughs, to ensure that they are ambitious and protect green spaces appropriately.

As you know, Biodiversity Net Gain (BNG) is the legal requirement to ensure built developments deliver at least a 10 per cent increase in biodiversity.<sup>5</sup> The Committee notes that BNG has the potential to offer increased habitat creation in London. BNG was first introduced in the London Plan,<sup>6</sup> alongside the Urban Greening Factor which evaluates the amount and quality of urban greening provided by a development proposal. Four years after it was first introduced in the London Plan, we are pleased to see that BNG now forms part of National Planning policy.<sup>7</sup>

The Committee heard from Deirdre Costigan that Ealing Council is taking steps to go further than the existing 10 per cent target and is "pushing for a 20 per cent biodiversity net gain."<sup>8</sup> Further, she suggested the next iteration of the London Plan should review BNG:

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<sup>1</sup> Mayor of London, [The London Plan 2021](#), p. 317

<sup>2</sup> CPRE London, [Forever Green?](#), March 2022

<sup>3</sup> CPRE London [Green defenders: Saving London's parks and green spaces](#), March 2024

<sup>4</sup> [London Environment Strategy – Appendix 3 - Roles and responsibilities](#), 2018, p. 6

<sup>5</sup> UK Government, [World-leading Environment Act becomes law](#), November 2021

<sup>6</sup> Mayor of London, [The London Plan 2021](#), March 2021, p. 329

<sup>7</sup> Department for Environment, Food and Rural Affairs, [Understanding biodiversity net gain](#)

<sup>8</sup> London Assembly Environment Committee meeting, [Minutes](#), 11 January 2024, p. 7

“we are looking at setting targets that go beyond the London Plan for biodiversity net gain, for example, because we realise we probably need to even step up beyond that original target. That is potentially an opportunity for the next review of the London Plan, to look at what the evidence is to push that forward. We have produced our own local evidence in Ealing, and I know other boroughs also are looking at pushing beyond the London Plan requirements.”<sup>9</sup>

BNG is intended to support the mitigation hierarchy, which specifies that environmental harm that arises from a development “should be avoided, adequately mitigated, or, as a last resort, be compensated for.”<sup>10</sup> Alice Roberts from CPRE told the Committee that sometimes there is not sufficient information about the reasons why some developments are being allowed to proceed and questioned whether enough had been done to avoid or mitigate before compensating.<sup>11</sup>

There is also no requirement in the national guidelines for a developer to deliver off-site gains in biodiversity within the local authority of the development. This means a developer could buy off-site biodiversity units on the market instead to comply with the BNG policy.<sup>12</sup> Mathew Frith from London Wildlife Trust expressed concerns that the compensatory benefits of BNG might not benefit areas in London:

“There then becomes an issue that BNG has to deliver off-site units if it cannot deliver them on-site. There is a real concern expressed by many boroughs and by many non-governmental organisations (NGOs) that it would be cheaper for some of the big developers to effectively buy some farmland in the Midlands [...] and deliver all their off-site units that they cannot deliver in London there.”<sup>13</sup>

**Recommendation 1: The Mayor should maintain existing protections for green spaces in London, and explore ways to further strengthen the ability of London Boroughs to protect sites from inappropriate development through the planning process. Where the Mayor makes planning decisions involving mitigation or compensation, he should ensure full and transparent information is published around how all avenues to avoid harm have been explored, and call on boroughs to follow similar standards.**

**Recommendation 2: The Mayor should review the 10 per cent biodiversity net gain level in the London Plan, and consider increasing it further in the future to 20 per cent.**

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<sup>9</sup> London Assembly Environment Committee meeting, [Minutes](#), 11 January 2024, p. 6

<sup>10</sup> Natural England, [Biodiversity Net Gain Brochure](#), April 2022, p. 18

<sup>11</sup> London Assembly Environment Committee meeting, [Minutes](#), 20 December 2023, p. 1

<sup>12</sup> Department for Environment, Food and Rural Affairs, [Biodiversity Net Gain Essentials](#), January 2024

<sup>13</sup> London Assembly Environment Committee meeting, [Minutes](#), 20 December 2023, p. 9

## **London's Local Nature Recovery Strategy**

The GLA is responsible for London's Local Nature Recovery Strategy (LNRS), which is due to be completed by 2025.<sup>14</sup> The LNRS will contain a local habitat map and a written statement of biodiversity priorities.<sup>15</sup> We heard from guests that this should be used to deepen understanding of nature and improve the data quality on biodiversity across London, to help protect sites at risk from development.

There are a number of data sources that record data on biodiversity across London, such as Greenspace Information for Greater London (GiGL),<sup>16</sup> and the London Datastore.<sup>17</sup> However, we were told that the data required to inform important decisions is often not available. Alice Roberts told the Committee, "We do not know enough. There is a tonne of it [data] where we know literally nothing about it. To the point where I have looked at four different datasets and they all say something completely different about one space."<sup>18</sup>

Matthew Frith from the London Wildlife Trust shared with the Committee his concerns that developers or consultants do not submit the data that is collected as part of the planning application process into the GiGL database. Given this, he told the Committee "there should be some explicit requirements in local plans and London Plan policy that ... enough data is there [recorded in GiGL] to inform decisions."<sup>19</sup>

The lack of data available has implications for the ability to identify sites at risk from development. It is vital that these are enhanced to provide accurate information about habitats and biodiversity.

**Recommendation 3: The Mayor should use the opportunity of London's Local Nature Recovery Strategy to improve data collection around green spaces and biodiversity across London, including street trees, green corridors and habitats, across both publicly and privately owned land. This should include stronger requirements for developers to record baseline and changes to sites on GiGL in a timely manner.**

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<sup>14</sup> Department for Environment, Food & Rural Affairs, [Local nature recovery strategies](#), 30 June 2023

<sup>15</sup> Department for Environment, Food & Rural Affairs, [Local nature recovery strategies - GOV.UK \(www.gov.uk\)](#), 30 June 2023; London City Hall, [Local Nature Recovery Strategy](#)

<sup>16</sup> Green Information for Greater London (GiGL), [Open Spaces](#)

<sup>17</sup> London Datastore, [London Green and Blue Cover](#)

<sup>18</sup> London Assembly Environment Committee meeting, [Minutes](#), 20 December 2023, p. 12

<sup>19</sup> Ibid, p. 9

## **Engaging Londoners through the National Park City concept**

London became the first National Park City, acquiring status in July 2019.<sup>20</sup> During our investigation, we heard there is more that can be done to engage individual Londoners around the concept of London as a National Park City. Navdeep Deol, Chair of the National Park City Foundation, told the Committee about the great benefits that the National Park City can bring to Londoners:

“It is much broader than just environmental issues. It focuses on wellbeing, on sport, on health, on history, on culture and on the wider landscape of London as an entire city [...] The other point I would just make about the benefit is it brings communities together. There is something incredibly powerful about having people involved in nature, involved in the environment, involved in all of these activities, sharing time, sharing resource, sharing knowledge.”<sup>21</sup>

At the Environment Committee’s question and answer session in March 2024, Catherine Barber, Assistant Director for Environment and Energy at the GLA stated that there was work on community engagement underway:

“The Foundation [...] is doing some work for us around sites of (importance for) nature conservation interest, which will then feed into the LNRS work. We are funding it and it will come up with a community engagement plan for boroughs - because it cannot just be the GLA reaching out. It is something that should really go more local than that. They are going to help us with designing that and then rolling it out.”<sup>22</sup>

This is an encouraging sign, but there is still more potential to use the concept and language of London as a National Park City to inspire people to see their city differently and engage with nature in new ways. For example, there are still inequalities in terms of access to green spaces in London. The London Wildlife Trust concluded in March 2023 that “young women and non-binary people of colour are keenly interested in engaging in conservation and green spaces, but may be limited in their environment due to perceived barriers and inaccessibility of particular spaces.”<sup>23</sup>

**Recommendation 4: In response to this letter, the Mayor should provide the Committee with an update on the work to develop a National Park City Community Engagement Plan for boroughs, including:**

- **How it will use the National Park City concept to engage people across London with nature and to see their city differently;**
- **Future initiatives to use the National Park City concept to increase the diversity of people accessing green spaces, and work to correct historic inequities of access.**

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<sup>20</sup> National Park City Foundation. [Timeline of the National Park City movement](#)

<sup>21</sup> London Assembly Environment Committee meeting, [Minutes](#), 20 December 2023, pp. 38-39

<sup>22</sup> London Assembly Environment Committee meeting, transcript, 6 March 2024

<sup>23</sup> Wild London, [Research Report - Seeding Change \(Update Nov 2023\)](#), March 2023, p. 5

## **The importance of trees in London**

In December, Jane Hull from the Forestry Commission told the Committee of the vital importance of street trees, which she described as “almost the kind of green capillaries of the network” in urban areas.<sup>24</sup> Alice Roberts from CPRE London also stated that “nature’s recovery is dependent upon green corridors so those need to be created.”<sup>25</sup>

Currently 21 per cent of London is under tree canopy cover, and the Mayor has a target to increase this by 10 per cent (up to 23.1 per cent) by 2050.<sup>26</sup> However, the last publicly available data was released in 2018,<sup>27</sup> and an update will not be published until later in 2024.<sup>28</sup> The Committee heard that there will likely be little progress made on canopy cover in this update. In the Committee’s question and answer session in March 2024, Catherine Barber told the Committee:

“It [the GLA’s canopy cover update] will not show a massive change if a change at all. [...] even a five-year interval would not show a change [...] because of [...] the age of the tree planted, the time of year the tree imagery is collected, the type of tree, let alone the complications of checking it. We have had drought, dry weather and all of those things.”<sup>29</sup>

The Committee welcomes the fact that significant numbers of trees are being planted in London, the 500,000th being planted in December 2023.<sup>30</sup> <sup>31</sup> However, we note that there is no publicly available record of those that are being removed. Without a detailed assessment of tree cover, it is difficult to assess if the trends are in the right direction. While we understand that trees do sometimes need to be removed for safety reasons, as Abby Crisostomo acknowledged in the meeting,<sup>32</sup> it will take decades to replace mature trees.

**Recommendation 5: The Mayor should work with local councils to ensure that there is a systematic process for recording the removal of mature trees in areas where the council in question has responsibility.**

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<sup>24</sup> London Assembly Environment Committee meeting, [Minutes](#), 20 December 2023, p. 20

<sup>25</sup> Ibid, p. 19

<sup>26</sup> Greater London Authority, [London Environment Strategy: Fourth progress report \(2018-2024\)](#), March 2024, p. 13

<sup>27</sup> London Datastore, [London Tree Canopy cover](#)

<sup>28</sup> Greater London Authority, [London Environment Strategy: Fourth progress report \(2018-2024\)](#), March 2024, p. 13

<sup>29</sup> London Assembly Environment Committee meeting, transcript, 6 March 2024

<sup>30</sup> Greater London Authority, [Mayor invests £500,000 into street tree-planting across London as he delivers half-millionth tree of Mayoralty](#), 1 December 2023

<sup>31</sup> Emma Best and Tony Devenish welcome the planting of additional trees, but wish to note their dissatisfaction that the Mayor has not planted 2 million trees, as reportedly promised in an interview in the Guardian in September 2015 and in a Tweet posted on his official Twitter account on 24 November 2015. We wish to see the Mayor commit to a fixed tree target and meet it.

<sup>32</sup> London Assembly Environment Committee meeting, [Minutes](#), 20 December 2023, p. 32

Transport for London (TfL) has a target of increasing TfL-wide canopy cover by 10 per cent by 2050, and intend to publish a tree canopy cover plan by March 2025.<sup>33</sup> TfL provided the Committee with data after the Committee's January meeting. This data shows that in three of the last seven years TfL removed more street trees than it planted, resulting in a net reduction in trees.<sup>34</sup> Overall since 2016-17 TfL has planted 5765 trees, but have removed 4,077 trees, meaning that the overall number has increased from 23,107 to 24,795, a seven per cent increase in seven years.<sup>35</sup>

The Committee notes the commitment in TfL's recently published Green Infrastructure and Biodiversity Plan to publish a tree canopy cover plan by March 2025,<sup>36</sup> which could be an opportunity to review TfL's targets.

Given the time it will take for the canopy cover assessment to reflect changing activity in terms of tree planting, the Committee considers that there should be additional proxy measures to assess progress towards this overall target. This should include an assessment that goes beyond tree planting to also include the net change in the number of trees, and numbers of trees reaching maturity.

**Recommendation 6: The Mayor should consider updating his greening targets to go beyond canopy cover to include additional targets that measure the net change in numbers of trees, and survival rates of new trees. This could include a new target for the number of trees the Mayor is aiming to plant.**

**Recommendation 7: TfL should increase its tree planting targets to ensure that there is a larger net increase in numbers of trees, and that the trees planted are adequately looked after to ensure that they survive to maturity. TfL should ensure that the evidence base to inform its forthcoming tree canopy cover plan considers maintenance.**

### **Supporting kerbside strategies and parklets**

The Committee heard that several London boroughs have launched kerbside strategies, which can "allocate road and kerb space in accordance with clear use hierarchies."<sup>37</sup> Lambeth's strategy won the Sustainability category at the annual Chartered Institution of Highways and Transportation (CIHT) award in 2023.<sup>38</sup> Changes made as a result of this policy include the creation of 34 rain gardens spanning a collective area of over 300 square metres, in nine locations.<sup>39</sup>

Deirdre Costigan commented that other boroughs are also developing their own strategies. She stated that:

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<sup>33</sup> Transport for London, [Green Infrastructure and Biodiversity Plan](#), 7 March 2024, p. 18

<sup>34</sup> Transport for London, response from the Head of Sustainability and Corporate Environment, 8 March, p. 1

<sup>35</sup> Ibid, p. 1

<sup>36</sup> Transport for London, [Green Infrastructure and Biodiversity Plan](#), 7 March 2024, p. 18

<sup>37</sup> Centre for London, [Reclaim the kerb: The future of parking and kerbside management](#)

<sup>38</sup> Love Lambeth, [Lambeth wins top award for Kerbside Strategy](#), June 2023

<sup>39</sup> Meristem Design, [The Green Vision of Lambeth's Kerbside Strategy](#)

“Hounslow also has recently agreed a Strategy and other boroughs are incorporating elements of kerbside strategies in their existing transport plans. As an example, in Ealing, we have implemented a pilot programme called Free Range Urban Neighbourhoods. That is all about bringing greening and play [...] to our streets.”<sup>40</sup>

There is clearly further potential for kerbside strategies to bring together a range of issues to support the aims of the Mayor's Transport Strategy and London Environment Strategy, including flood risk and greening streets. Deirdre Costigan explained that kerbside strategies can provide nature-based solutions to flood risk, as “the reason [...] we [local authorities] put a tree outside your house is because we are trying to stop your area flooding every few years.”<sup>41</sup> The Committee also heard from Alice Roberts that “on the whole of the TfL network there is work going on to create a kerbside strategy for the Transport for London Road Network (TLRN).”<sup>42</sup>

The Committee also heard that parklets are replacements for former road space that can be used for other purposes, such as growing fruit and vegetables and to allow people to socialise,<sup>43</sup> and “a space for people to sit.”<sup>44</sup>

**Recommendation 8: The Mayor should ensure that Transport for London encourages all Councils to complete a kerbside strategy by January 2025, which clearly outlines actions to increase biodiversity, including targets for Sustainable Drainage Systems (SuDS) and numbers of new parklets for the period 2025-2030.**

I look forward to hearing from you, with your response to our recommendations. The Committee would welcome a response by 31 May 2024. Please address your response to Richard Clarke, Senior Policy Adviser, at [Richard.Clarke@london.gov.uk](mailto:Richard.Clarke@london.gov.uk).

Yours,



**Leonie Cooper AM**  
**Chair of the Environment Committee**

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<sup>40</sup> London Assembly Environment Committee meeting, [Minutes](#), 11 January 2024, p. 17

<sup>41</sup> Ibid, p. 25

<sup>42</sup> Ibid, p. 16

<sup>43</sup> Possible, [Parklets](#)

<sup>44</sup> London Assembly Environment Committee meeting, [Minutes](#), 11 January 2024, p. 20