**21.59** High quality designs for living green walls incorporating vegetation over a building's vertical surface should also be considered in new developments. Vertical surface areas of proposed living green walls should be included in the UGF calculation but not be added to the site's total area. A green wall's efficacy depends on how it is constructed, operated and maintained, and it has to be ensured they are sustainable, through for example using drought-resistant and local plants as well as recycled water for drip irrigation.

**21.60** Living green walls as well as green roofs can help adaption to a changing climate, improve air quality and address biodiversity loss. In addition, a greener urban environment is critical to improving the health and wellbeing of local communities.

## Policy 39

### Biodiversity and Geodiversity

A. In accordance with London Plan Policy G6 (Biodiversity and access to nature), the Council will protect and enhance the borough's biodiversity and geodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats and stepping-stone sites that connect wildlife or ecological corridors. This will be achieved by:

1. protecting biodiversity in, and adjacent to, the borough's designated sites for biodiversity and nature conservation importance (including buffer zones) against inappropriate development; this includes sites of international or national nature conservation importance, such as Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs) or National Nature Reserves (NNRs) as well as those of London- and boroughwide importance, including Local Nature Reserve (LNRs) and Sites of Importance for Nature Conservation (SINCs);
2. protecting and conserving priority species and habitats that sit outside the nature conservation network of designated sites, including protecting other existing habitats and features of biodiversity value on non-designated sites as well as dark spaces that are important for some species, and promoting opportunities for their enhancement by using the Richmond Biodiversity Action Plan's aim and actions;
3. protecting ecological or wildlife corridors from development which may destroy, impair or harm the integrity of the corridor;
4. requiring development to deliver robust and measurable net gains for biodiversity in accordance with good practice principles for Biodiversity Net Gain (BNG) by incorporating and/or creating new habitats or biodiversity features, such as expansion and improvement of habitats, green and blue links or habitat restoration, incorporation of green roofs and walls, tree planting as well as micro-habitat features such as bird and bat bricks and boxes, hedgehog gates or wildlife ponds in line with other policies of this Plan;
5. requiring the following development proposals to provide a *minimum* measurable ~~2~~*1*0% net gain for biodiversity, in line with the latest available version of the DEFRA metric:

    a. ~~small-scale householder applications which increase the footprint and/or floorspace of the existing dwelling;~~
    b. all development proposals, including conversions or changes of use, that result in 1 dwelling unit or more;
    c. non-residential development proposals which increase the footprint and/or floorspace;

6. ensuring development positively contributes and enhances the wildlife value of green and blue infrastructure, particularly of ecological corridors (see Policy 34 'Green and Blue Infrastructure (Strategic Policy) '); the width of new ecological or wildlife corridors will be dependent on-site specific circumstances – the larger the development / application site, the wider the corridor;

7. protecting back gardens from development which may destroy, impair, or harm their integrity,~~:~~ ~~and removing Permitted Development Rights from~~ *where possible, to ensure* new developments, including conversions and changes of use ~~resulting in a new dwelling, for all proposals that require planning permission in order~~ to protect rear and front residential garden spaces as a cumulative key wildlife habitat resource.

B. Where development would impact on species or a habitat, especially where identified in the Richmond Biodiversity Action Plan (BAP) at London or local level, or the Biodiversity Strategy for England, development proposals shall demonstrate that the mitigation hierarchy has been followed sequentially in accordance with the principles of:

1. avoid (i.e. the applicant has to demonstrate that there is no alternative proposal with less harmful impacts);
2. reduce, moderate, minimise;
3. rescue (e.g. translocation);
4. as a last resort, to appropriately compensate for any damage (e.g. deliver off-site compensation or better biodiversity value).

C. In accordance with the London Plan Policy G6 (Biodiversity and access to nature), in addition to the need to follow the above hierarchy approach, the following mitigation hierarchy will also be applied to SINC~~'~~s:

1. avoid damaging the significant ecological features of the SINC site.
2. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site.
3. deliver off-site compensation of better biodiversity value.

Adequate and sufficiently robust information must be submitted with planning applications for proposals which may affect any designated site or any important habitats, species or geological feature to ensure that the likely impacts of the proposal can be fully assessed.

D. In accordance with the London Plan Policy G6 (Biodiversity and access to nature), development proposals which seek to reduce deficiencies in access to nature and therefore help deliver robust, credible and measurable Net Gains for Biodiversity (by reducing natural green space deficiency) will be considered positively by the local planning authority.

E. Development proposals which would cause harm to a designated site with geodiversity value will not be permitted unless any damaging impacts can be prevented by appropriate mitigation measures. Development proposals which would affect a designated site with geodiversity value should seek to retain, restore and enhance the geological interest where possible.

**Policies Map designations**

Previous versions of Local Plans and their associated Policies Maps have identified Other Sites of Nature Importance (OSNIs) as those sites which have either been classified as having importance for biodiversity or have the potential to have biodiversity. This site terminology is being updated as part of this Local Plan and brought in line with the London Plan; they will now be identified as Sites of importance for Nature Conservation (SINCs). Those sites with potential for biodiversity, will be known as Candidate Sites and will be retained on a list held by the Council until such time as they are either designated as

a Site of Importance for Nature Conservation or removed from the list due to lack of qualifying criteria. At least every 10 years a review of the Richmond Sites of Importance for Nature Conservation will be carried out and any candidate sites on the list will be assessed against the criteria for designation, those fulfilling the criteria will be recommended for designation.

The Council appointed Salix Ecology to carry out a comprehensive review of sites designated for nature conservation importance in the borough. This includes reviewing existing designations as well as identifying potential new ones to ensure the borough has identified a coherent ecological network. The Nature Conservation Review was completed in 2021 and 2022.

As a result of this Review, all existing designated OSNIs will be renamed / relabelled as Sites of Importance for Nature Conservation (SINCs). In addition, the Review has recommended changes for some sites, such as:

New SINCs

Expansion areas to be added to existing SINCs

Removing areas from an existing SINC

Changing the SINC status (such as upgrades from 'Local' to 'Borough' importance) Amalgamating existing SINCs

Renaming existing SINCs

Further details, including a boroughwide map of the SINC changes, can be found in Appendix 4 of this Plan, and in the Salix Ecology Review of Sites of Importance for Nature Conservation in Richmond upon Thames, available on the Council's website www.richmond.gov.uk/open_land_biodiversity_research.

**21.61** Biodiversity is promoted through the designation of sites and areas (statutory and non-statutory), including links and corridors, that are of nature conservation and biodiversity value. The aim of this policy is to protect and enhance the biodiversity in, and adjacent to, the borough's designated sites as well as other non-designated existing habitats and features of biodiversity value. The borough's open land and rivers, including the Thames and its islands, the River Crane, Beverley Brook, Duke of Northumberland River, Longford River and Whitton Brook, including the river banks, are vital elements that support the borough's biodiversity. It is important that all these areas, and where possible green linkages between them, are protected.

**21.62** The Richmond Biodiversity Action Plan (BAP) sets out the Sites of Metropolitan, Borough and Local Importance for Nature Conservation (SINC) in the borough. The designated SINC sites as well as Sites of Special Scientific Interest (SSSI) are clearly set out in the Richmond Policies Map. [It should be noted that the current Policies Map refers to SINCs as OSNIs.]

**21.63** Sites of Importance for Nature Conservation (SINCs) comprise:

- Sites of Metropolitan Importance – strategically-important conservation sites for London
- Sites of Borough Importance – sites which support habitats or species of value at the borough level
- Sites of Local Importance – sites which are important for the provision of access to nature at the neighbourhood level.

**21.64** The level of weight given to protected sites should be commensurate to their importance and the contribution that they make to wider ecological and green infrastructure networks. The highest protection should be given to sites with existing or proposed international designations, (i.e. Special Areas of Conservation, SACs; Special Protection

Areas, SPAs; Ramsar Sites) and national designations (Sites of Special Scientific Interest, SSSIs; National Nature Reserves, NNRs). Strong protection should be given to sites of metropolitan and borough-wide importance, and commensurate protection should be given to sites of local importance.

**21.65** All development, particularly for new and replacement buildings and extensions to buildings, should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings at a ratio of one nest brick per dwelling on average are preferred, as these are suitable for multiple bird species. As outlined in the National Planning Practice Guidance, these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications, in line with best practice guidance.

**21.66** Where development proposals could affect or harm a European Protected Species or its habitat, the application will be assessed against the Habitats Regulations, and should planning permission be approved, then the developer is required to independently obtain a licence from Natural England. Where ecological surveys and assessments are undertaken, developers should make all ecological data available to Greenspace Information for Greater London (GiGL) – the capital's environmental records centre.

**21.67** Biodiversity, including the wider ecological and green infrastructure networks, play a crucial role in adapting to the effects of climate change. Biodiversity enhances and enriches the borough's landscapes and wildlife and makes a significant contribution to the distinctiveness of this unique borough, providing a sense of place, cultural heritage, tranquillity as well as opportunities for recreation and a healthier lifestyle. In addition, protecting and enhancing biodiversity, including the provision of new habitats and features, increases the resilience of our ecosystems and helps the physical environment to change and adapt to different stresses.

**21.68** This policy recognises that biodiversity interest is not just confined to designated nature conservation areas. Outside designated areas, including on previously developed land or brownfield land, there is an abundance of biodiversity features and habitats, including trees, hedges, wildlife gardens, allotments, ponds, green roofs, living walls, nesting and roosting boxes, swift and bat boxes. Darkness is also important to wildlife, and species that are nocturnal and adapted and/or dependent on dark environments are particularly sensitive to light pollution, for example from security and amenity lighting from adjacent developments (also see Policy 43 'Floodlighting and other external artificial lighting').

**21.69** The promotion of nature conservation should be treated as integral to any new development scheme, not as an 'add-on'. Layout, design, buildings, external lighting and landscaping schemes should take account of existing biodiversity features and habitats, and where applicable the need for maintaining dark environments. New development should include new or enhanced features and habitats, design (such as green roofs) and landscaping (including trees) that promote biodiversity, including provision for their management. These features must also be protected during construction works, and this may be subject to a planning condition as will subsequent maintenance and monitoring.

**21.70** Sites of Importance for Natural Conservation (SINCs), priority habitats and other ecological features outside of the SINCs network will be protected. Developments should achieve biodiversity net gain, wherever feasible and appropriate. Opportunities to enhance existing habitats and create new habitats for priority species should be maximised. Developments within areas of nature deficiency should include features to enhance biodiversity, particularly for priority species and habitats.

**21.71** Development will be expected to take all opportunities to improve access to nature - bringing nature to residents' doorstep. Development should aim to create net gains in biodiversity, leaving the natural environment in a better state than before.

**Biodiversity Net Gain**

**21.72** Biodiversity net gain is an approach which aims to leave the natural environment in a better state than it previously was. The Council will require development proposals to maximise biodiversity benefits and ecological connectivity through ensuring that biodiversity is a key consideration early in the design process.

**21.73** The Council requires developments to incorporate new biodiversity features and habitats into the design of buildings themselves as well as in appropriate design and landscaping schemes of new and/or redevelopments (including surrounding areas where appropriate) with the aim to attract wildlife and promote biodiversity where possible. This is particularly important in areas with less access to areas of nature conservation importance. Therefore, proposals should seek to include:

1. habitat restoration, re-creation and expansion;
2. improved links between existing sites;
3. buffering of existing important sites and features, such as railway lines;
4. new biodiversity features within development; and
5. securing management for long term enhancement.

**21.74** The overall priority is to secure the inclusion of on-site Biodiversity Net Gain (BNG) enhancement features. The baseline for establishing ~~20%~~ *the national minimum requirement of 10%* BNG ~~requirements~~ will be identified and achieved by undertaking a walkover survey (undertaken by an accredited ecologist) of the proposed development site. Losses and gains as a result of proposed development will be calculated using the national Biodiversity Metric. Biodiversity net gain complements and works with the biodiversity mitigation hierarchy set out in the NPPF. Any biodiversity net gain delivered as part of a compensation strategy for development should be in addition to the protection for designated sites, protected or priority species and irreplaceable or priority habitats. *Wherever possible, the Council encourages the minimum of 10% to be exceeded, through incorporation of ecological enhancements, as set out in part A of the policy. The importance of biodiversity in the borough is recognised and that due to pressures on species and habitats there is a need to protect and enhance biodiversity on sites in the borough, as well as the potential for delivering multi-functional benefits.*

**21.75** In accordance with the Environment Act 2021, development will need to comply with the following principles and guidance:

- The latest and most appropriate Department for Environment Food & Rural Affairs (DEFRA) metric or agreed equivalent should be used to quantify the baseline and post-development biodiversity value of the development site and off-site areas proposed for habitat creation. Natural England's Small Sites Metric will be appropriate for most *small sites* ~~small-scale householder applications as well as other minor development~~, whilst the Biodiversity Metric 3.1 (or later versions) should be used for other applications for development. Development proposals should also follow the good practice principles for development set out by the Chartered Institute of Ecology and Environmental Management (CIEEM).
- Major new developments:
    - should result in no net loss in biodiversity value, as assessed against the DEFRA biodiversity offsetting metric, the Environment Bank Biodiversity Impact Calculator or any metric which the Council subsequently adopts formally;
    - are required to submit a Biodiversity Net Gain plan to set out how the baseline biodiversity value has been calculated and how the net gain target will be achieved; The plan must demonstrate that the 'post-development' biodiversity

value of the development is greater than 'pre-development' biodiversity value by ~~at least 20%~~ *a minimum of 10%*.

- are required to submit a 30-year management plan, detailing how the post-development biodiversity values of the site and any supporting off-site mitigation will be achieved;
- need to ensure that any off-site habitats created are well located to maximise opportunities for local nature recovery; where off-site habitat mitigations solutions are necessary to restore and enhance a nearby designated nature conservation site or provide new replacement habitat, these should be supported by suitable ecological evidence and survey information to ensure that any off-site mitigation is suitably robust and appropriate.

- Small-scale development proposals should avoid encroachment within rear garden spaces. The Council ~~will~~ *may* remove Permitted Development Rights from ~~all~~ proposals that require planning permission to protect residential gardens, which contribute substantially to the total green space in the borough. The mosaic of gardens in the borough provides the space and diversity that organisms need to fulfil their niches. As well as providing a habitat, the mosaic of gardens also assists the movement of species between public green spaces and/or countryside, thus increasing the overall connectivity of the landscape and smoothing the effects of habitat fragmentation.

**21.76** The Richmond BAP and other relevant local strategies set out measures to protect and enhance the borough's biodiversity resource by improving the quality of the local environment through practical management, habitat creation and protection of important wildlife sites and connectivity. The implementation of the Richmond BAP is an important vehicle to improving the biodiversity of the borough.

**21.77** Any schemes for incorporating new biodiversity features or creating new habitats should take account of site constraints (such as utility infrastructure) and consider the use of native species. The species suitability and their adaptability to the likely effects of climate change need to be taken into account. Guidance on the use of native species and climate change can be found in the relevant BAP, the Mayor of London's Biodiversity Strategy and the London Tree and Woodland Framework.

**21.78** The Council will produce further planning guidance in the form of a SPD on biodiversity, specifically on biodiversity net gain, and set out for applicants and developers how biodiversity net gain can be delivered on a variety of sites, ranging from major to small-scale proposals. *The London Local Nature Recovery Strategy is being prepared and will identify opportunities for nature recovery and strategic biodiversity priorities.*

**Geodiversity**

**21.79** Geodiversity is concerned with the variety of rocks, fossils, minerals, landforms, soils and natural processes, such as weathering, erosion and sedimentation, that underlie and determine the character of our natural landscape and environment.

**21.80** Geodiversity is also a key factor in the borough's cultural identity. The geodiversity of any area is an equally important part of its natural heritage as its biodiversity. Conservation, sustainable management, educational use and interpretation of geodiversity are thus as important as that of biodiversity or archaeology.

**21.81** National policy requires sites with geological conservation interests to be protected.

**21.82** In line with London Plan Policy G9, there are currently no regionally important geological sites identified in Richmond borough, however Richmond Park is designated as a locally important geological site.