

Promoting Biodiversity in New Housing Developments.

The Mayor is committed to a substantial building effort to increase the number of homes for Londoners.¹ This must be done while simultaneously protecting and enhancing the biodiversity of London. The London Plan and additional Supplementary Planning Guidance (SPG) offer strategies for protecting biodiversity and enhancing green infrastructure (the network of all green and open spaces). However, there is concern that current guidance focuses on protecting existing green spaces and biodiversity but does not properly promote mechanisms to create and increase functional landscapes and wildlife habitats.

How does Mayoral planning guidance for new developments protect biodiversity?

The current London Plan provides guidance on green infrastructure and biodiversity in several areas, encompassing green space, trees and waterways. Policy 2.18 commits that:

The Mayor will work with all relevant strategic partners to protect, promote, expand and manage the extent and quality of, and access to, London's network of green infrastructure.²

The policy recommends that development proposals, wherever possible, make a 'positive contribution to the protection, enhancement, creation and management' of biodiversity. It also stipulates that they should assist in achieving targets in Biodiversity Action Plans (BAPs).

Policy 7.19 provides further guidance on the Mayor's commitment to "ensure a proactive approach to the protection, enhancement, creation, promotion and management of biodiversity."³

Furthermore policy 7.21 seeks to protect and enhance trees and woodlands. Existing trees of value must be retained and any loss as the result of development should be replaced (following the principle of 'right place, right tree'). In addition the planting of additional trees should be included in new developments, particularly large-canopied species. Policy 5.10 contributes advice on urban greening and 5.11 on green roofs.

The Mayor's biodiversity strategy 2002 provides the context for London Plan policies and guidance, offering broad support for biodiversity in "proposal 5" and "proposal 6" which call for all planning decision to "take account of the protection of wildlife habitats and biodiversity". However, there is a strong case for the strategy to be reviewed and refreshed (the GLA has only just updated it) to reflect the changed national planning framework (and in particular, the Government's Natural Environment White paper 2011). In addition, this would provide the opportunity to more imaginatively and ambitiously examine mechanisms to create and increase functional landscapes and wildlife habitats in conjunction with new housing developments.

The GLA proposes to review the 2002 biodiversity strategy, along with the other Mayoral environment strategies and incorporate them into a new single London Environment Strategy. We propose that this rapporteurship could usefully feed into the biodiversity aspects of this project.

¹ Sadiq Khan, Housing Manifesto, May 2016

² London Plan Policy 2.18

³ London Plan Policy 7.19

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At present, wildlife charities such as the Bat Conservation Trust, associations such as the London Beekeepers Association, tree experts such as the Woodland Trust or Forestry Commission and planting experts such as the Royal Horticultural Society all provide their own suggested guidelines for specific species and habitats. But these carry no statutory force and developers may be unclear which set of guidelines may be most appropriate to adopt.

Aim of the review

This review will draw on the work done by the Green Infrastructure Task Force to identify how to encourage a more strategic and long-term approach to green infrastructure delivery and investment.

A wide call for evidence and a set of roundtable discussions will develop an evidence base to assess the strengths and weaknesses of the current guidelines and establish whether a single set of guidelines is feasible and how it would better protect and enhance biodiversity in new housing developments.

The rapporteurship will review whether creating a single set of guidelines applying to all forms of flora and fauna would enable a single directive for building developments to adhere to, enhancing London's biodiversity including assisting with air pollution mitigation. This would allow developers and planners to rely on one source for their information; reducing conflicting messages and creating a more cohesive and inclusive approach.

There are examples from cities such as Berlin, Malmo and Seattle that use the principle of “the green space factor”⁴ which may be of value in helping planners and developers to determine the extent of offsetting measures. The rapporteur will review the evidence of how such initiatives are working and consider the features and benefits of green infrastructure offset schemes and green space ‘factor’ schemes which (respectively) allow for construction to be offset with long-term green infrastructure benefits and hold new developments to a ‘minimum standard’ of green space delivery.

There is a shift towards planning, designing and managing green infrastructure as a holistic network. The rapporteurship will consider this line of thought and how it might be aided by a more joined-up approach to planning guidance.

In addition, there is significant potential for well-managed green infrastructure to deliver environmental and social benefit. Some argue that the current London Plan focuses too heavily on the preservation of existing green infrastructure. This is an opportunity to review whether environmental and social gains could be increased by boosting the London Plan’s focus on creating new green infrastructure.

Finally, different types of site will host different biodiversity. The biodiversity in a brownfield site will be different to that of a meadow, and it is exactly this variance that holds value and should be protected by the London Plan and other guidance. To that end, these differences will be taken into consideration when making recommendations for Mayoral policy.

⁴ Where a calculation is carried out on the environmental impact of any given land use proposal and then that same sum is used to determine the extent of offsetting measures that are required in the development (such as green walls)

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Proposed terms of reference

- 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; and
 - 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.
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Impact

Category	Evidence of impact
Challenging	<p>Exploring how planners and developers could do more to enhance and protect biodiversity in new housing developments.</p> <p>Highlighting any areas of the London Plan that do not provide adequate direction for BAPs and developers.</p>
Influencing	<p>Helping the Mayor to develop a strategy for improving biodiversity protection and green infrastructure enhancement guidelines and advice as part of the proposed London Plan review.</p> <p>Encouraging local authorities to consider the guidelines in the London Plan when developing Local Development Frameworks (LDFs).</p>
Engaging	<p>Involving a wide range of stakeholders, via written evidence collection and through a series of meetings, in order to collect a rich and diverse pool of opinion and evidence.</p>

Methodology

This investigation will use a combination of desk-based research, a review of Mayoral planning decisions and meetings with external partners to inform a final report to the Mayor.

- Identify and analyse a selection of Mayoral planning decisions to illustrate both good and poor practice examples of biodiversity protection;
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- Identify and analyse a selection of developments to build an understanding of how often and to what extent planning decision rulings on biodiversity are realised.
- The benefits of biodiversity can be hard to evidence. To mitigate this we will carry out a literature review of biodiversity best practice. We will consider, amongst other things, evidence and research to understand the social benefits of biodiversity, for example happiness and wellness indexes;
- A call for evidence will be undertaken to invite written contributions from key stakeholders such as wildlife charities, academic experts, local neighbourhood planning forums, housing associations and providers, developers and other professional bodies such as the Environment Agency;
- A set of informal discussions will be convened by the rapporteur. These will look to engage different stakeholder sectors in informal discussions on how to develop London's strategy for green infrastructure enhancement and biodiversity protection; and
- A literature review of best practice examples from UK and foreign cities will be undertaken to discover successful existing strategies for green infrastructure enhancement and biodiversity protection.

Timeline

July – August	Background research and analysis
September - October	Informal meeting series
October - November	Evidence collation and output drafting
November – January	Production of report

Risks and mitigation

Failure to engage key stakeholders such as developers and boroughs.

Mitigation: Offering to meet informally to discuss their experiences and emphasising the opportunity to simplify strategies for protecting biodiversity and enhancing green infrastructure by coordinating across GLA advice and that of other charities and organisations.

Examples from foreign cities are not appropriate given different planning and governance structures.

Mitigation: Understanding of importance of contextualising London's efforts and progress against that of other cities, while appreciating that these comparisons cannot always be accurately drawn. Comparisons made will be qualified with explanations of any differing circumstances.

External partners do not provide convincing evidence.

Mitigation: Should engage with a broad variety of external stakeholders in order to build as rich and diverse an evidence base as possible. Some stakeholders will be more relevant or experienced than others; these

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should be prioritised in terms of timings and addressed with specific, focused questions. Opportunities to gain first-hand evidence should be identified and made use of wherever possible.

We have a tight resource for the Housing Committee that risks additional strain.

Mitigation: Planning the investigation thoroughly at an early stage will allow the team to identify and allocate the correct level of resource and reduce the potential for this rapporteurship to divert resource away from the Housing Committee's central work programme.

We do not have the right expertise in the team to draft planning guidance.

Mitigation: Being aware that the output for this investigation could usefully be guidelines for the review of the London Plan, rather than guidance drafted as a planning professional would.

Objectives for the Project Initiation Meeting

- To agree the proposed terms of reference for the investigation.
 - To discuss the risks and mitigations identified above, as well as any risks not identified.
 - To discuss our external relations strategy and how to maximise key impacts.
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