

All change?

*the status of biodiversity
conservation in London*



**London
Wildlife
Trust**

Protecting London's wildlife for the future



Above: haymaking at Barkingside Riverside
 Top right: bluebells
 Far right: ragged-robin on a green roof

Introduction

The world of biodiversity conservation is changing rapidly. After a period of significant stability and progress following the development of Biodiversity Action Planning in the mid-1990s, and a growing input of resources from in particular public and lottery sources, we are witnessing challenges to this. The publication of the *State of Nature* report in June 2013 highlighted significant declines in species and the quality and quantity of the habitats which the sector has worked hard to protect and conserve. This has occurred in our towns and cities as much as the wider countryside.

An audit of the delivery of biodiversity conservation in London was undertaken by London Wildlife Trust and Greenspace Information for Greater London (GiGL) in 2013, with input from representatives of the London Biodiversity Partnership and London Boroughs Biodiversity Forum.

It draws upon a wide range of sources to present a snapshot of nature conservation activity in the capital as it presently is, and tries to identify trends developing over the past 5 years. Resources did not permit comprehensive analysis at a local level or allow for an examination of activities in any detail. Nor did it seek to address the status of London's natural environment *per se*. However, the findings coincide with and complement the national analysis of species and habitats set out in *State of Nature*, and the inquiry into biodiversity and greenspaces undertaken by the London Assembly's Environment Committee in autumn 2013.

The snapshot aims to inform the future work of key stakeholders within London's nature conservation sector, at a time of considerable change pressure and opportunities for the conservation of the capital's biodiversity.



A legacy to be proud of

In London the nature conservation sector has made significant and sometimes bold steps to conserve the capital's natural heritage against some profound pressures. Indeed, since the early 1980s it has arguably helped to transform London – the way it looks, the way it works and the way we feel about it. The protection, conservation and enhancement of biodiversity has been integrated into many areas of policy and practice. It has been strengthened by international support and significant resources from the public, voluntary and private purses.

The work of London Wildlife Trust, London Ecology Unit and others from the mid-1980s has helped to embed protective policies into local plans, and identified a suite of over 1500 wildlife sites to complement those statutorily designated – a first for any city. The renaissance of green – or living – roofs and walls can be traced to work by London conservationists in the late 1990s, and the advances in making our formal parks more wildlife friendly have been secured in particular by ecologists in the London local authorities working with a range of partners. Increasingly collaborative approaches through Biodiversity Action Planning from the mid-1990s have demonstrated innovative means to secure biodiversity gains. For example, the London Rivers Action Plan has shown the art of the possible in breaking the concreted culverts out of their strait-jackets, and breathing new life to the Thames' tributaries.

By the turn of the 21st century over 50 organisations were involved in the delivery of Biodiversity Action Plans and other means of activity to further nature in London. The emergence and development of digital technologies and communication from the late-1990s, made it ever easier to share information and promote best practice.

The establishment of the Greater London Authority in 2000 helped to embed the strategic protection of London's wildlife sites, and through the Mayor's Biodiversity Strategy set out a plan to help further conservation across a wide range of policy and practice fronts.

Collaborations with developers, landscape architects and architects from the early 2000s, through concepts such as Design for Biodiversity and natural resilience, from the early 2000s have endeavoured to demonstrate how urban regeneration can minimise its impact upon and create space for wildlife. The creation of the London

Wetland Centre and Rainham Marshes as regional 'crown jewels' has shown that large wild spaces have a place in the city, and have triggered plans for further wetland 'destinations' in north London. A growing body of evidence has demonstrated the value of nature to people's mental and physical well-being, and the role that ecological systems can play in making London a climate-resilient and more comfortable city in which to live, work and play.

However, with changes at a governmental level to legislation, policy and financial priorities, the sector is entering a period of some instability. The ability to meet the challenges of the *State of Nature's* narrative, let alone the changes occurring to the frameworks with which we have worked constructively and collaboratively, are being undermined by resource constraints, and emerging pressures which may be particularly acute in London.

Changes a foot?

Following the election of the current Government in 2010 and the publication of the *The Natural Choice; securing the value of nature* in 2011 (the Natural Environment White Paper (NEWP)), many of the frameworks and resources previously allocated to biodiversity conservation have undergone significant changes. Some Governmental organisations have been radically restructured or abolished. Others have had their funding dramatically reduced. The government's focus on economic growth also coincides with a remarked interest in the economic value of nature, and how that may be used to conserve our natural heritage.

As a result, some of the structures for delivery across much of the country (and in London) have been revised or dismantled. The role of London Biodiversity Partnership has diminished through the withdrawal of funding for administrative support. Current interest and commitments towards green infrastructure (to deliver ecosystem services) have given rise to a more holistic but more competitive landscape for the conservation of biodiversity.

Given the speed of these changes and an uncertain future for the natural environment set out by Government, both at a national and regional level, we believe it is imperative to take a stock-check of biodiversity conservation within London in order to identify key priorities for the immediate future.



New paradigms for nature

Nature conservation in London is constantly evolving, responding to our scientific knowledge, cultural fashions, economic environment and political agendas. A number of new concepts and frameworks have emerged in the past five years which present opportunities and challenges for the sector.

Ecosystem services

These are the processes by which the environment produces resources utilised by people such as clean air, water, food and materials. They can be defined – and valued – in various ways. The Millennium Ecosystem Assessment provides a comprehensive assessment of the state of the global environment to date, and classified ecosystem services as follows:

- Supporting services: including soil formation, photosynthesis, primary production, nutrient cycling, and water cycling.
- Provisioning services: such as food, fibre, fuel, genetic resources, natural medicines, and fresh water;
- Regulating services: including air quality regulation, climate regulation, water regulation, and pollination;
- Cultural services: such as spiritual enrichment, cognitive development, and aesthetic experiences.

London's collective habitats generate a range of ecosystem services, for example 7 million trees provide canopy cover for 20% of London, helping to mitigate air pollution and climate impacts within the city. However, assessing the economic contribution that nature makes to the city's well-being is

considerably more complex, and there are concerns held that placing a monetary value on the natural environment may lead to its substantial undervaluation.

Green infrastructure

Green infrastructure (GI), subject to a broad set of definitions, is usually considered the network of high quality green and 'blue' (aquatic) spaces and other environmental features - the fabric of wildlife sites, gardens, playing fields, parks and vegetated elements associated with buildings (such as living walls and roofs) that flows through the city, and connect with the wider countryside. Some interpretations of GI focus heavily on the ecosystem services it provides, such as swales and green roofs, and do not necessarily consider biodiversity conservation objectives.



The All London Green Grid provides London with a GI strategy, but even if successfully delivered it is unlikely to meet all the requirements for nature conservation in the capital.

National Planning Policy Framework

The NPPF has streamlined the government's planning policy for England, significantly reducing the scale of guidance that existed until 2012. It purports to establish a framework for local authorities to have more control of planning in their area, but has clearly placed a strong emphasis in reducing uncertainty of decisions, and aiming to better stimulate sustainable development. Whilst the policies for the protection of the natural environment appear reasonable, it is still too early to assess how the NPPF will play it in decisions affecting wildlife, particularly in respect of protected species and non-statutory wildlife sites (the majority, in London).

Local Nature Partnerships

Local Nature Partnerships (LNPs) were identified in the NEWP as a need for local areas to work in a joined up and strategic way to help manage the natural environment to produce multiple benefits for people, the economy and the environment. LNPs should work to improve the natural environment through a partnership comprised of local people, organisations and businesses. An LNP for London was registered by a partnership of organisations in 2011 but remains undeveloped due to questions as to its purpose considering other fora and partnerships in place.

Biodiversity off-setting

Biodiversity offsets are conservation activities that are designed to give biodiversity benefits to compensate for losses - ensuring that when a development damages nature (damage which cannot be avoided) new, bigger and/or better sites for wildlife will be created. They need to show measurable outcomes that are sustained over time.

Government is committed to introducing offsetting to assist in planning decisions; a Defra 2-year pilot study commenced in April 2012 to monitor the impact of offsetting in six areas across England (all outside London). Participating local authorities were required to publish a strategy identifying target areas and habitats for creation though offsetting processes; progress has been slow to date and no offsets have been delivered. A Government Green Paper, *Biodiversity Offsetting in England*, was published in September 2013 for consultation to



November, some time before the six pilot studies were completed. Government is set to report in early 2014.

Landscape approaches

Making Space for Nature highlighted a need for increased focus on landscape scale conservation to reverse the impacts of habitat fragmentation and isolation. These aim to engage broader partnerships of landowners and stakeholders to secure biodiversity gains. Landscape approaches to conservation across London are being developed, including those of two long-standing regional parks, two Nature Improvement Areas (a commitment of the NEWP), a number of Living Landscapes, and newly emerging catchment partnerships.



Top left: Wormwood Scrubs at dawn © David Lindo

Bottom left: swale in Woodberry Down

Top right: reedbed at Crossness Nature Reserve

Bottom right: greater yellow-rattle



Key findings

Framework change

The publication of the Natural Environment White Paper in 2011 brought about a marked change. This introduced new thematic initiatives, but also involved the dismantling of national and regional biodiversity action planning, and structural and resource cuts to government departments and agencies. It has coincided with a perceived lack of leadership for conserving London's biodiversity partly due to changing priorities of the Greater London Authority. Inevitably organisations need to respond to this changing environment in order to respond effectively to the Government's emerging policies and priorities.



Top: the changing London skyline from Norwood Park

Above: orange-tip butterfly

Right: habitat surveying

Top right: water vole © Terry Whittaker

Bottom right: Himalayan balsam

Planning and development

The planning context at a national level has dramatically changed in the last few years. *The London Plan* awards protection to strategic wildlife sites and embeds targets for habitat restoration and creation, together with commitments towards urban greening. However, the National Planning Policy Framework, which establishes a presumption in favour of sustainable development albeit with an emphasis on economic growth, may have arguably weakened biodiversity protection, although it is too early to determine.

All London local authorities have policies in place to protect and enhance biodiversity through Local Plans but it is unclear who is monitoring their implementation. The ability for planners to interpret applications from an ecological perspective has been challenged by rapid turnover of staff, in addition to pressures on resources. An estimated 90% of planning officers have insufficient ecological knowledge to make effective decisions in regard to the natural environment. With over 90,000 planning applications being submitted each year in London there is a high chance that biodiversity is not addressed with sufficient scrutiny for anything other than statutory implications (e.g. Sites of Special Scientific Interest).

Wildlife sites

Wildlife sites are fundamental to biodiversity conservation. London boroughs collectively recognise 1557 Sites of Importance for Nature Conservation (SINCs) covering over 30,000 hectares and 19% of London's total land area. The level of protection awarded

is subdivided into the following categories - Sites of Metropolitan (SMI), Borough and Local Importance. The Greater London Authority helps designate SMIs. Other elements are delegated to the boroughs but there is now no coordinating body to comment on planning applications or accurately record and promote positive management across the SINC network.

Data collection and management

The need for up-to-date biodiversity data has increased to inform planning and land management decisions. Greenspace Information for Greater London (GiGL) actively records positive management and is working with its partners to keep centralised and current data on London's habitats, protected species and designated sites. While there are some boroughs that have recently surveyed the condition and original designation of their SINCs network (and as a result are reviewing these for their Local Plans) most are not. A few boroughs have SINC data that hasn't been reviewed for 20-25 years.



Over 40 organisations are funding partners of GiGL, including 28 of the 33 London boroughs. A further 20 voluntary organisations regularly supply environmental data for use by the GiGL partnership.

Biodiversity Action Planning

The London Biodiversity Partnership has published, reviewed and wholly or partly delivered on 8 Species and 11 Habitat Action Plans under the London Biodiversity Action Plan (2000, last reviewed 2008). However, the majority of Action Plan working groups coordinating action plans have not met for some time and are not currently active (bar those for bats, water vole, reedbed, and rivers & streams). Some plans continue to be implemented but there is a lack of support in terms of resources and a changing political context. The UK Biodiversity Action Plan (BAP) process has ended and the national approach through the England Biodiversity Strategy is relying on local coordination with fewer resources.



Most London boroughs have adopted BAPs through local partnerships. Though there are many new and renewed borough BAPs, some remain inactive, undeveloped or un-adopted. It is unclear how or whether biodiversity conservation delivery is formally adopted as a 'statement of intent' within these boroughs. Some action plans have been completed. Others are being delivered through other mechanisms, although there is a danger biodiversity outcomes are being lost or diluted as a result.

Access to nature

There is a growing body of evidence outlining the benefits of access to nature for health and wellbeing. The area of deficiency in access to nature to the nearest accessible SMI or SBI is nearly 25,000ha in 2009 (c15.6% of London's total area). Several boroughs are addressing this issue through strategic frameworks like the All London Green Grid.



Invasive species

London's nature is characterised by a high proportion of non-native plants and animals, some of which are invasive (or problematic) in character. The impact of Invasive Non-Native Species in the capital is confined to a relatively small number of species and particular circumstances. London's Invasive Species Plan has been published by the London Invasive Species Initiative; 11 species are highlighted as a management priority; most notably Japanese knotweed, Himalayan balsam and giant hogweed.



Urban rusticism

London has experienced a growing trend for local ruralistic activities since the mid-2000s. Beekeeping, guerrilla gardening, 'pictorial' meadow-making and local food-growing are just some expressions of this 'urban rusticism' which demonstrate the energies within many local communities, and the potential for nature conservation organisations to reach broader audiences. However, many such projects – driven often via social media - lack strategic coordination or link into existing programmes of biodiversity conservation activity. These are challenges for the sector, both in terms of effective engagement and resource demands.



Local support

Hundreds of 'friends' groups of local parks and spaces are now active in various ways across London. Many are directly involved in biodiversity conservation – and others want to become more involved in this respect. These groups could have a significant role in meeting strategic conservation priorities but expectations may be unrealistic, especially without support from local authorities. Demand for support from local authorities

Top: solitary bee (*Andrena* sp.) © Penny Frith
 Above: common lizard © Tristan Bantock
 Right: strimming chalk grassland
 Top right: Bexley Woods

may become greater under further cuts, and some local authorities are investigating different governance models in respect of some parks and greenspaces.

Thinking big, delivering strategically

Landscape scale approaches are increasingly recognised as the contemporary paradigm for biodiversity conservation management. Seventeen approaches are being developed in London - such as Nature Improvement Areas and Living Landscapes - which recognise important characteristics or specific project areas in the region. The All London Green Grid helps to provide a framework for these, although its implementation is at an early stage.

London's foundations

Geodiversity underpins London's landscape heritage. The region contains 7 Geological SSSIs, 30 Regionally Important Geological Sites and 23 Locally Important Geological Sites. However, integration of geodiversity conservation into planning and land management decisions is still poorly developed.

Resources

Priorities for delivering biodiversity conservation are being affected by significant reductions to funding, especially across the public sector. For London boroughs the focus is increasingly on management planning and community engagement projects. A substantial impact has already been felt due to previous cuts, and the planned 10% spending cut by local government for 2015-16 is likely to have further adverse implications for biodiversity conservation. Half the boroughs responding to a survey reported a reduction in biodiversity funding between 2007-12; financial constraints and loss of staff were the most common challenges encountered. Alternative sources of funding and ways of working need to be sought to offset declining resources.



Conclusions

Biodiversity conservation in London has made significant impacts to address the pressures on wildlife habitats and species since the emergence of a discrete professionalised sector in the 1980s. Campaigns and advocacy have been influential in changing public attitudes and affecting political agendas. The legislation and policy has been strengthened over the past 30 years to protect and conserve London's biodiversity. In the past 15 years innovative steps have been taken, such as green roofs and swales, to improve the way our city is designed to protect and provide new space for wildlife.

However, the changes brought in since 2010 are creating uncertainties for the future of London's natural environment. Whilst The London Plan and other Mayoral strategies provide some comfort in respect of the strategic protection for biodiversity, the pressures to secure economic growth – as well as accommodate a growing population – are likely to make it more difficult to achieve adequate protection for wildlife, especially within an economic environment that is pulling resources away from the conservation sector. Indeed, there appears to be less commitment from the Greater London Authority than there once was. The London Assembly Environment Committee's report on biodiversity in November 2013 highlighted that the Mayor's Biodiversity Strategy of 2002 required a refresh – and that the Mayor needed to demonstrate leadership for the capital's natural environment.

The London Biodiversity Partnership has achieved much, but the loss of core resources from 2010-11 has led to a decline in activity and the need to reassess its work in relation to this changing political environment.

The All London Green Grid provides an aspirational framework to extend and enhance London's network of green spaces, within which many can help deliver significant gains for biodiversity. Nevertheless, the ALGG is still at an early stage of its development, and biodiversity conservation is just one of its 'multi-functional' objectives. In addition there are some core strands of biodiversity conservation that are unlikely to be effectively delivered through the ALGG, such as the surveying and monitoring of wildlife sites.

The formation of a Local Nature Partnership (London has yet to establish one) may help to achieve this, although how this be configured and best expressed within the spirit of LNPs as set out in the NEWP is yet to be explored.

Nevertheless, the passion to protect and conserve London's natural environment is still strong. The paradigms of green infrastructure, landscape scale approaches, urban rusticism and biodiversity offsetting, are evolving - and fast. We collectively need to make these effective and robust for nature by engaging in them and ensure that the legacy of London's nature conservation achievements to date are strongly embedded. Nature needs to be part of London, and London needs her nature.



Meeting the challenges of change

In spite of significant constraints the biodiversity conservation sector needs to embrace opportunities for working collaboratively and creatively. London is witnessing increased regeneration activity around 'Areas of Opportunity' (e.g. Nine Elms and Park Royal) in addition to significant investment in transport infrastructure like CrossRail and HS2. Many of these areas support important wildlife habitats; inappropriate developments could have significant adverse impacts on London's natural assets. A robust and consistent biodiversity conservation message, and actions to support it, are required to help protect and enhance nature within these challenges.

The following recommendations, by no means exhaustive, have been made as a result of information provided in this audit.

- The regional BAP habitat targets embedded in The London Plan are still a valid objective for delivery, and should form the core of any collaborative and individual actions.
- Strong leadership is required to tackle emerging challenges for biodiversity conservation in London. Existing partnerships need support and a level of direction currently not demonstrated by the Mayor.
- A Local Nature Partnership (LNP) for London should be investigated to help complement existing activity in an efficient and co-operative way, and help secure key biodiversity conservation gains through other partnerships, for example the All London Green Grid.
- The London Biodiversity Partnership's existing structures are too weakly resourced to maintain the level of support for delivery once enjoyed. Consideration should be given to dissolve those

elements of the LBP that no longer serve a purpose, and identify actions required to take forward the leadership and support referred to above.

- Emerging and existing nature partnerships need to support biodiversity planning which contributes to regional BAP targets in The London Plan and London BAP, and the local targets in LBAPs.
- Habitat creation and restoration data needs to be routinely shared with GiGL to maintain a contemporary dataset for London.
- London boroughs need to be supported to develop and implement biodiversity planning and local nature strategies where it is locally advantageous to do so.
- The absence of a strategic oversight of development control decisions on SINC's and other biodiversity in London requires urgent assessment, and options to best address this identified as a medium-term priority.
- Regular monitoring, information sharing and a systematic evidence-based approach needs to be employed to manage Invasive Non-Native Species across London. Management approaches including negative records should be shared with GiGL and LISI.
- Nature conservation partners need to further their engagement with Green Flag Award and other benchmarking standards in order to help further embed biodiversity in public open spaces, and to ensure that a portfolio of nature reserves and other sites, where the primary purpose is nature conservation, achieve GFA.
- Landscape scale conservation approaches are developing in different ways; means to identify how best they are embedding biodiversity conservation objectives should be sought to ensure that lessons are learnt and best practice measures can be disseminated.

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www.wildlondon.org.uk/biodiversity-conservation-audit-2013

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