

Your Ref:

Our Ref: LBL/NG/RS/DRLLP/SINCS



Monday 9<sup>th</sup> November 2020

## **Draft Revised Lambeth Local Plan (DRLLP) – SINCS and SINC Designations**

### **1. Introduction**

As of August 2019 the London Borough of Lambeth contains 45 Sites of Importance for Nature Conservation (SINCS) of varying origins, functions, sizes and locations. It contains one large Metropolitan SINC - the River Thames and its foreshore ('Tidal Thames') where it occurs within the borough's legal boundary.

Lambeth contains 20 Borough SINCS which include Brockwell Park, Clapham Common, Streatham Common, Ruskin Park and West Norwood Cemetery, but also a small number of sites normally inaccessible to the general public but still designated for their biodiversity importance, including railway lineside land. Lambeth also contains 24 Local SINCS which include local parks, allotments, churchyards and school grounds.

### **2. Determination of SINCS in Lambeth**

Lambeth's policy with respect to SINCS is that they can be both on public (i.e. council-owned or managed) or on private land. With private land this can be owned and maintained by a non-departmental government body (NDGB) such as Network Rail or Transport for London (TfL), a statutory utilities operator, a social housing provider or a private landowner.

In addition, SINCS can be open access or restricted access. Although we aspire to have all of Lambeth's designated nature conservation sites, e.g. SINCS, Local Nature Reserves (LNRs) or Sites of Special Scientific Interest (SSSIs), as open access 24 hours a day, this may not be possible for various justifiable reasons.

Examples of this need for 'restricted access' include operational railway land (for obvious public safety and safe running of the rail network) or land that is part of a school, allotment or community garden, where there may be a need to limit free access for resident or user safety and welfare, or to manage trespass, vandalism or theft.

There are also examples of SINCS in Lambeth where they constitute part or all of a private garden or the grounds of a privately-managed estate; three examples of this category include Durand Gardens in Stockwell, which is managed by residents of the estate, Lambeth Palace Gardens, which is part of the private residence of the Archbishop of Canterbury, and South London Botanical Institute (SLBI), which is a private botanical and educational facility.

In such cases, access has to be carefully controlled, but there are various events organised through the year which allow the public free access to the site, to visit and experience each site, especially their heritage, landscape and ecology.

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In addition council officers make arrangements to visit each designated site to assess them for ongoing management and improvement, and are working with the landowners or site managers as to developing management plans, undertaking surveys and collating and recording data on notable habitats and species, using this to build up a site database and then the relevant SINC citation.

### **3. Designation of new and proposed SINC's in Lambeth**

When a new SINC site is identified, this can be through a variety of reviews or assessments of sites of nature conservation interest in the borough. One of the most important is a review undertaken by competent surveyors, often third party if not council staff, who are able to make a valued assessment and professional judgement as to whether a particular site merits consideration for formal designation and adoption as a SINC.

Where possible any proposed SINC's would be visited to determine if they warrant consideration, or this assessment can be based on previous information as to the ecological and landscape interest or value of the site. In some cases if the site is difficult to get into, for operational or access reasons, this might be a 'walk around and look through' visit, using high powered binoculars, aerial photography (or drones) and cameras to identify any features, including habitats, that would warrant consideration as a SINC.

It is not essential that a detailed, on-the-ground, species by species survey of a potential SINC has to be undertaken before it can be proposed as such. SINC's by their very nature are dynamic sites, and any survey undertaken on one day or month will probably not reflect the overall species composition or the relative distribution and abundance of individual habitats and species present on that site and through the whole year.

There are many cases where 'walk around and look through' visits can adequately determine the ecological value of a site, in demonstrating the types, distribution and diversity of habitats present, and their relative quality, how they are being managed and what future management options could be considered for it.

SINC's are also determined as to how they contribute to biodiversity at a local and regional scale. It's not just what they contain within a site, it's how they will serve as a valuable 'stepping stone' for nature and allow wild species to migrate and colonise an area, becoming part of the local 'green infrastructure'. Therefore potential SINC's must be seen in context of where they are located, and what contribution they make to allowing nature to be retained but also better interconnected to a network of various sites.

It may well be what is around and adjacent to a potential SINC that is as important as determining if it will be one. A site that is between two existing SINC's which are, for example, railway lineside habitat, might be of considerable local or borough significance in that it acts as the vital 'connector' between those SINC's.

By being designated this better secures the ability of nature to move easily between individual areas of biodiversity importance, as well as existing within the confines of the new SINC site. Therefore, surveyors will also look closely at the actual size, position and context of any potential SINC as much as the site itself.

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It is the professional judgement of both the surveyor(s) and the council which plays a critical part in determining if a site should be considered as a potential SINC, based on what background knowledge there is as to habitats present, species present (if recorded) and what value the site will provide for wildlife in the local vicinity.

Once a site has been recommended as a potential SINC, or is adopted as one, this initiates the process of liaising with the landowners and land managers to not only further survey the site, so as to develop the relevant SINC citation, but also to help with appropriate management advice and proscriptions. Citations start off being very limited, but as more information and data is obtained, they become more informative and help with site management or use.

Being a SINC does not mean development or change is forbidden, rather it should be of a type that provides a balance between the needs of people and nature. In fact it helps secure a better standard of management that is more focused and ensures the land owner/manager is able to continue to maintain and operate the site without the risk of coming into conflict with nature, or nature becoming a hindrance to future changes in land use or content.

Many a public park, common, allotment or stretch of operational railway land is a SINC, and this does not prevent other uses of the site at all. In fact a SINC designation recognises how a site is being managed and used to provide a multifunctional asset that benefits wildlife as well as the requirements of human occupiers.

As an example, the recent development of the new ‘Lambeth Palace Library’ on the northern part of the ‘Lambeth Palace Gardens Borough SINC’ in Waterloo involved construction of a new building on a section of the designated SINC site. The proposed development was able to be accommodated into the SINC and appropriate measures and mitigations were secured so as to ensure any impacts upon biodiversity were minimised or eliminated.

These measures included the loss of an existing pond and areas of open or boundary habitat, but extensive ecological assessments prior to the development were used to inform an appropriate impact management strategy and to ensure that the rest of the SINC was not affected. The old pond will be recreated in a new location close to the new building but using transplants of the original vegetation, as well as returning invertebrates and other aquatic animals back to it from off-site ‘holding stations’. The new library building will have a biodiverse living roof and extensive pollinator-friendly planting, which has been designed to improve the species and habitat diversity of the SINC, which will secure the continued status of the whole SINC without affecting the site’s use as a private residence or the use of the new library.

### **4. Lambeth SINC Review 2018**

London Wildlife Trust (LWT) was commissioned by Lambeth Council in April 2018 to undertake a review of the borough’s 45 SINCs, in line with current SINC review methodology detailed in the Mayor’s Environment Strategy (2018). A series of desk studies assessed each site for potential boundary changes (loss or gains to SINC habitat) against the SINC selection criteria, and field surveys were undertaken between June and August 2018 where this was either necessary to ground-truth these initial assessments, and where free access was available or could be secured.

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The desk and field surveys were undertaken by professional field ecologists with assistance from equally experienced and skilled council officers, to determine site condition and suitability. This also included assessing if new sites could be considered as potential SINC and if so with what evidence and under what grading (e.g. local, borough or metropolitan).

The proposed recommendations of the Lambeth SINC Review were as follows:

- 1 x Metropolitan Grade SINC is retained (River Thames);
- 1 x extension to the Tooting Bec Metropolitan SINC within the Borough of Lambeth;
- 20 x Borough Grade SINC are retained;
- 23 x Local Grade SINC are retained, BUT:
- 1 x Local Grade SINC, Norwood Park, proposed to be upgraded to a Borough Grade SINC;
- 18 x boundary changes are adopted to either incorporate or remove land (or both);
- 2 x currently non-SINC sites are proposed to be graded as Borough SINC; and
- 1 x currently non-SINC site is proposed to be graded as a Local SINC.

These recommendations, if adopted in full, will have the following key changes to the SINC and environment of Lambeth:

- Lambeth will have 49 new SINC (including part of a second Metropolitan SINC);
- A **decrease in Areas of Deficiency in access to nature (AoD) in two (s) locations** as a result of Norwood Park being upgraded to a Borough SINC, and the extension and improved access to the existing Roots and Shoots Borough SINC in the north of Lambeth;
- **Three (3) new SINC, which represent an additional area of 6.8ha in the borough;**
- 2.6ha of land (over eight existing SINC) will be removed as part of boundary change proposals, due to their being of low or limited ecological value;
- **18.8ha of land (over 15 existing SINC) will be added as part of the boundary change proposals, due to their being of good or excellent ecological value;**
- Minor corrections to some existing SINC boundaries as a result of digitising errors, which accounts for 0.5ha removed and 1.2ha added across all of the sites.

### 5. Lambeth Site Selection Panel and Local Wildlife Sites Board

A small SINC Selection Panel was held in March 2019 with the purpose of validating the process followed by Lambeth Council, that LWT had followed the correct processes in identifying and assessing both existing and new candidate SINC or other sites, and that sites that had been recommended by the council or community stakeholders had been fairly considered as SINC, whether or not they were duly assessed to merit this designation.

The SINC Selection Panel meeting was attended by 8 people, who provided representation for Lambeth Council (Parks), Lambeth Parks and Greenspaces Forum (LPGSF, representing 28 different park and open space user groups), and Incredible Edible Lambeth (which represents gardeners and growers across 90 sites in the borough).

The Panel supported the recommendations made in the Lambeth SINC Review, with no requests for amendments, additions or deletions; it was felt that the review process and the recommendations made were fair and balanced, and supported by appropriate evidence.

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The Panel also supported inclusion of the changes in existing SINC and creation of new SINC in a new Lambeth Biodiversity Action Plan (released June 2019) and in the Proposals Map for the Draft Revised Lambeth Local Plan.

In October 2019 the LWT SINC Review report, and the comments/endorsement of the SINC Selection Panel were submitted to the 'London Local Wildlife Sites Board (LWSB). The LWSB is managed by the Greater London Authority (GLA) and consists of members from various local authorities as well as the GLA.

LWSB provides an impartial yet competent scrutineer of any proposals from local authorities to designate (or even de-designate) SINC and other nature conservation sites, and can challenge an application as to any discrepancies or omissions in the evidence base or justifications, as well as the quality and rigour of any background surveys or assessments on which these proposals are being made.

Lambeth's submission was scrutinised in detail by LWSB and was endorsed on 14<sup>th</sup> October 2019 – there were no recommendations to remove or add any existing or new SINC, and the quality of the background information was determined to be sound. A copy of the letter from the LWSB to the London Borough of Lambeth is attached.

### **6. Revision to the Lambeth Local Plan – Consultation Outcomes**

As part of the process for reviewing and updating the Lambeth Local Plan 2015, to take account of changes in national and regional policy, including the national Planning Policy Framework (NPPF), a period of consultation on the key changes to and recommendations in the revised plan was undertaken with local residents and other stakeholders.

Documents available as part of the consultation process included the Lambeth SINC Review, along with recommendations as to changes to existing SINC (including extensions or reductions of site boundaries) and additions of new SINC.

The consultation process ended on 17<sup>th</sup> December 2018 and responses were collated by the Lambeth Planning Policy Team. The only initial questions raised by consultees at this stage related to modifications to increase the boundaries of some existing railway lineside Borough SINC in West Norwood, regarding whether this could compromise any future extensions to or widening of railway platforms to accommodate planned increases in railway capacity.

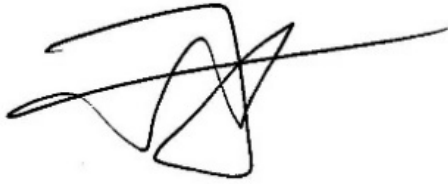
However, we were able to confirm that the proposed changes would not compromise or conflict with future rail capacity requirements, and Network Rail had not objected to these proposals. In fact ongoing discussions with Network Rail over proposed signalling and track control works, as part of their ongoing capital investment programme, have demonstrated that Network Rail are fully aware of SINC that they own and manage, and that their planned maintenance and improvement works will not conflict with those designations, nor would these designations impair or restrict their activities or planned investments.

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This demonstrates, along with the recent development of Lambeth Palace Library, how designation of a site as a SINC does not impede or impair the ongoing management and improvement of land in private ownership. In fact it can act as a tool to help facilitate appropriate change and development, which is one of the key tenets of designating sites for their nature conservation value – sites need managing to protect their biodiversity as much as for their human and/or other operational purposes.

On behalf of the London Borough of Lambeth

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

**Dr Iain Boulton**  
**Environmental Compliance Officer**

**Lambeth Parks & Open Spaces**  
**Environment & Streetscene**  
**Resident's Services**  
**London Borough of Lambeth**  
**Telephone: 020 7926 9000**  
**Email: [parksdevelopment@lambeth.gov.uk](mailto:parksdevelopment@lambeth.gov.uk)**

**By email**

**Department: Environment**

Date: 14<sup>th</sup> October 2019

Dear Iain,

**Sites of Importance for Nature Conservation Review - Lambeth**

I am writing to you in my capacity as Chair of the London Wildlife Sites Board (LWSB). The LWSB was established to ensure that the selection and approval of Sites of Importance or Nature Conservation (SINCs) by London Boroughs is consistent with:

- national policy as set out in the National Planning Policy Framework
- national guidance set out in Local Sites – guidance on their identification, selection and management (Defra, 2006)
- regional policy as set out in The London Plan and Appendix 5 of the London Environment Strategy (GLA, 2018)
- regional guidance in the London Plan Implementation Report London's Foundations (GLA, 2009)

Boroughs are not obliged to consult the LWSB on their site selection and review process. But seeking the views of the LWSB about the scope, approach, and outcome of any review helps to demonstrate that the review has been transparent and consistent with the existing policy framework in London. The views of the LWSB should be sought when the Borough is seeking to select a new Site of Metropolitan Importance (SMI) for nature conservation or to change the boundary or status of an existing SMI.

The LWSB recommends that all Boroughs share the outcomes of SINC reviews with Greenspace Information for Greater London CIC.

Yours sincerely



Samantha Davenport  
Chair, London Wildlife Sites Board

## APPENDIX 1

### London Wildlife Sites Board Advisory Comments

Set out below is a summary of your submission, and the LWSB comments on your Borough's process for selecting or reviewing Sites of Importance for Nature Conservation (SINCs). As the primary role of the LWSB is to comment on the process of selection or review, the LWSB comments relate to: survey of sites; the review or selection methodology; the local site selection panel; plus, observations on the outcomes of the selection or review process. Where appropriate there are LWSB comments on proposed changes to Sites of Metropolitan Importance.

<b>Borough:</b>	Lambeth
<b>Documents:</b>	Review of Sites of Importance for Nature Conservation in Lambeth. London Wildlife Trust, 2018. LB Lambeth SINC Review Summary submitted by the Borough for LWSB meeting.
<b>Submitted by:</b>	Dr Iain Boulton, Environmental Compliance Officer.
<b>Date of LWSB meeting:</b>	4 <sup>th</sup> October 2019
<b>LWSB Members:</b>	Samantha Davenport – Greater London Authority Chloe Smith - Greenspace Information for Greater London Laura Kuurne - Greenspace Information for Greater London John Archer – London Borough of Tower Hamlets (by email) Laurie Baker – London Geodiversity Partnership Francis Castro – London Borough of Redbridge
<b>Site Survey</b>	A full desk-based review and partial site survey. The selection of sites for survey was informed by a risk-based approach to identify sites which may have reduced or improved in quality since the last review. The review was undertaken by London Wildlife Trust with field surveys in July and August 2018 following the approach set out in the GLA's SINC selection guidance (2018).
<b>Local panel</b>	Yes. A SINC selection panel was convened as part of the Borough's Parks and Greenspaces Forum. It included a wide range of relevant local interest groups.
<b>Outcome</b>	<ol style="list-style-type: none"> <li>1) Proposed extension to Tooting Common SMI (M124) to incorporate land within LB Lambeth.</li> <li>2) Retention of 23 Borough SINCs and 23 Sites of Local Importance.</li> <li>3) Uplift of 1 Site of Local Importance to Borough status and the identification of 2 new Borough SINCs.</li> <li>4) Identification of 1 new Site of Local Importance.</li> <li>5) Minor boundary changes to Borough grade SINCs and Sites of Local Importance.</li> </ol>



### LWSB Comments on Review Process

- The review was undertaken with a sound understanding of the policy and procedures recommended by the London Plan. The review is, therefore, sufficient in order to identify SINC's for the purposes of the Local Plan.
- Local knowledge and stakeholders were engaged in the process through the consultation undertaken through the Lambeth Parks and Greenspaces Forum.
- The proposed extension of Tooting Common SMI to include the land known as Woodfield Recreational Ground and Streatham and Clapham High School Scrub is supported by the LWSB. The area is contiguous with the existing SMI and includes ecologically similar and complementary habitats. The LWSB also note that the land would probably have been included in the original SMI if it were not sited across an administrative boundary. The proposal is consistent with the approach taken elsewhere in London (on advice from the LWSB) that where land that is contiguous with and supports the ecological function of a SMI site, it should be identified as part of the SMI and included in its boundary.
- The LWSB endorses the SINC review process undertaken by the London Borough of Lambeth.