



## Biodiversity Net Gain – Speaker Mike Waite and Annual General Meeting, Wednesday 8<sup>th</sup> November 2023

Background note from the Chair for The Friends' discussion of biodiversity

### WHERE NET ZERO MORPHS INTO NET GAIN Two wholly new challenges facing local authorities

From the end of World War Two primary legislation that was developed for the town and country planning field has guided and controlled Britain's environment to massive benefit – dozens of new towns, scores of town expansion schemes, even new cities like Milton Keynes; and much related infrastructure like the Channel Tunnel, the Victoria Line, the Elizabeth Line, HS1 and even HS2, plus thousands of miles of motorway have transformed living, working, and travel conditions for millions of people. Britain's population in 1947 was 48m. It is now 67 million, and rising quite fast.

#### A shift of emphasis

The present decade however is posing two very different types of challenge. First, through new laws to eliminate noxious fumes from the atmosphere by adjusting domestic, industrial, and commercial heating, including changing our forms of transport; and by planting trees, and adopting other greening measures to get net carbon emissions down to zero as agreed at COP 20. Second, through new laws to require local authorities to secure improvements in biodiversity in the natural world, through a system of bartering – where loss of biodiversity in one area through accessing infrastructure development is compensated for by systematic improvement in biodiversity elsewhere. Under this new law – the Environment Act 1920 – developers could even buy credits from Natural England as part of future national projects. Both approaches – **net emissions of carbon to zero by 2050**, and **net gain in biodiversity through site substitution**, in practice however, present wholly novel challenges to our system of local government – for which it is largely unprepared. (Surrey, it should be said, through, its Nature Partnership (SyNP) will provide specialist support, and the Surrey Wildlife Trust will continue to advise ten of the local planning authorities across Surrey).

London authorities and those elsewhere may not be so fortunate. The head of the Chartered Institute of Ecology and Environmental Management (CIEEM), Sally Hayns, writing in the Town Planning Institute Journal says less than a third of local planning authorities have 'in house' advice; that cuts in planning services does not help; that staff lack support, and that biodiversity assets are already not well managed. Joe Heath at the Land Trust has found the great majority of residential site developers working with local authorities a challenge over BNG. A solicitor working for Dentons, the developers, reckons the gain in BNG delivered is not worth the cost when sites are small. The Director of Ecological Planning Research, again writing in the Journal, sees almost insurmountable problems when site substitution means creating BNG in a different local authority area. Yet this is said to be one of its selling points. The whole system would also seem prone to abuse, given inherent complexity in financial management.

#### Applying the new approach

Scope to achieve net gain in biodiversity within any one local authority area will clearly depend on its inherent character. The new law recognises this. The County of Surrey and the conurbation of London are polar opposites in this respect though close neighbours. The one predominantly rural, with much land designated as AONB and AGLV – and increasingly so – whereas London is heavily urbanized; Croydon particularly so. Between these two local authorities lies our South London National Nature Reserve; part of the North Downs, bought 140 years ago by the City of London, and managed directly on site in Coulsdon via long term environmental plans, drawn up with sustaining biodiversity as its main aim. An object lesson to both authorities!

In preparing for the new legal requirements regarding biodiversity Surrey has, identified 63 places across the County as habitat areas of principal importance. These it calls Biodiversity Opportunity Areas – they cover Thames Basin Heaths (7), Thames Basin Lowlands (4), Thames Valley (5), North Downs (9), Wealdon Greensands (13), Low Weald (7), and

River Valleys (6). As for identifying places across the County where biodiversity might be strengthened by 'off site' habitat development, the County has identified so far just principal possible locations – each closely adjacent to the North Downs, and to Coulsdon! They are: Farnham through to Redhill; the Homesdale just east of Redhill; and the Mole floodplain immediately south of Reigate-Redhill.

#### Bringing BNG to built up London

Croydon is among London's largest boroughs, both in geographical scale and size of population. It has 127 open spaces – parks – with the southern half of the borough among the greenest in the whole of London. With the end of planned 'overspill' to divert people and business away from the Capital, the borough has undergone a decade of 'intensification' – expressed in the demolition and redevelopment of older suburban housing, and with large scale projects to provide 'high rise' housing around the town centre. While there is doubtless scope to enhance biodiversity among its 127 parks, the greater scope is likely to occur to the west of the town centre where aging commercial and industrial development around the Purley Way, involving much derelict and under-used land, could secure 'off site BNG'.

Graham Lomas  
Chair, The Friends

#### MIKE WAITE

Director, Research and Monitoring, Surrey Wildlife Trust and member of the Chartered Institute of Ecology and Environmental Management. Mike oversees research and monitoring for the Trust's strategy on landscape conservation; and chairs Surrey Nature Partnership's biodiversity working group. An experienced ecologist with experience in forward planning, policy development, impact assessment and mitigation, he is involved in habitat management and spaces protection including of higher plants, birds and even spiders. He was instrumental in publication of the GLA's biodiversity strategy – the first in the UK.

Mike's talk will help The Friends think through these issues as we face the prospect of more intense infrastructure development across South London.

#### GRAHAM LOMAS

Graham helped form The Friends of Farthing Downs and Happy Valley over fifteen years ago. He has been involved in strategic planning for 60 years, holding posts in the GLC, at Manchester University, Birmingham City Council, and via a Fellowship in American Studies at Harvard University and M.I.T. He has been an External Examiner at seven UK University Planning Departments