

MAYOR OF LONDON

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Thank you for your letter of 26 January detailing the findings of your rapporteurship on behalf of the Housing Committee about encouraging biodiversity in new housing developments.

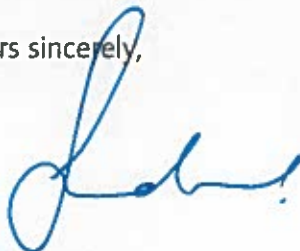
I agree it is essential that we maintain London's status as a green city whilst we also tackle London's housing shortage and address other infrastructure needs.

Your report is a very helpful contribution to the discussion about how we build more housing in London, whilst also enhancing the natural environment.

In my manifesto I made a commitment to make London a National Park City; and also to protect biodiversity by creating wildlife corridors across the city. Good quality new housing development that is designed with these principles in mind can make an important contribution to my ambition to make London a greener, healthier and fairer city.

I have responded to all of your report's recommendations in the appendix to this letter. I hope you will be encouraged by our broad agreement on this issue and I look forward to working with you and other members of the Housing Committee to help create more liveable neighbourhoods for both people and wildlife.

Yours sincerely,



Sadiq Khan
Mayor of London

Cc: Shirley Rodrigues, Deputy Mayor for Environment and Energy
James Murray, Deputy Mayor for Housing and Residential Development

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Appendix

Response to the recommendations in *At home with nature: Encouraging biodiversity in new housing developments*

Recommendation 1

The London Plan should be amended to include the wording net gain – similar to the LLDC policy which delivered the Olympic Park – to ensure biodiversity is enhanced and created, not just protected

We are working to ensure London Plan policy reflects your recommendation to include reference to net gain in line with guidance in the National Planning Policy Framework.

Recommendation 2

The Mayor should ensure that biodiversity is integrated within Masterplanning processes, ensuring a whole area approach is taken in Opportunity Areas, Housing Zones and Development Corporations that are often deficient in biodiversity and green space, or areas which are suffering from environmental issues (e.g. flooding, urban heat island effect, air pollution).

London Plan policies on green infrastructure already encourage a more strategic approach to the provision of green space in new development that provides broader benefits, and which connects and contributes to the wider green infrastructure network of the All London Green Grid. New policy frameworks and initiatives such as Integrated Water Management Strategies (which are currently being produced for OPDC and the Charlton to Bexley and Old Kent Road Opportunity Areas) and Transport for London's Healthy Streets initiative will enable a more holistic approach to be taken to addressing a range of environmental issues whilst also creating opportunities for enhancing biodiversity. We aim to strengthen this approach by ensuring better integration between policies and proposals in both the London Plan and London Environment Strategy.

Recommendation 3

New learning should be showcased at the OPDC, highlighting how sites can be built in high densities while still increasing the levels of biodiversity.

The OPDC are currently preparing their Local Plan policies and accompanying strategies. The emerging framework includes draft policies and proposals that will require and encourage new thinking and new approaches to protecting and creating green infrastructure within the context of denser development.

Recommendation 4

The Mayor should consider the possibility of implementing a green space factor in London, similar to that in place in Berlin and Malmo, and pilot this in Opportunity Areas, Housing Zones and developments of strategic importance, to demonstrate direction of travel, prior to fully incorporating this methodology in the London Plan.

Research on a green space factor is currently being undertaken to assess the suitability of this approach for London. If the research indicates that a green space factor would be a helpful policy instrument, a suitable policy will be included in the forthcoming London Plan. The

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research is exploring at what level of planning and scale of development a green space factor could best be applied; this will help determine where it would be best to pilot the approach.

Recommendation 5

To bridge the gap between the strategic vision of the London Plan and practice on the ground at borough level, the creation of a Biodiversity and Housing SPG should be considered.

There is certainly a need to provide better, up-to-date guidance to ensure that planners and developers are aware of the most effective ways of encouraging biodiversity in new housing developments. SPGs are a helpful way of providing more detailed guidance about the intent of strategic policy and there are already SPGs on the All London Green Grid SPG and Sustainable Design and Construction that sign-post how planners and developers can deliver better green infrastructure. However, as SPGs are static documents and detailed information about specific techniques and approaches can therefore become outdated quite quickly, another SPG may not be the most effective way of sign-posting the specific information needed to encourage biodiversity in new housing developments. Consequently, the forthcoming London Environment Strategy will be proposing working with wildlife charities and developers to produce relevant guidance and information.

Recommendation 6

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

Existing London Plan policy already indicates that appropriate baseline surveys should accompany planning applications that might have an adverse impact on biodiversity. The majority of the 88,000 planning applications made in London each year are unlikely to have an impact on biodiversity as they are for relatively minor developments. However, recent research undertaken by the GLA indicates that around 18% of planning applications should probably be supported by a biodiversity data search but far fewer actually commission such data searches¹. We are planning to include proposals, in my forthcoming London Environment Strategy, to work with London boroughs to raise awareness of this issue; and to provide guidance on which development proposals should be accompanied by more detailed ecological information to inform the planning decision.

Recommendation 7

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

Unfortunately, the data gathered by ecological consultants when preparing planning applications is owned by their clients. Many developers now share this data with environmental

¹ Planning for Biodiversity? Are development proposals being informed by appropriate data on species and habitats?

https://www.london.gov.uk/sites/default/files/biodiversity_and_planning_research_report_0.pdf

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records centres, such as Green Space Information for Greater London (GiGL), but there is no obligation to do so. I will continue to support the work of GiGL and encourage all those who own or possess data that is helpful to inform sound policy decision-making, to share data. The London Plan team will explore the possibility of including an advisory note on planning responses, which requests that relevant data is supplied to GiGL.

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.

The core work of the 'Partnership for Biodiversity and Planning' is already funded by the Esmée Fairburn Trust. The funding will allow the Partnership to develop tools and a web-portal to provide up-to-date guidance relating to protected species in the planning process. Once these have been developed, GLA officers will explore whether there is further support or resources required to help make this of particular relevance and utility for planners and developers in London.

Recommendation 9

To raise awareness of the importance of biodiversity in housing, the Mayor should sponsor an aware category for 'Biodiversity Adaptations in Housing Developments' through the BIG Biodiversity Challenge.

The BIG Biodiversity Challenge is a national award scheme and does not have sub-regional categories. Housing developments that have addressed biodiversity are included under the existing award categories. Working with other stakeholders, we will consider options for increasing the profile of biodiversity in housing through appropriate promotion of best practice.

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 the measures could be included in the service charge, for those items that will be maintained on site after a development is complete.

Please see my response to Recommendation 5.