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At Home with Nature

Encouraging biodiversity in new housing developments

Housing Committee

January 2017

Holding the Mayor to account and investigating issues that matter to Londoners

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The Housing Committee scrutinises the Mayor's role and record in delivering the private, social and affordable homes London needs.

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London has always changed. Across the centuries, London has been home to many people. Londoners have always lived alongside a wide diversity of other residents too - horses, dogs, cats, birds, bats, bees, bugs and butterflies, to name a few.

Currently, change in London is speeding up, especially the growth in the number of people who make the city their home. Many people choose to make London their home, and enjoy living here, because of its parks and green open spaces. Over 47 per cent of London is green.

During this investigation, I have had the pleasure of seeing first-hand some fantastic new housing developments across London that have truly incorporated nature. I would like to thank those who freely gave up their time to accompany me on these site visits. I would also like to thank those who helped in providing evidence to this review. This investigation, and the report that follows from it, makes a series of recommendations to the Mayor to ensure that London maintains and improves on its current levels of biodiversity, as it continues to grow and change.

Moving forward, we need to remain focussed on maintaining London as a green jewel as we attempt to solve London's other problems, especially the shortage of housing. We need to see fantastic new homes developed that incorporate biodiversity to make sure all Londoners can be at home with nature.

Leonie Cooper AM

Summary

There is a risk that London will see its biodiversity being squeezed or reduced as planners and developers try to increase housing density in the city. Nature provides physical, mental, social, environmental and economic benefits for city dwellers, but both flora and fauna are rapidly decreasing in UK cities. The Mayor has an important role in ensuring biodiversity is enhanced and new habitats are created, as London attempts to tackle the housing crisis.

Biodiversity is part of national, regional and local planning policies. Collectively, these policies provide a good overall strategic vision for providing for nature in London. Unfortunately, these policies are not always translated at ground level.

Some European cities explicitly recognise the importance of green infrastructure and the environmental, social and economic benefits it provides. Several cities have introduced a planning tool called a 'green factor' or 'green space factor' (GSF) to ensure a minimum level of greenery in new developments. This planning tool has increased levels of green space and improved resilience to flooding and climate change impacts in these cities.

There are inconsistences at borough level when it comes to approving planning applications. This is due to lack of ecology expertise within planning departments and other pressures, for example housing target pressures, which can impact on the decisions of the authority. Funding cuts have reduced the capacity of planning departments.

Developers are sometimes uncertain of the steps needed to promote biodiversity and therefore the cost of doing so. The historic emphasis on protecting key species sometimes worries developers and mean some avoid biodiversity entirely. However, some developers clearly do value biodiversity on their sites and include biodiversity adaptations and green infrastructure where it is feasible. The inclusion of biodiversity and green infrastructure in a site has been shown to increase the chances of receiving planning permission with fewer conditions, positively affecting prices paid and speeding up the rate of sales.

This report explores the current situation and offers some potential solutions to ensure that London maintains and improves on its current levels of biodiversity, as it continues to grow and change.

Recommendations

A strategic view of nature	**Recommendation 1** The Mayor should amend the London Plan to include the wording 'net gain' similar to the LLDC policy, to ensure biodiversity is enhanced and created, not just protected.
	Recommendation 2 The Mayor should ensure biodiversity is integrated within the masterplanning process, ensuring a whole area approach is taken in opportunity areas, housing zones and development corporations that are deficient in biodiversity and green space, or areas which are suffering with environmental issues (e.g. flooding, urban heat island effect, air pollution).
	Recommendation 3 The Mayor should showcase new learning at the OPDC, highlighting how sites can be built in high densities while still increasing the levels of biodiversity.
Green infrastructure	**Recommendation 4** The Mayor should consider the possibility of implementing a green space factor in London, similar to that in place in Berlin and Malmö, and pilot this scheme in opportunity areas, housing zones and developments of strategic importance.
Increasing biodiversity on the ground	**Recommendation 5** The Mayor needs to bridge the gap between the strategic vision of the London Plan and practice on the ground at borough level through the creation of a Biodiversity in Housing SPG.

	Recommendation 6 The Mayor should encourage planning departments to request a minimum baseline survey through Greenspace Information for Greater London (GiGL), or others, to accompany all planning applications in order for planning departments to make an informed decision.
	Recommendation 7 The Mayor should request that all developments share ecological data with Greenspace Information for Greater London (GiGL), after a development is completed. This would allow data gaps to be closed and effective monitoring through GiGL searches and updates.
	Recommendation 8 The Mayor should provide resources (start-up funding/seed capital) to the 'Partnership for Biodiversity in Planning', which is working to simplify, streamline and improve the consideration of biodiversity in the planning process.
Raising awareness	**Recommendation 9** To raise awareness of the importance of biodiversity in housing the Mayor should sponsor an award category for biodiversity adaptations in housing developments through the BIG Biodiversity Challenge.
	Recommendation 10 The Mayor should commission a source of best practice guidance, which includes different options for temporary and permanent measures, price and maintenance information and how these measures could be included in the service charge, for those items that will be maintained on site after the development is complete.

Introduction

London is still one of the greenest cities in the world but, in the rush to tackle the housing crisis, there is a risk that opportunities to protect and enhance local flora and fauna are being lost. In order to build the homes that London needs, a large proportion of these homes will be built on brownfield land and at higher densities. An increased housing density could lead to a more fragmented environment for nature, reducing biodiversity and access to nature for Londoners.

Although nature provides physical, mental, social, environmental and economic benefits for urban dwellers, both flora and fauna are rapidly decreasing in UK cities. The 2016 State of Nature report showed that, in the UK, 56 per cent of species are in decline and 7 per cent of urban species are threatened with extinction.[1] For example, London's hedgehog population has dropped by 50 per cent since 2000.[2] This is a further concern for London government as nature can also improve the city's resilience to climate change and can help mitigate issues associated with high density living, such as flooding and the urban heat island effect, thereby generating financial savings in the long term.

Woodberry Down Nature Reserve © Berkeley Homes

The Mayor has an important role in ensuring biodiversity is enhanced and new habitats are created. A large proportion of new homes will be built on public land and will be subject to Mayoral planning approval if they are of potential strategic importance to London.[3] This means that the Mayor can, and should, push for higher requirements for biodiversity on these sites in order for planning permission to be granted.

1. A strategic vision for London

Key findings

- The London Plan provides a strong framework for biodiversity but this is not being translated at ground level.
- The wording of the London Plan allows wiggle room for developers to do no more than the minimum – protecting what is already on site.
- The Mayor has the opportunity to raise the bar for biodiversity provision in opportunity areas, housing zones and development corporations.

Biodiversity at a national level

1.1 National, regional and local planning documents have promoted biodiversity since the Rio Earth Summit in 1992. Biodiversity 2020, an England-wide Biodiversity Strategy, was published in 2011 setting out the how the government will implement national and international commitments to help stop biodiversity loss by 2020.[4] The National Planning Policy Framework (NPPF), published in 2012, requires planners to minimise impacts on biodiversity and provide net gains in biodiversity where possible.[5] Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 provides that all local authorities in the UK have a duty to conserve biodiversity.[6] Both the NPPF and the NERC are UK wide policies and must feed into regional and local planning decisions.

1.2 The GLA first created a Biodiversity Strategy in 2002. This sets out how the GLA would, across all its activities, seek to protect and conserve biodiversity, preventing the loss of existing wildlife habitat and increasing contact with nature. However, it has not been updated since its publication and is currently under review. The London Assembly Environment Committee discussed the review of this policy in 2015 and highlighted that a lack of ecological expertise in planning departments and the lack of biodiversity monitoring data would make implementing an updated biodiversity strategy more difficult.[7]

London's plan for nature

1.3 The London Plan provides a strategy for transport, environmental and social development for London. The London Plan has included biodiversity since its creation in 2004. This included the creation of a London wide Biodiversity Action Plan (BAP), and called for each London borough to implement its own BAP (but this was not mandatory). BAPs highlighted priority species and habitats which must be taken into account in planning decisions. However, the London-wide BAP disbanded in 2013.

1.4 This review has found that the London Plan provides a solid framework for biodiversity in planning, (especially Policy 2.18 and 7.19), but it is not being implemented strongly enough in practice. Policy 2.18, on green infrastructure, commits the Mayor to protect, promote, expand and manage the quality and access to London's green infrastructure.[8] Policy 7.19, on biodiversity and access to nature, commits the Mayor to ensure a proactive approach to the enhancement, creation, promotion and management of biodiversity.[9]

1.5 Biodiversity is also considered in the Housing Supplementary Planning Guidance (SPG). Standard 40, of the Housing SPG, calls for the design and layout of new residential development to avoid areas of ecological value and seek to enhance the ecological capital of the area.[10] However, like the above London Plan policies, this standard is not being translated at ground level.

Biodiversity at the London Legacy Development Corporation (LLDC) and the Queen Elizabeth Olympic Park (QEOP)

The LLDC covers over 480 hectares, which includes the Queen Elizabeth Olympic Park (226 hectares), spanning three boroughs and is set to deliver 24,000 new homes. The LLDC is a Mayoral development corporation and, as such, has its own planning policies. These include policy BN.3: Maximising biodiversity, which requires development proposals to maximise opportunities to protect and enhance biodiversity, and also provide a net gain of habitat (more information can be found in Appendix 1).[11] The site also has its own sustainability guide, which commits that all new sites will incorporate Sustainable Urban Drainage Systems (SUDS) where possible, which enables species-rich planting, and buildings must be designed to reduce the urban heat island effect. It also commits that public realm design must contribute to biodiversity and link existing habitats.[12] Planning permission for the QEOP was also conditional on the production of a BAP.[13]

This long-term sustainable approach to urban development has green infrastructure at its heart. The use of green infrastructure complements local wildlife and improves social and economic prospects for people living, working and investing in the area. The LLDC is a positive example of how the Mayor can have a powerful impact on planning decisions. The policy of maximising biodiversity has been implemented with great success in the LLDC and developers have worked to the higher mandatory standards.

1.6 Although the London Plan policies call for enhancement and creation, the minimum requirement is protection of what already exists on site. The wording of the policies leaves developers room for manoeuvre and there is no pressure for them to include more than the minimum for biodiversity. Amending the wording of the London Plan to 'net gain', similar to that already in place in the LLDC policy, would ensure the London Plan delivered more than was present before development began. Although some developers are already doing much more than the minimum required, including more prescriptive wording in the London Plan will encourage other developers to improve their biodiversity offer within new housing developments.

> "There should be a requirement for housing developments to minimise impacts on biodiversity and to achieve positive net gains in biodiversity such as through improvement of existing habitat, creation of new habitat or through design features."[14]

Recommendation 1

The Mayor should amend the London Plan to include the wording 'net gain' similar to the LLDC policy, to ensure biodiversity is enhanced and created, not just protected.

1.7 Furthermore, the Mayor should ensure that in strategic development sites where he has a significant role, like the LLDC, he sets an exemplar standard for biodiversity provision to meet his goal of liveable neighbourhoods. The Mayor can lead the way through development corporations, opportunity areas, housing zones and other strategic planning applications. By setting the benchmark for biodiversity at these sites, the Mayor will encourage developers to increase levels of biodiversity provision in housing developments, and to include biodiversity from the beginning of the planning process. Including biodiversity in the masterplanning process should increase amounts and connectivity of habitat and ensure that adaptations are in line with the local vernacular. This will help the Mayor to achieve his manifesto goal of improving connections between habitats in the city, as well as increasing environmental resilience.[15]

> "Securing significant improvements rely on early identification of opportunities for enhancement, detailed pre-application discussion, and resource availability to meet with developers and provide advice."[16]

Recommendation 2

The Mayor should ensure biodiversity is integrated within the masterplanning process, ensuring a whole area approach is taken in opportunity areas, housing zones and development corporations that are deficient in biodiversity and green space, or areas which are suffering with environmental issues (e.g. flooding, urban heat island, air pollution).

1.8 The Mayor now has the opportunity to positively influence planning decisions at the Old Oak and Park Royal Development Corporation (OPDC). Although this site is not identical to the LLDC, best practice can be used from the LLDC and other sites in London. The Mayor can use the OPDC as a platform to promote the standard expected for developments in London and show how biodiversity can be increased while building at high densities.

Recommendation 3

The Mayor should showcase new learning at the OPDC, highlighting how sites can be built in high densities while still increasing the levels of biodiversity.

2. Green infrastructure and biodiversity

Key findings

- Green infrastructure could be used as a delivery vehicle for increasing biodiversity in new housing developments.
- Some European cities have successfully increased green infrastructure and nature in developments using a planning tool called a green space factor.
- Supplementary planning guidance is needed to bridge the gap between London Plan policies and implementation on the ground.

Green infrastructure as a delivery vehicle for biodiversity

2.1 Green infrastructure can be defined as a network of green spaces and features such as street trees and green roofs that is planned, designed and managed to provide a range of benefits.[17] Increasing green infrastructure within housing developments could link existing habitats, as well as create new ones, allowing biodiversity to thrive. Green infrastructure is being increasingly used in new developments and is included in the Mayor's Infrastructure Strategy 2050. Examples of biodiversity-friendly green infrastructure are green and brown roofs, water retention ponds and Sustainable Urban Drainage Systems. It is by creating such green spaces that fauna and flora can thrive in an urban, and at times hostile, environment.

The challenge of turning 180 hectares of brownfield site green

Barking Riverside is London's largest regeneration scheme, covering 180 hectares and is set to deliver 10,800 new homes. The site is part of a European research and development scheme called 'TURAS' (Transitioning towards Urban Resilience and Sustainability). This has brought together Barking Riverside Ltd, the London Borough of Barking and Dagenham, Livingroofs.org, and the University of East London Sustainability Research Institute to investigate how green infrastructure design can increase the sustainability and resilience of the development.[18]

The site contains rare and protected species. Consequently, its planning permission was conditional on the creation of a biodiverse green infrastructure strategy due to its vast scale to prevent the loss of biodiversity. This includes a requirement for 40 per cent of the site to be green space, a SUDS masterplan, a requirement for 40 per cent of properties to have green roofs, and sets out how the existing creek network will be incorporated into the overall design. Although this means that the site will be very green overall, where land is viable for development, construction will also be at much higher densities to meet the target of 10,800 new homes.

The success of this site remains to be seen as it is still under construction. However, the green infrastructure strategy has been successful in creating new habitats for protected species and is informing each stage of the development process. The partnership between the development and the TURAS project also means that, although the site is vast, many of the methods that are currently being tested can be used on other sites.

2.2 Green infrastructure also improves the environmental resilience of sites. Problems linked to cities such as high levels of pollution, flooding and the urban heat island effect can be reduced using this type of infrastructure. Green infrastructure can reduce air pollutants such as nitrogen dioxide by 15 per cent, particulate matter by 23 per cent and reduce the urban heat island

effect by one degree centigrade.[19] According to research by the Environment Agency, green infrastructure could provide benefits worth tens of millions of pounds a year, by reducing pressure on wastewater infrastructure, enabling sustainable transport and promoting economic growth.[20]

Water retention pond at Barking Riverside © Stuart Connop

Does London need a green space factor?

2.3 Prescribing a level of green infrastructure in new housing developments can successfully protect and create habitats. This can be done through a planning tool called a 'green factor' or 'green space factor' (GSF). This planning tool ensures a minimum level of greenery in a development and improves resilience to climate change.

2.4 The GSF gives weightings to different surfaces types depending on their permeability, with a score of 0 for sealed surfaces and 1.0 for full vegetation cover (see Appendix 2). The GSF is calculated by multiplying the factor assigned to the surface type by the area of the surface type, divided by the total area of the development (see Appendix 3). This figure must meet a specified target set out by the local planning authority in order to receive planning permission.

Case study 1: Biotope Area Factor, Berlin, Germany

Berlin was the first city to introduce a points-based planning requirement for biodiversity, known as the Biotope Area Factor (BAF) in 1994. The BAF was designed as a response to the problems of high temperatures, air pollution and water shortages arising from development and wider climate changes. The BAF was designed to mitigate the impacts of new development to meet objectives such as reducing the urban heat island effect, maintaining soil and water balance, maintaining quality plant and animal environments and improving the residential environment. The BAF applies to both new development and extensions and alterations.

The BAF requires that a certain proportion of the surface area of a development is devoted to greenery or green infrastructure. Specifically, this approach is modelled around biotopes, or specific habitats, for example shrubbery or grasses.

The BAF has been used widely across Berlin, including areas where adoption is only voluntary. A University of Manchester study argues that this is due to its relatively simple nature, as well as rising concern among developers and architects about environmental issues.[21] As such, developers and building owners tend to incorporate it where it is recommended. It has been argued that the BAF has secured habitats and protected species, as well as contributing to a reduction in the urban heat island effect. However, there has been no full evaluation of compliance or impact of the BAF.

2.5 However, a GSF alone does not fully address biodiversity provision, and is limited when valuing habitats. Concerns have been raised through this review that this planning tool is primarily focussed on improving permeability of surfaces, so would be an inappropriate tool to improve biodiversity.[22] However, although a GSF may not immediately benefit biodiversity, it would improve environmental resilience and provide social benefits in the short term, while nature becomes established. It can also be adapted to include measures to improve habitats, as seen in Berlin and Malmö where the GSF has been adapted to include measures to improve habitats to notable success. Evidence received to this review confirmed that the implementation of a GSF, or similar planning tool, would allow for the creation of new habitats, but also send a clear message to developers on what is expected.[23]

2.6 Implementing a London-wide GSF could increase green infrastructure in the city. However, to increase biodiversity it must be widely drafted as to what to should be included, similar to the BAF of Berlin and GSF of Malmö. This could include adaptations such as bird and bat bricks, bug hotels and hedgehog runs through a development.

Case study 2: Green Space Factor and Green Points System, Malmö, Sweden

In 2001 Malmö piloted a Green Space Factor (GSF) and Green Points System (GPS) in the development of 500 new homes in the district of Västra Hamnen (Westen Harbour), formerly an industrial area of the city. The GSF and GPS were introduced to ensure a minimum level of greenery in the development, but also to create a healthy environment for people; to promote biodiversity; and to minimise stormwater run-off throughout Malmö.

To ensure that the development also enhanced biodiversity, a GPS was implemented alongside the GSF. The GPS was originally a list of 35 points where developers were required to choose 10 to include in their plans (see Appendix 4). This included items such as bat boxes and areas of open water. This has now been developed further and is a now a list of biotopes, similar to Berlin's Biotope Area Factor, where at least one should be built.[24]

The GSF has now encompassed the GPS, its use has been very successful and it is seen as a powerful tool in the aim of creating a greener Malmö. The GSF has since been incorporated into the municipal Environmental Building Code and every new development must include a GSF if it is built on public land in the cities of Malmö and Lund. However, it is only mandatory in developments on public land so many developers are still potentially bypassing the need to improve green space and biodiversity.

Recommendation 4

The Mayor should consider the possibility of implementing a green space factor in London, similar to that in place in Berlin and Malmö, and pilot this scheme in opportunity areas, housing zones and developments of strategic importance.

Green infrastructure in the London Plan

2.7 Green infrastructure is already part of the London Plan and has an SPG relating to its implementation. It also features in the Infrastructure Strategy 2050. Minimum levels of green infrastructure can be implemented through planning conditions, as seen at Barking Riverside.

> "Green infrastructure and the ecosystem services it provides is the very bedrock of improving resilience for the future."[25]

2.8 The creation of the All London Green Grid (ALGG) SPG in 2012 is a good example of how to bridge the gap between policy and practice. This SPG supports the delivery and implementation of London Plan policies on green infrastructure. It includes information and guidance on how to deliver the ALGG in a local context and how to secure revenue funding. A review of the ALGG by Campaign to Protect Rural England and Neighbourhood Greens showed that the ALGG has had a positive impact on policy and formal recognition of the value of green space.[26] The review found that in 2014, just two years after publication, 50 per cent of boroughs had included the ALGG SPG in local policies.

2.9 The gap between policy and practice has also been bridged by the Sustainable Design and Construction SPG, which includes best practice examples, signposts to other groups and further information relevant to the policy, Mayoral priorities and key targets. Other examples include the Streets Toolkit by Transport for London and the London Sustainable Drainage Action Plan, which feature examples of best practice and guidance on likely implementation opportunities. The Streets Toolkit does this through case studies. These case studies contain different examples by size, and include information on the costs and lessons learned.

Bridging the gap between policy and practice

2.10 The evidence to this review indicates that similar guidance needs to be available to planners and developers to provide information on how to implement existing policy on the ground to increase biodiversity adaptations in developments. Evidence received for this review confirms that the creation of a single document, like the ALGG SPG, would provide greater clarity[27] and ensure there was strategic view of biodiversity across London.[28] Submissions described that a single piece of guidance would need to include appropriate language and examples in order to bridge the gap between the strategic vision of the London Plan and how to implement it on the ground.

2.11 This document should provide clarity to developers on what is expected in developments in London. It should also be flexible enough to ensure this does not impact the viability of developments. Much like the London Sustainable Drainage Action Plan, contributors describe a single document that would need to include the necessary technical guidance, information needed at pre-application stage, information on appropriate adaptations, and management costs and examples of best practice. This document would bring the London Plan policies relevant to biodiversity to life, while ensuring that Mayoral priorities would be delivered.

Recommendation 5

The Mayor needs to bridge the gap between the strategic vision of the London Plan and practice on the ground at borough level through the creation of a Biodiversity in Housing SPG

2.12 Any future SPG should be similar to the Sustainable Design and Construction SPG and London Sustainable Drainage Action Plan, showing how biodiversity can be integrated in other features that are a requirement (e.g. SUDs, air quality), and highlight where biodiversity friendly green infrastructure could be used instead of traditional 'grey' infrastructure.

3. Planning for nature

Key findings

- Local authority planning departments have lost biodiversity expertise in recent years, largely due to funding cuts.
- Identifying biodiversity early in the development cycle saves time and money in the long run.
- Including baseline ecological data with planning applications should prevent a detrimental effect on biodiversity in local authorities where the loss of biodiversity expertise is more acute.

Planning for nature at a local level

3.1 There is a lack of knowledge of biodiversity and a lack of capacity within, and between, local authority planning departments. Evidence gathered for this review has highlighted the decline in biodiversity expertise within local authorities. The loss of biodiversity expertise in planning departments is largely due to funding cuts.[29] Without the correct expertise, planning departments are unable to consider biodiversity to its full extent. This prevents planners promoting more than the minimum required to developers.

3.2 However, all local planning authorities must ensure all planning applications have a due regard for biodiversity and they have a legal obligation to consider priority species, even if they do not have any expertise in biodiversity. Planning departments have to rely on developers providing good quality information to accompany the planning application in order to make an informed decision. Without good quality information on what exists on site, the protection of biodiversity relies solely on the planner's local knowledge.

3.3 Evidence received for this review confirmed that the consideration of biodiversity varies between each local authority, and is not 'given the priority it should by planning authorities'.[30] The review found that biodiversity is only given attention where there is a 'trigger or known impact or if there is anything visible at the outset'.[31] Without ecological expertise, the assessment and enforcement of biodiversity will not be sufficiently addressed, even if a protected species is present. These issues can be partially attributed to the strain on local authority planning departments due to funding cuts.

> "Whilst biodiversity is a material consideration for planning decisions it is low on the agenda, and is rarely given equal consideration to other matters."[32]

3.4 If a site is deemed likely to have significant effects on the environment an Environmental Impact Assessment (EIA) is required with a planning application, although it is unclear when this is required for some projects.[33] Changes to EU legislation on EIAs in 2014 mean that any site requiring an EIA must also be monitored long-term. This will be implemented by regulation this year.[34]

Can data help to increase biodiversity?

3.5 It is good practice to attach a baseline monitoring report or ecological data search with all planning applications, small or large. Including this information should offset some of the loss of expertise and allow an informed decision to be made. This is beneficial for both the planner and the developer, as identifying biodiversity early in the development cycle saves time and money in the long run.

3.6 However, ecological data searches potentially only accompany around 1 per cent of planning applications in London.[35] Research published by the GLA showed that, in the four London boroughs studied, over 18 per cent of applications met the criteria for a biodiversity data search through Greenspace Information for Greater London (GiGL), the local environmental records centre, but only 1.2 per cent actually used them.[36] Thus, these planning permissions could have been granted without due consideration for the biodiversity that existed on site. However, these planning applications may have been accompanied by data from other sources, such as local environmental groups.

3.7 Including baseline data with a planning application should be standardised throughout London in order to prevent a detrimental effect on biodiversity in local authorities where the loss of expertise is more acute. This data could be used in partnership with a Biodiversity in Housing SPG and would allow planners to provide recommendations when they are responding to a planning application. A baseline data search could be used by developers to inform planning applications and development designs.

Recommendation 6

The Mayor should encourage planning departments to request a minimum baseline survey through Greenspace Information for Greater London (GiGL), or others, to accompany all planning applications in order for planning departments to make an informed decision.

3.8 Furthermore, it has been highlighted to this review that professional ecologist surveys are not passed to GiGL. Sharing this data with GiGL would ensure London's environmental records are as up to date as possible. Submitting baseline data and ecological surveys to GiGL would also ensure that any future monitoring would have an accurate baseline for comparison.

Recommendation 7

The Mayor should request that all developments share ecological data with Greenspace Information for Greater London (GiGL), after a development is completed. This would allow data gaps to be closed and effective monitoring through GiGL searches and updates.

Early identification and partnership working at Woodberry Down, London

This project is expected to deliver over 5,500 new homes, including 15 acres of landscaped open space. The regeneration is being completed through a public-private partnership between Berkeley Homes, London Borough of Hackney, Genesis Housing Association and the Woodberry Down Community Organisation. The partnership has engaged with the London Wildlife Trust (LWT) and Thames Water to develop Woodberry Wetlands, a new wildlife centre which opened in May 2016.

Early identification and a site-wide approach throughout the masterplan, meant biodiversity and green infrastructure were included and enhanced from the beginning of the project. The marketable qualities of the reservoir were also identified early on and a business plan was formed, which has been the key to the Wetlands success.

A baseline environmental survey informed the masterplan and planning application. The survey allowed recommendations to be made to enhance areas for wildlife throughout the development without compromising amenity value. The masterplan includes five new green spaces and landscaped walkways around the reservoir.

Building on the baseline survey that informed the masterplan, the developer commissioned a further ecological appraisal and partnered with the Green Roof Consultancy company to carry out significant enhancements for biodiversity. These enhancements allowed the development to receive the maximum credits under the CfSH category 'Change of Ecological Value of Site'.

These measures include long-term management by Berkeley Homes (of the estate) and London Wildlife Trust (of the Wetlands).

Recommendation 8

The Mayor should provide resources (start-up funding/seed capital) to the 'Partnership for Biodiversity in Planning', which is working to simplify, streamline and improve the consideration of biodiversity in the planning process.

3.9 The Partnership for Biodiversity in Planning is a collaboration between 19 organisations including the Royal Town Planners Institution, Greenspace Information for Greater London and the Home Builders Federation. This collaboration will deliver targeted, industry-led solutions. The outputs will include an innovative web-based planning tool that will enable users to undertake a simple check of whether a potential development requires an ecological assessment and a web portal that will provide a 'one stop shop' for guidance relating to protected species in the planning process. [37] This tool can be used by planners and developers.

4. Enhancing and creating, not just protecting

Key findings

- The focus on protected species by local authorities is potentially preventing developers doing anything more than protection of what is already on site.
- Perceptions that including biodiversity adaptations is costly and complicated mean that some developers avoid biodiversity completely.
- Some developers have seen the value of including biodiversity from the very beginning of a development.

Biodiversity is perceived as an 'added extra'

4.1 Developers focus primarily on protecting species that are already on a site, especially if they are a protected species and feature in a local authority BAP, instead of how biodiversity might be enhanced. The focus of local planning policies on protected species has prevented discussions about enhancing and creating biodiversity in developments.

4.2 The emphasis on protected species has shaped perceptions for developers that biodiversity is costly, time consuming and bad for business. Consequently some developers avoid biodiversity as much as possible, and only do the bare minimum to receive planning approval. Any commitments to enhance or create biodiversity above the minimum on a site are often reduced over a development life cycle, due to financial and time pressures.[38]

4.3 Evidence from the review highlighted that some developers do not view biodiversity as an integral part of a development, and think biodiversity would detrimentally affect the viability of sites.[39] Other barriers to including biodiversity on sites include the belief that biodiversity has no or very limited value.[40] The perception of biodiversity as an 'added extra' causes developers to view it as a costly inconvenience, rather than something that can add value to a development. These perceptions stop developers from including biodiversity provision in developments above the minimum requirements.

> "[Biodiversity] is often given lower priority by clients and contractors – seen as a 'nice to have' rather than a 'need to have'. The focus is more on the delivery of units and tenure mix rather than enhancing existing biodiversity."[41]

Not knowing the cost is holding developers back

4.4 The cost of long-term management is also a major barrier to including biodiversity adaptations in developments. Perceptions that adaptations would be expensive to maintain and require expert contractors makes developers reluctant to include biodiversity adaptations in sites. However, the type and cost of long-term management depends on the adaptations used, for example, a brown roof requires yearly maintenance but a green roof requires more frequent maintenance.[42] The cost of management will also depend on the type of planting used. It can be expensive if the wrong planting is used, for example, a plant that requires a large amount of water is more costly. Knowing the long-term management cost of a biodiversity adaptation would allow developers to quantify it and cost it in from the beginning, like any other management facility.

An alternative method of long-term management

The Land Trust is an organisation set up to provide long-term management of green spaces in and around housing developments, undertaking more than just grass cutting regimes. The Land Trust has developed a unique financial model to provide funding solutions for developers to ensure green space is well maintained in the long-term through a service charge model, where residents within all new houses contribute to the annual costs of maintaining the green spaces. This funding also contributes towards the cost of a Community Ranger who generates community involvement, volunteering opportunities, organised events and activities. This helps to improve the health and wellbeing of residents while providing educational opportunities and involving them in maintaining the habitats, which also support biodiversity.

This model enables the developer to incorporate green spaces within a development without the worry of dealing with these spaces, and without added costs. This solution is cost-effective and enables developers to create sustainable places and homes, building communities where people want to live, work and play, rather than simply building houses.[43]

4.5 Temporary structures, or 'meanwhile uses', are an option that can create habitat and enhance biodiversity in a development without creating long-term management costs. 'Meanwhile uses' can improve the visual aspects of a site, for example, reusable green hoardings. They can also allow access to a site which would otherwise be vacant, for example temporary allotments. Promoting biodiversity during the construction process can also increase community cohesion after the development is finished.

4.6 Perceptions that biodiversity is complicated, time consuming and costly (to implement and to manage long-term), are recognised as being a problem by the environmental community. There are many different guidelines from charities, NGOs and conservation groups on how to incorporate biodiversity in new developments. For example, Buglife has produced a guide for biodiversity on brownfield land[44] and the Bat Conservation Trust has published a technical guide on designing for biodiversity.[45] These guides provide information on the importance of biodiversity and how it can be included within a development, normally at little cost. Although this is a positive step, it means it is easy for developers to ignore as there is not one clear requirement.

Meanwhile uses at Battersea Power Station, London

The site at Battersea Power Station covers 42 acres, and is set to deliver 3,400 new homes through eight phases. The former industrial site had minimal biodiversity value; however, there are two protected species on site – the peregrine falcon and the black redstart.

The peregrine falcons have been temporarily rehoused on site as they were nesting inside a power station wash tower. When work on phase two (the power station itself) completes the falcons will be rehoused back in the power station in a nest box. The design accommodates the rehousing of the falcons and ensures it can be cleaned – there is a hatch that is accessible from the interior. As the site develops it will include brown roofs to replace the black redstart's habitat lost through development.

A temporary park was developed on site during early stages of the development and included trees and wildflowers. When the land was needed for development they were able to relocate 40 trees on the site but came across many barriers for other trees they could not relocate.

The developer also uses their own type of green space factor, which includes different options for both temporary and permanent measures, such as planting on the building site, green hoardings and green scaffolding. This 'shopping list' includes price and maintenance information and how it will be included in the service charge for those items that will be maintained on site after the development is complete.

4.7 A lack of understanding of the value of biodiversity is also preventing developers including biodiversity adaptations and biodiversity friendly green infrastructure in developments. Including landscape and green infrastructure in a site can ensure planning permission is granted with fewer conditions.[46] A local government review into new housing developments found that 82 per cent of councillors in England and Wales identified green spaces as one of the factors that would make new developments more acceptable.[47]

> "The more significant features... have a very positive and tangible impact on desirability and as such, demand for properties and sales values"[48]

4.8 Developers who contributed to this review confirmed that biodiversity friendly green infrastructure positively affects economic aspects of developments and improves the attractiveness of a development.[49] Developers who gave evidence to this review also highlighted that investing in biodiversity and landscape in a development creates a unique selling point. Competitions such as the BIG Biodiversity Challenge raise awareness of biodiversity in developments, but also increase competitiveness between developers. This should increase the amount of biodiversity adaptations included in housing developments.

Recommendation 9

To raise awareness of the importance of biodiversity in housing, the Mayor should sponsor an award category for biodiversity adaptations in housing developments through the BIG Biodiversity Challenge.

Challenging perceptions of biodiversity

4.9 Perceptions around biodiversity are holding developers back. The clear promotion of best practice, including resources and long-term management, would banish feelings of uncertainty and help developers understand the value of biodiversity and how their developments could include measures to protect, enhance and create biodiversity. Providing guidance in line with the London Plan would challenge perceptions that biodiversity is an inconvenient cost. Using best practice examples, information on various temporary and permanent measures, different management structures and up-front and long-term costings will show developers, and others, that biodiversity is, in fact, something to value.

4.10 This review has found that there are several key factors that should make it easier for biodiversity adaptations to be included in developments:

- **Early identification** – this enables the design of the development to incorporate any changes for species and habitat found on the site. Retrospective ecological surveys can slow down planning applications and cost money.
- **Early inclusion** – this enables biodiversity adaptations to be included from the start of the development and can be costed into the site. Adapting plans later on in the development cycle can cost time and money.
- **Green instead of grey infrastructure** – using green infrastructure in the development allows mandatory requirements, for example, drainage to be biodiversity friendly. Green infrastructure can act as the golden thread throughout the development, encouraging biodiversity, saving money long-term and making the development more resilient to climate change.
- **Partnership working** – this allows knowledge to be shared and can be an external partnership between organisations or a partnership between internal teams.
- **Community engagement** – engaging with the community throughout the development process increases levels of acceptance of the development and allows local views to shape the development. Engaging local people early on empowers them to become everyday monitors of the site.

Recommendation 10

The Mayor should commission a source of best practice guidance, which includes different options for temporary and permanent measures, price and maintenance information and how these measures could be included in the service charge, for those items that will be maintained on site after the development is complete.

The Mayor has the power to set the bar for a net gain in biodiversity as a minimum, and not just protection of what existed before development began. By adopting our recommendations the Mayor can send a powerful signal that the push to achieve record levels of housebuilding can be achieved at the same time as boosting local wildlife.

Appendix 1

LLDC Policy BN.3: Maximising biodiversity

Policy BN.3: Maximising biodiversity

The Legacy Corporation will work with its partners to ensure the protection and enhancement of biodiversity within open space, parks and built-up neighbourhoods.

Development proposals will be required to:
1. Maximise opportunities to protect and enhance biodiversity
2. Provide a net gain in the extent of habitat suitable for species to thrive
3. Integrate habitat and other measures that will support biodiversity
4. Ensure measures are taken to conserve and promote Sites of Importance for Nature Conservation where relevant
5. Retain trees and contribute to tree-planting
6. Take account of habitat and species targets in relevant Biodiversity Action Plans (BAPs) to ensure proposals are suitable for their location
7. Support other measures to address BAP objectives, including monitoring
8. Ensure major applications are accompanied by a Biodiversity Statement

Development proposals that are likely to have an adverse effect on biodiversity and the existing extent of habitat will not be permitted unless compensatory provision of equal value is provided in a suitable location and that loss does not result in the breakage of any existing habitat or wildlife corridor.

Cross-reference to policies: BN.7; S.4; S.7, London Plan policies: 7.19; 7.21

Appendix 2

The Biotope Area Factor weighting scores

Weighting factor / per m² of surface type	Surface type	Description of surface type
0.0	Sealed surfaces	Surface is impermeable to air and water and has no plant growth (e.g. concrete, asphalt, slabs with a solid subbase)
0.3	Partially sealed surfaces	Surface is permeable to water and air; as a rule, no plant growth (e.g. clinker brick, mosaic paving, slabs with a sand or gravel subbase)
0.5	Semi-open surfaces	Surface is permeable to water and air; infiltration; plant growth (e.g. gravel with grass coverage, wood-block paving, honeycomb brick with grass)
0.7	Surfaces with vegetation, unconnected to soil below	Surfaces with vegetation on cellar covers or underground garages with less than 80 cm of soil covering
1.0	Surfaces with vegetation, connected to soil below	Vegetation connected to soil below, available for development of flora and fauna
0.2	Rainwater infiltration per m² of roof area	Rainwater infiltration for replenishment of groundwater; infiltration over surfaces with existing vegetation
0.5	Vertical greenery up to a maximum of 10 m in height	Greenery covering walls and outer walls with no windows; the actual height, up to 10 m, is taken into account
0.7	Greenery on rooftop	Extensive and intensive coverage of rooftop with greenery

Appendix 3

Green Space Factor calculation

$$GSF = \frac{(\text{area A} \times \text{factor A}) + (\text{area B} \times \text{factor B}) + (\text{area C} \times \text{factor C}) + \text{etc.})}{\text{Total courtyard area}}$$

Appendix 4

Malmö Green Points System[50]

1. A bird box for every apartment
2. A biotope for specified insects in the courtyard (water striders and other aquatic insects in the pond)
3. Bat boxes in the courtyard
4. No surfaces in the courtyard are sealed, and all surfaces are permeable to water
5. All non-paved surfaces within the courtyard have sufficient soil depth and quality for growing vegetables
6. The courtyard includes a rustic garden with different sections
7. All walls, where possible, are covered with climbing plants
8. There is 1 square metre of pond area for every 5 square metres of hard-surface in the courtyard
9. The vegetation in the courtyard is selected to be nectar rich and provide a variety of food for butterflies (a so-called 'butterfly restaurant')
10. No more than five trees or shrubs of the same species
11. The biotopes within the courtyard are all designed to be moist
12. The biotopes within the courtyard are all designed to be dry
13. The biotopes within the courtyard are all designed to be semi-natural
14. All storm water flows for at least 10 metres on the surface of the ground before it is diverted into pipes
15. The courtyard is green, but there are no mown lawns
16. All rainwater from buildings and hard surfaces in the courtyard is collected and used for irrigation
17. All plants have some household use
18. There are frog habitats within the courtyard as well as space for frogs to hibernate
19. In the courtyard, there is at least 5 square metres of conservatory or greenhouse for each apartment
20. There is food for birds throughout the year within the courtyard
21. There are at least two different old-crop varieties of fruits and berries for every 100 square metres of courtyard
22. The facades of the buildings have swallow nesting facilities
23. The whole courtyard is used for the cultivation of vegetables, fruits and berries
24. The developers liaise with ecological experts
25. Greywater is treated in the courtyard and re-used

26. All biodegradable household and garden waste is composted
27. Only recycled construction materials are used in the courtyard
28. Each apartment has at least 2 square metres of built-in growing plots or flower boxes on the balcony
29. At least half the courtyard area consists of water
30. The courtyard has a certain colour (and texture) as the theme
31. All the trees and bushes in the courtyard bear fruit and berries
32. The courtyard has trimmed and shaped plants as its theme
33. A section of the courtyard is left for natural succession (that is, to naturally grow and regenerate)
34. There should be at least 50 flowering Swedish wild herbs within the courtyard
35. All the buildings have green roofs

Our approach

The Greater London Authority Act 1999 gives the Assembly the power to investigate and prepare reports on matters of importance to London. The Act also enables the Assembly to arrange for any of its functions to be undertaken on its behalf by a Committee or by a single Assembly Member. A 'rapporteur review' is the term used to describe when this function is undertaken by a single Member of the Assembly.

The Housing Committee agreed the following terms of reference for this rapporteurship:

- Explore the extent to which housing developments during the last 10 years have incorporated biodiversity provision, with special consideration for sites of 150 units or more
- Assess the strengths and weaknesses of current guidance as set out in the London Plan and other Mayoral documents in promoting and enhancing biodiversity in new housing developments
- Review best practice from other UK and foreign cities including Malmö, Berlin, Hamburg and Seattle
- Make recommendations to the Mayor, establishing ways to effectively promote and enhance biodiversity, in line with the local vernacular, and without affecting the viability of new housing developments

At its roundtable evidence sessions, the rapporteur took oral evidence from the following guests:

- Anita Konrad, Director of Strategic Partnerships & Programmes, Groundwork London
- Anita Mitchell, Head of Sustainability - Europe, Lendlease
- Bevan Jones, Managing Director, Sustainable Homes
- Caroline Nash, Research Assistant, Sustainability Research Institute, University of East London
- Dr Carol Williams, Director of Conservation, Bat Conservation Trust
- Dr Stuart Connop, Senior Research Fellow, Sustainability Research Institute, University of East London
- Henry Johnson, Hedgehog Officer, People's Trust for Endangered Species
- John Day, Urban Conservation Adviser, Royal Society for Protection of Birds

- Juliette Young, Senior Policy Officer, Royal Society for the Protection of Birds
- Laura Boccadamo, Sustainability Advisor, Berkeley Group
- Mathew Frith, Director of Conservation, London Wildlife Trust
- Matt Shardlow, Chief Executive, Buglife
- Olivia Allen, Sustainability Advisor, Berkeley Group
- Pete Halsall, Director, East Kent Sustainable Homes

During the investigation, the rapporteur also received written submissions from the following organisations:

- Arup
- Barratt PLC
- Campaign to Protect Rural England
- Dan McCurry, individual submission
- David Warburton, individual submission
- Froglife
- GiGL
- Hilson Moran
- Land Securities
- Land Use Consultants
- Landscape Institute
- London Borough of Bexley
- London Borough of Hammersmith and Fulham
- London Borough of Southwark
- London Forum
- London River Restoration Trust
- London Wildlife Trust
- Mark Hunter, London Borough of Wandsworth
- Mount Anvil
- People's Trust for Endangered Species
- Royal Botanical Gardens – Kew
- Royal Society for the Protection of Birds
- St Ann's Redevelopment Trust
- Sustainable Homes
- The Environment Agency
- The Land Trust
- The Woodland Trust
- University of East London, Sustainability Research Institute
- Valerie Selby, London Borough of Wandsworth
- Wildlife and Wetlands Trust
- Woolwich and District Antiquarian Society

References

[1] RSPB, 2016, The State of Nature

[2] Written evidence from the People's Trust for Endangered Species

[3] GLA, 2016, Mayoral planning powers

[4] DEFRA, 2011, Biodiversity 2020

[5] Department for Communities and Local Government, 2012, National Planning Policy Framework

[6] Natural Environment and Rural Communities Act 2006

[7] Letter to the Mayor – Environment Committee 2015

[8] London Plan Policy 2.18 – Green Infrastructure

[9] London Plan Policy 7.19 – Biodiversity and access to nature

[10] Housing SPG, Standard 40

[11] LLDC Local Plan 2015 - 2031

[12] Your sustainability guide to Queen Elizabeth Olympic Park

[13] Legacy Communities Scheme Biodiversity Action Plan 2014-2019

[14] Written evidence from the RSPB

[15] Sadiq Khan, A Greener, Cleaner London

[16] Written evidence from the Environment Agency

[17] GLA, Green Infrastructure

[18] Barking Riverside: TURAS showcase of sustainable and resilient community design

[19] Green Capital: Green Infrastructure for a future city

[20] London's Environmental Infrastructure Needs: A Strategic Study

[21] Adaptation to climate change using green and blue infrastructure: A database of case studies

[22] Oral evidence from the Bat Conservation Trust

[23] Written evidence from ARUP, Sustainable Homes, and Land Use Consultants

[24] The Green Space Factor and the Green Points System

[25] Written evidence from the Campaign to Protect Rural England

[26] CPRE, 2014, All London Green Grid Review

[27] Written evidence from Froglife; Hilson Moran; London Borough of Southwark; The Land Trust; UEL; The Woodland Trust; Wildlife and Wetlands Trust; GiGL; Land Use Consultants; Mount Anvil; and London Wildlife Trust

[28] Written evidence from the Bat Conservation Trust; London Borough of Bexley; The Land Trust; RSPB; London River Restoration Group; UEL; and Mount Anvil

[29] Association of Local Government Ecologists – Implications of the Comprehensive Spending Review on biodiversity work within local government

[30] Written evidence from Froglife

[31] Written evidence from Land securities

[32] Written evidence from the London Wildlife Trust

[33] Written evidence from Mark Hunter, London Borough of Wandsworth

[34] Eversheds, 2014, New EU Directive on Environmental Impact Assessment

[35] GLA, 2016, Biodiversity and Planning

[36] GLA, 2016, Biodiversity and Planning

[37] Biodiversity in Planning Partnership

[38] Written evidence from Mark Hunter, London Borough of Wandsworth; Arup; and CPRE

[39] Written evidence from Arup; Froglife; The Land Trust; UEL; Sustainable Homes; London Forum of Amenity; Mount Anvil; and Mark Hunter London Borough of Wandsworth

[40] Written evidence from Mark Hunter, London Borough of Wandsworth; GiGL; and London River Restoration Group

[41] Oral evidence from the Sustainable Homes

[42] Written evidence from Valerie Selby, London Borough of Wandsworth

[43] Written evidence from The Land Trust

[44] Planning for Brownfield Biodiversity A Best Practice Guide

[45] Designing for Biodiversity: a technical guide for new and existing buildings

[46] UK Green Building Council, 2015, Demystifying Green Infrastructure

[47] Local Government Association, 2010, New Housing Developments Survey

[48] Written evidence from Barratt PLC

[49] Written evidence from Barratt PLC; Land Securities; Arup; London Borough of Southwark; The Land Trust; UEL; The Woodland Trust; and Mount Anvil

[50] Annika Kruuse, 2011, GRaBS Expert Paper 6:The Green Space Factor and the Green Points System

Other formats and languages

If you, or someone you know, needs a copy of this report in large print or braille, or a copy of the summary and main findings in another language, then please call us on: 020 7983 4100 or email: assembly.translations@london.gov.uk.

Chinese

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Hindi

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Arabic

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Gujarati

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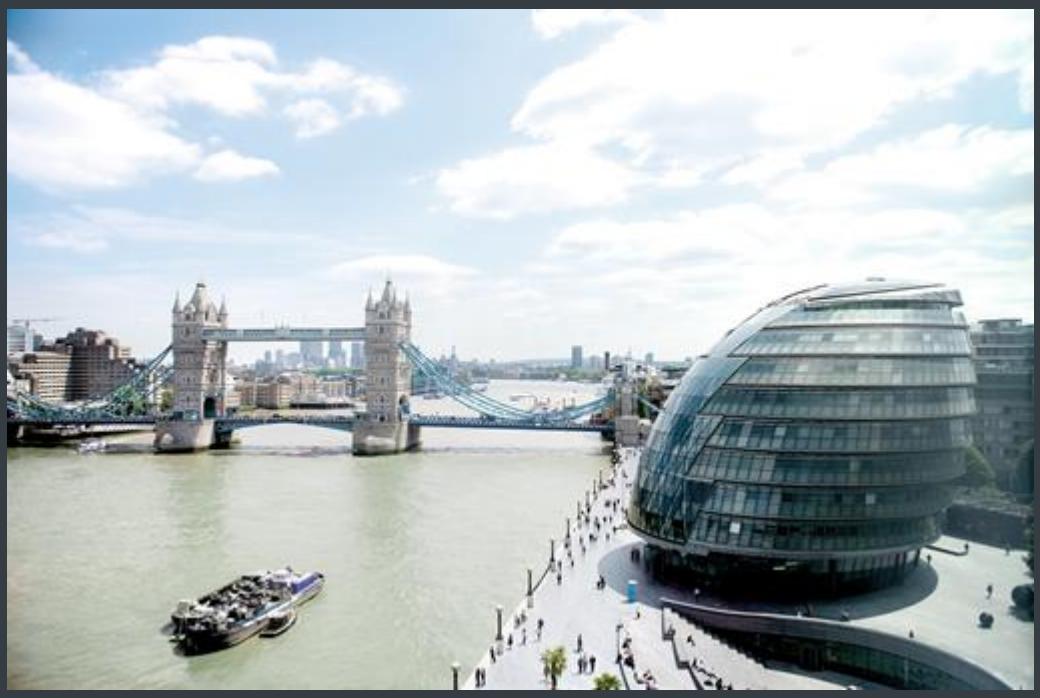

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