

Royal Borough of Greenwich  
**Biodiversity Report**  
2023 to 2026



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# Contents

- 1. INTRODUCTION ..... 5**
- 2. ROYAL BOROUGH OF GREENWICH ..... 6**
- 3. OBJECTIVES AND ACTIONS ..... 8**
- 4. CONSIDERATION OF NATIONAL STRATEGIES ..... 13**
- 5. RECOMMENDATIONS ..... 14**
- 6. BIODIVERSITY NET GAIN INFORMATION ..... 15**

# 1. Introduction

- 1.1. Royal Borough of Greenwich instructed Place Services to produce a report to satisfy requirements established by the introduction of the Environment Act in 2021 in the form of an amendment to the Natural Environment and Rural Communities Act 2006 (NERC Act). The requirements relate to the “the general biodiversity objective”, a statutory duty set out in Section 40 of the NERC Act, amended by the Environment Act to be: “the conservation and enhancement of biodiversity in England through the exercise of functions...”.
- 1.2. The amendment to Section 40 includes a new subsection (1) that calls for Local Authorities to “from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective.” At subsection 1C it is stated that the first consideration required by subsection (1) must be completed within a year of the amendment coming into force, which means by 1st January 2024.
- 1.3. As with many Councils across the UK, Royal Borough of Greenwich did not produce a specific first considerations report, but a Strategic Biodiversity Assessment was commissioned in early 2024 that covered the more important aspects of the biodiversity objective. The subsequent report was published in 2025 and is referenced within this document.
- 1.4. A new subsection (1A) in Section 40 states: “After that consideration the authority must (unless it concludes there is no new action it can properly take) —
  - a. determine such policies and specific objectives as it considers appropriate for taking action to further the general biodiversity objective, and
  - b. take such action as it considers appropriate, in the light of those policies and objectives, to further that objective.”
- 1.5. Section 40A inserted into the NERC Act by the Environment Act requires Local Authorities to publish biodiversity reports, with the first due within three years of the duty coming into force, which means covering the period from 1st January 2023 to 1st January 2026. These reports must be published within 12 weeks of the reporting period end date.
- 1.6. The contents of a biodiversity report are set out in the legislation to be:
  - a. “(3) a summary of the action which the authority has taken over the period covered by the report for the purpose of complying with its duties under section 40(1) and (1A),
  - b. a summary of the authority’s plans for complying with those duties over the period of five years following the period covered by the report,
  - c. any quantitative data required to be included in the report by regulations under subsection (8)(b), and
  - d. any other information that the authority considers it appropriate to include in the report.”
- 1.7. And, for local planning authorities:
  - a. “(4) a summary of the action taken by the authority in carrying out its functions under Schedule 7A to the Town and Country Planning Act 1990 (biodiversity gain as condition of planning permission) over the period covered by the report,
  - b. information about any biodiversity gains resulting or expected to result from biodiversity gain plans approved by the authority during that period, and
  - c. a summary of the authority’s plans for carrying out those functions over the five year period following the period covered by the report.”
- 1.8. This report constitutes Royal Borough of Greenwich’s first biodiversity report and presents the information required in this structure, which follows example structures provided in Government guidance:
  - Section 2 – Council Information
  - Section 3 – Policies, objectives, actions
  - Section 4 – Consideration of other strategies
  - Section 5 – Recommended Actions
  - Section 6 – Biodiversity Net Gain Information
- 1.9. The next Biodiversity Report must be produced within five years, for a reporting period that ends no later than 1st January 2031, but it could be produced sooner.

## 2. Royal Borough of Greenwich

2.1. Royal Borough of Greenwich is a London borough council created in 1965 from the metropolitan borough of Greenwich and most of the metropolitan borough of Woolwich (excluding North Woolwich). It became a Royal Borough in 2012 to mark the Diamond Jubilee of Queen Elizabeth II because of its historic links to the Royal Family and as the central location of the Prime Meridian. Its main neighbourhoods are Greenwich, Woolwich, Deptford (part of), Charlton, Plumstead, Blackheath (part of), Abbey Wood, Thamesmead and Eltham.

2.2. Its functions include:

- Adult and Children's Services
- Arts, culture and events
- Businesses and licenses
- Community safety and environmental
- Council Tax
- Housing
- Parks and open spaces
- Parking, transport and streets
- Planning and building control
- Recycling, waste collection and street cleansing

2.3. The Borough covers around 4700 hectares and has a population of around 300,000. Its northern boundary is marked by an 8.5 mile stretch of the Thames riverfront, which is home to the Maritime Greenwich United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage Site and, on the Greenwich Peninsula, The O2 Arena, formerly the Millenium Dome. To the east is the London Borough of Bexley, to the west is the London Borough of Lewisham and to the south is the London Borough of Bromley.

2.4. Across the borough, there are about 380 hectares of open countryside, most of which (300 hectares) is woodland, and just over 60 hectares in agricultural uses including horse-grazing. There are over 1100 hectares of residential gardens and 750 hectares of recreational land.<sup>1</sup> Within the Borough there is one biological Site of Special Scientific Interest (Oxleas Wood), three Local Nature Reserves and 38 Sites of Importance for Nature Conservation, six of which are Metropolitan Sites. There is also a geological Site of Special Scientific Interest (Gilbert's Pit), a Regionally

Important Geological and Geomorphological Site, and two Locally Important Geological and Geomorphological Sites.

2.5. The Council is made up of 55 elected Councillors representing 23 wards. The Leader of the Council and nine other Councillors make up the Cabinet. The Council's officers are led by a Chief Executive supported by two Assistant Chief Executives and seven Directors, who lead the Council departments.

2.6. Until the Summer of 2026 there was no Cabinet Member or Officer that had explicit responsibility for biodiversity. However, this is changing following changes in Cabinet briefs and a recruitment process undertaken for a dedicated Biodiversity Officer. The Director of Communities, Environment and Central has service responsibilities including sustainability and management of open space. There is no Council decision-making body whose function explicitly includes matters of biodiversity, or its conservation and enhancement.

### Council services

#### Planning and development management

2.7. The Royal Borough's Local Plan sets out the policies that direct where and how development will be permitted across the administrative area. This includes allocating land parcels for future development, but also planning policies specifically aimed at conserving and enhancing biodiversity. Full consideration of planning policy in relation to biodiversity is included in chapter 3.

#### Parks, Estates and Open Spaces

2.8. The Council manages a wide variety of parks and open spaces across the Borough, including some supporting significant biodiversity value that are designated as Sites of Importance for Nature Conservation (31 in number). There are management plans for 15 Green Flag sites that include semi-natural habitats and there is a management plan for Oxleas Wood Site of Special Scientific Interest that is currently in draft.

2.9. Within the Council's parks and cemeteries, there are areas of grassland managed for wildflowers and other

<sup>1</sup> [www.gov.uk/government/statistics/land-use-in-england-2022](https://www.gov.uk/government/statistics/land-use-in-england-2022)

nature conservation outcomes, and woodland habitat and ponds are managed for biodiversity.

### **Property and facilities**

- 2.10. The Council owns and maintains buildings and other assets that may be used by protected and Priority species, such as bats and nesting birds, with actual or potential biodiversity value in any associated green infrastructure. A robust approach to ensuring that legally protected species are unaffected by maintenance works should be in place.
- 2.11. At present, contractors commit to meeting all legislative requirements and method statements are checked by the Council's Fabric Contracts Manager. Recent guidance on ensuring legal compliance in relation to bats affected by large scale housing maintenance projects could be of relevance.
- 2.12. The Council owns housing stock that may be used by protected and Priority species, such as bats and nesting birds with actual or potential biodiversity value in any associated green infrastructure. When maintenance and repair work is necessary, consideration of impacts to biodiversity or potential for enhancement are not routine, unless planning permission is required. Opportunities for enhancing biodiversity by putting up bird boxes are being considered.
- 2.13. If legally protected species such as bats or nesting birds are discovered during works, it would be flagged to contract managers and appropriate measures are put in place, including any need for licensing.

### **Environmental Health**

- 2.14. The Council is responsible for monitoring air quality, which is primarily seen as a public health issue, although it can have an impact on some habitats and species. The Council is also responsible for more general environmental permitting, of activities that could be polluting to the environment.

### **Licensing**

- 2.15. The Council is responsible for issuing licences for events, which may include activities that have the potential to impact biodiversity, either by physical disturbance of habitats, or by noise and visual disturbance of species. Impacts to biodiversity are considered when assessing applications for outdoor events and events are not permitted in ecologically sensitive areas, based upon staff knowledge. There are no questions related to biodiversity on licence application forms and applicants are not required to submit ecological information.

### **Public information**

- 2.16. Communication with residents by various means provides the opportunity to inform them of issues around biodiversity and to encourage engagement and positive action.

# 3. Objectives and actions

- 3.1. This section sets out the objectives that the Council has set to meet the biodiversity duty, the existing policies guiding consideration of biodiversity in the planning system, and the actions it has taken for biodiversity in recent years in the form of strategies and other initiatives.

## Strategy

### London Environment Strategy

- 3.2. The current London Environment Strategy was produced in 2018 and heavily informed the London Plan, considered below. The document set out London's Priority habitats and to support the strategy, in 2019 the Mayor produced a revised London Priority Species List, which included "Opportunity Species" for which there is the most opportunity to create or enhance suitable habitats and features in open spaces and new developments.

### Our Greenwich

- 3.3. The current Council Strategy, Our Greenwich, was published in December 2022 and runs through until 2026. It is based on a vision for Greenwich in 2030 and consists of 20 missions across five themes. Under the theme of 'Place', Mission 10 is about playing an active role in tackling the climate crisis and one of the outcomes that this mission will deliver is that "The environment and biodiversity of Royal Greenwich is protected and enhanced".
- 3.4. This outcome is to be measured by a bespoke 'Biodiversity score', which is based on the number of sites registered as Fields in Trust (a recreation designation), the number of Sites of Importance for Nature Conservation, the number of parks and open spaces with grass cutting modified for biodiversity and the total hectares of parks and green space managed by the Council. The aim is to maintain these combined numbers.
- 3.5. All the measures identified against this Mission in the two published annual action plans<sup>2</sup> are based on carbon reduction. By 2024 the 'Biodiversity score' had dropped due to two sites no longer having modified grass cutting schedules.

### Carbon Neutral Plan

- 3.6. The Council declared a climate emergency in 2019 and in 2022 published a Carbon Neutral Plan. One of the seven key themes in the plan is 'Natural Environment', which recognises the importance of trees and carbon-rich ecosystems in tackling climate change. The focus of actions under this theme is "on conservation management, tree planting, restoration of habitats and delivery of net gain biodiversity through planning applications".
- 3.7. The Carbon Neutral Action Plan for 2023-2025 details the individual actions under the Natural Environment theme, with progress to 2025 and ongoing actions to 2030. The actions related to biodiversity include:
- Parks Conservation Grass Programme; maintained on parks and cemeteries and opportunities being reviewed to include Council housing land
  - Tree planting; 5000 new trees targeted by March 2026 through woodland creation with potential sites being investigated as well as the council introducing a tree management strategy
  - Restore habitats and green infrastructure; including regeneration of grass verges and review of maintenance practices

### Parks and Open Spaces Strategy

- 3.8. In April 2017, the Council adopted a ten-year strategy for the future of its parks and open green spaces within which 'Nature and biodiversity' was one of seven strategic themes – "Ensuring that areas and habitats are provided for wildlife and that they are protected from inappropriate development."
- 3.9. The objectives set out under this theme in the strategy were:
- NB1 Conserve and strengthen the network of high quality natural and semi-natural green spaces in the borough, balancing the need for protecting valuable wildlife habitats with providing residents with access to nature.

<sup>2</sup> <https://ourgreenwich.org.uk/> - Our Greenwich Plan 2023-24 and Our Greenwich Plan 2024-26

- NB2: Seek opportunities for sites supporting nature conservation features to become a focus for supporting community involvement.
  - NB3: Ensure management and maintenance regimes are appropriate to conserve and establish favourable conditions for biodiversity whilst ensuring the spaces feel welcoming and provide visitors with a sense of security.
  - NB4: Achieve favourable conservation status for the borough's Sites of Importance for Nature Conservation.
  - NB5: Consider new opportunities for improving the nature conservation value of open spaces whilst carefully balancing the need for space to support sport and formal recreational activities.
  - NB6: Ensure new spaces delivered as part of proposed development in the borough consider suitable provision of nature conservation features.
- 3.10. A five-year Action Plan was developed to implement the Strategy and was adopted in December 2017. This set out a range of ongoing actions involving community engagement, education, interpretation and site designation, but also specific biodiversity projects such as:
- Replacement tree programme for Sutcliffe Park
  - The creation of a new wildflower area in Queenscroft Park
  - Ecological surveys of conservation grass areas
  - A review of maintenance regimes at all parks and open spaces
- 3.11. The strategy is still valid, but more recent actions and outcomes are unpublished.
- of development in a broad sense, including aspects such as events planning and lighting.
- 3.14. Chapter 8 covers Green Infrastructure and Natural Environment. Policy G3 gives Metropolitan Open Land the same status as Green Belt, meaning that it should be protected from inappropriate development and opportunities should be explored for its enhancement, including habitat creation. Biodiversity is identified as a function of Metropolitan Open Land.
- 3.15. Policy G5 Urban Greening requires that "Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage." Biodiversity is cited as one of the benefits of Urban Greening.
- 3.16. Policy G6 Biodiversity and access to nature covers the need to protect Sites of Importance for Nature Conservation and a requirement for development plans to be based on up-to-date information about the natural environment and local ecological networks. The policy goes on to highlight the need for development plans to support the protection and conservation of priority species and habitats, and to seek opportunities to create other habitats and ecological features, particularly in an urban context. Policy G6 includes the clause "Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.", which extends the requirement beyond the statutory net gain requirement established by the Environment Act.
- 3.17. Policy G7 covers trees and woodland, with the stated aims of increasing tree canopy cover by 10% by 2050 by protecting and maintaining existing trees and woodlands, especially veteran trees and ancient woodlands, and planting new trees and woodlands in appropriate locations.

## Policies

### London Plan

- 3.12. The London Plan was published in 2021 as the overall strategic plan for Greater London, setting out an integrated framework for the development of London covering the economy, the environment, transport and social matters. It forms a part of the Development Plans of all the London Boroughs and must be taken into account when planning decisions are made.
- 3.13. Many of the Plan's policies include reference to improving biodiversity and minimising the impact

### Adopted Local Plan Policies

- 3.18. The existing Royal Greenwich Local Plan was adopted in July 2014 to guide development in the Borough through to 2028 and operates alongside national planning policy and the London Plan. A new Local Plan is in preparation, and the latest version went out to public consultation at the end of 2025. Emerging policies are considered under the next heading.

- 3.19. Relevant Local Policies contained within the adopted Local Plan documents are briefly summarised below.
- 3.20. Policy OS1 Open Space covers the safeguarding and enhancement of open spaces including the designation of Metropolitan Open Land, which has a biodiversity function.
- 3.21. Policy OS4 Biodiversity states that biodiversity and geodiversity will be “protected, restored and enhanced” and includes a presumption against the development of Sites of Special Scientific Interest, Sites of Importance for Nature Conservation, Local Nature Reserves, Regionally Important Geological Sites and Locally Important Geological Sites. The policy says that enhancement will be particularly encouraged where there are areas deficient in accessible wildlife sites.
- 3.22. Policy OS(e) Wildlife Deficiency Areas sets out that opportunities to secure the provision of managed wildlife habitats will be taken in or near areas of wildlife deficiency and that opportunities for access will be maximised where there is no conflict with disturbance to wildlife.
- 3.23. Policy OS(f) Ecological Factors sets out the factors that it is expected will be the particular focus of consideration as part of any development proposals. These include:
- Biodiversity and geological features of the site and the surrounding area
  - Surveys of flora and fauna on SINC and any site over 1ha
  - The retention, protection and enhancement of natural features that contribute to the site’s biodiversity
  - The protection, enhancement and restoration of natural river features and corridors
- 3.24. Policy OS(g) Green and River Corridors requires the protection of main green corridors and the rivers, canals, and lakes within the Borough, with a presumption against any development that disrupts their connectivity. The main green corridors are stated in the supporting text to be:
- The railway line between Blackheath and Falconwood
  - The Plumstead Railway cutting
  - The Ridgeway
  - The Railway Line between Lee and New Eltham

- 3.25. The supporting text also makes reference to the Green Chain through Woolwich Cemetery, Plumstead Common and Bostall Woods. The river corridors are listed as the River Thames, the Ravensbourne and the Quaggy River, which together with the Thamesmead canals and lakes are important for aquatic wildlife.
- 3.26. Policy E(f) Living Roofs and Walls states that new build development proposals should include living roofs or walls within their design, with the living roofs to be designed to maximise biodiversity benefits.

### **Royal Borough Greenwich Urban Design Guide Supplementary Planning Document**

- 3.27. This document was adopted in October 2023 and is intended to provide clear design principles to developers with the aim of ensuring the submission of high-quality development proposals. If followed, the design principles would deliver places that are safe, and attractive with sustainability, economic and environmental well-being, and quality of life at their core. The document also sets out the standard by which development proposals are to be assessed by council officers and members.
- 3.28. The most relevant principles in relation to biodiversity are:
- PRINCIPLE B.10: Consider and connect to strategic open spaces / green and blue infrastructure, which calls for the enhancement of existing green and blue infrastructure and the integration of natural features into development design
  - PRINCIPLE B.11: Contributing to net-gains in biodiversity and ecology, which calls for the protection and enhancement of the existing network of landscapes, habitats and species, the creation of biodiverse open space in areas of inadequate provision and the incorporation of biodiversity net gain as a starting point for design
  - PRINCIPLE E.4.3: Design to enhance biodiversity, which requires new development to contribute net gain in biodiversity, favour native trees and plants, incorporate existing landscape features, and retain existing trees

### **Climate Resilience Supplementary Planning Document**

The Council adopted this SPD in March 2026 in response to the ongoing transition to a low-carbon future, as set

out in their Carbon Neutral Plan, published in 2021, and including recommendations from a Climate Resilience Review published in 2024. Chapter 2 of the SPD - 'Greening the grey' - relates specifically to the need to increase outdoor planting as a means of improving climate resilience to benefit biodiversity as well as addressing flood management, air quality and heat risk.

3.29. The document provides extensive information about the ways in which developments can be designed to incorporate measures that will have a significant benefit for the Council's climate and biodiversity ambitions.

## Emerging Local Plan

3.30. The Emerging Local Plan in its current form, has frequent references to biodiversity throughout introductory sections and in spatial visions and individual site allocation policies. Specific policies are set out in Chapter 8: Environment:

- EN1 Green and Blue Infrastructure; this policy requires green infrastructure to be protected and enhanced and included in new developments with a variety of functions. Reference is made to the London Local Nature Recovery Strategy, which should be considered when designing green infrastructure.
- EN2 Open Space; this policy is based on the protection and enhancement of all open space, with particular reference to Metropolitan Open Land and Borough Open Land and recognising biodiversity as one of the functions of open land.
- EN3 Biodiversity; this policy makes a commitment to enhance biodiversity and to ensure that new development makes a positive contribution to the natural environment. It states that development on Sites of Importance for Nature Conservation will not be supported. The policy goes on to require biodiversity net gain to be maximised and considered from the earliest stages of design, with a priority for onsite gain. Offsite gain should be delivered within the Borough wherever possible.

## Other Actions

### Royal Borough of Greenwich Sites of Importance for Nature Conservation Review

In 2024, Royal Borough of Greenwich commissioned a review of all the existing designated Sites of Importance for Nature Conservation (excluding Metropolitan sites)

together with two sites recommended for selection in 2016 that had not been accepted into the network. The review resulted in a new register of sites, amounting to 32 Borough sites – 20 Grade I and 12 Grade II – and 16 Local sites in addition to the six Metropolitan Sites. The proposed changes to the SINC portfolio will be considered for adoption by the Wildlife Sites Board in mid-2026.

### Royal Borough of Greenwich Strategic Biodiversity Assessment

3.31. This report was commissioned in 2024 as a follow up to the Sites of Importance for Nature Conservation Review and was intended to provide guidance on ways in which biodiversity could and should be conserved and enhanced across the Borough. It provides the following:

- A review of national and local policy and strategy relating to the conservation and enhancement of biodiversity, including detailed information about the implementation of biodiversity net gain
- A summary of the environmental conditions that underpin the existing biodiversity resource and that will dictate the effectiveness of habitat creation and enhancement measures, including geology, soils, hydrology, historic land use
- Information about the existing local ecological network, made up of statutory and non-statutory designated sites, including geological ones
- An assessment of the extent and condition of Priority habitats and the populations of Priority species in the Borough, with consideration of the most appropriate measures to conserve and enhance them
- Recommendations for the prioritisation of action to conserve and enhance biodiversity in the Borough
- Consideration of opportunities for the conservation and enhancement of biodiversity across the Borough, including mechanisms for delivery, connectivity and spatial prioritisation

### Parks, Estates and Open Spaces

3.32. This department does not have any permanent, specialist ecological expertise, although the new Biodiversity Officer (see 3.35 below) will provide this. However, biodiversity has been considered

in planning ongoing operations and through enhancement measures across the Borough's estate, including:

- The creation and maintenance of 20 conservation grass areas across the borough's parks and cemeteries
- The creation of wildflower meadow areas in 3 parks sites in collaboration with Butterfly Conservation and local 'Friends' groups
- Retention of standing and lying deadwood during maintenance operations
- Pond restoration in Oxleas Wood, and pond creation in Horn Park and Avery Hill Park in collaboration with Thames21
- Care of the River Quaggy and associated habitats in Sutcliffe Park, in collaboration with Thames21
- Delivery of a Borough-wide tree planting programme, amounting to 5000 trees in association with Highways and Housing departments
- Working with Park Friends and other volunteers to secure grants and undertake practical work for the benefit of biodiversity on greenspace sites, including dead hedging to protect sensitive habitats, installing bird and bat boxes, coppice management and removing invasive non-native species
- Planning to install leaky dams in Oxleas Wood, Bostall Wood and Cloth Workers Wood to manage flood risk and create habitat

## Biodiversity Officer

3.33. The Council is in the process of recruiting a Biodiversity Officer whose purpose will be to *"manage Royal Borough of Greenwich's Biodiversity/ Ecological response working closely with Royal Borough of Greenwich Planning and Policy departments and Parks and Open spaces. The successful candidate will also plan and manage the Biodiversity delivery programme."*

3.34. Management of the Council's response to the requirements of the Environment Act is part of the role, alongside ecological support for development management and planning policy and for the ecological aspects of the management and monitoring of parks and open spaces.

3.35. Specific actions that it is intended that the Biodiversity Officer will complete include:

- An update to the Borough's Biodiversity Action Plan
- An update to the Borough's Open Spaces Strategy
- Surveys and management plans for SINCs

## Summary

3.36. By way of summary, the actions taken to comply with the biodiversity duty are:

- The Council's strategy document Our Greenwich includes a biodiversity focused mission outcome: "The environment and biodiversity of Royal Greenwich is protected and enhanced"
- Included 'Nature and biodiversity' as one of seven strategic themes in its Parks and Open Spaces Strategy
- Maintained a Conservation Grass Programme on parks and cemeteries, and planted 5000 trees under its Carbon Neutral Action Plan
- Commissioned a review of Sites of Importance for Nature Conservation in 2024
- Commissioned a Strategic Biodiversity Assessment in 2024

3.37. In the next reporting period, the Council aims to comply with the biodiversity duty by:

- Completing the recruitment of a Biodiversity Officer to focus on managing the biodiversity delivery programme
- Maximising, recording and monitoring biodiversity net gain through the development management process
- Including biodiversity-focused policies in its emerging Local Plan, with reference to the London Nature Recovery Strategy
- Installing Leaky Dams in Oxleas Wood, Bostall Wood and Cloth Workers Wood as part of its flood risk management work
- Continuing biodiversity management on its parks and open spaces, including the conservation grassland management programme

## 4. Consideration of National Strategies

- 4.1. Royal Borough of Greenwich played an active role in the preparation of the Greater London Local Nature Recovery Strategy, including reviews of mapping, data sharing and responding to consultations. The Strategy was published in March 2026. The strategy is made up of three parts:
  - The Statement of Biodiversity Priorities, describing the existing natural environment of London, sets out principles and priorities for nature, identifies the actions needed to achieve them, and provides next steps for delivery
  - The Local Habitat Map, shows areas of particular importance for biodiversity, and areas that could become of particular importance for biodiversity, providing a spatial approach to identifying opportunities for habitat creation and enhancement
  - Annexes that describe the strategy area and list assemblages of species that need particular measures to benefit from habitat creation and enhancement (broken down by habitat type)
- 4.2. Local Planning Authorities must “have regard” to the contents of the Local Nature Recovery Strategy, requiring them to consider the opportunities identified in relation to their decisions and policy. Through Government policy and guidance, developers are encouraged to deliver measures set out in the Strategy.
- 4.3. The Environment Act grants Natural England statutory powers to convene local partnerships focused on addressing environmental issues that affect the conservation and management of protected sites, primarily Sites of Special Scientific Interest. There are no protected site strategies in effect within the Borough at present.
- 4.4. The Environment Act also grants Natural England statutory powers to develop strategies for improving the conservation status of any species of fauna or flora. There are no species conservation strategies in effect within the Borough at present.

# 5. Recommendations

- 5.1. The single most significant action that the Council could take to further benefit biodiversity would be to create direct and explicit responsibility for it within the governance structure, including both Councillor and Officer accountability, at an appropriate level so that the subject is considered in all relevant discussions. With the recruitment of a Biodiversity Officer, with this responsibility built into the job profile, this will be partly addressed.
- 5.2. Although their preparation has unfortunately coincided, the new Local Nature Recovery Strategy and the Local Plan should operate together to guide the assessment of the impacts of development and the quality and adequacy of proposed mitigation and compensation measures. Development impacts that would compromise the principles and priorities set out in the Local Nature Recovery Strategy should be challenged, and mitigation measures that are not aligned to the actions and measures should not be accepted.
- 5.3. The management of land by the Council, including areas of public realm land and all sites owned by the Council, should continue to be reviewed with the aim of accommodating and encouraging biodiversity. Management strategies for the maintenance and enhancement of Sites of Importance for Nature Conservation owned by the Council should be prepared, with reference to those species and habitats for which they have been designated. Continuity of management aimed at clearly stated objectives offers the best route to maximising benefits to biodiversity. Opportunities for the enhancement of habitats within all Council parks and open spaces should also be actively investigated and planned.
- 5.4. The Council should review internal policies and processes that could affect biodiversity, specifically those relating to the management of property and facilities, environmental permitting and events licensing, which have the most potential to affect biodiversity. At a basic level, this could mean developing or formalising a process for identifying and assessing the impacts of decisions on biodiversity, but this could be extended to include actively seeking opportunities for positive enhancement measures, which would be more in line with the biodiversity duty.
- 5.5. The Council could choose to positively promote the understanding of biodiversity to its residents and businesses, particularly in relation to the importance of parts of the Borough in local, national and international terms. This could be used to influence behaviour in sensitive locations, or to encourage local action for the enhancement of biodiversity in gardens or community spaces.

Table 1: Summary of Recommended Actions

|                 | Action                 | Requirement                                                                                            | Timescale |
|-----------------|------------------------|--------------------------------------------------------------------------------------------------------|-----------|
| <b>Action 1</b> | Clear governance       | Attribute accountability for the Biodiversity Duty to Members and Officers                             | Short     |
| <b>Action 2</b> | Development Management | Fully reflect the London Local Nature Recovery Strategy in policy and development management decisions | Short     |
| <b>Action 3</b> | Land management        | Review the management of Council land – especially SINCs – to maintain and enhance biodiversity        | Medium    |
| <b>Action 4</b> | Process review         | Incorporate consideration of biodiversity into all internal decision-making processes and practices    | Medium    |
| <b>Action 5</b> | Education              | Promote the understanding and appreciation of biodiversity to residents and businesses                 | Medium    |

## 6. Biodiversity Net Gain Information

- 6.1. The Council has not published any supplementary information in relation to biodiversity net gain, meaning that the processes to be followed and expectations of data required to be submitted with applications are as set out in the Government's Planning Practice Guidance<sup>3</sup>. The emerging Local Plan reinforces this approach.
- 6.2. The Council is using the Mycelia application to check submitted Metric calculations and to generate data for biodiversity net gain reporting. The Biodiversity Officer, when appointed, will be responsible for supporting the planning team to ensure that all Biodiversity Net Gain data is recorded accurately.
- 6.3. Data for the period covered by this report has been extracted from Mycelia via its reporting tool and is presented here.
- 6.4. The data that will make up the quantitative reporting includes:
  - Numbers of applications requiring biodiversity net gain (see below)
  - Numbers of biodiversity gain plans approved (see below), broken down by how net gain is secured (onsite, offsite, statutory credits)
  - Total baseline and post construction unit values, unit change and percentage change broken down by how net gain is secured
  - Impacts on irreplaceable habitat
  - Location of offsite net gain in relation to Local Planning Authority and National Character Area boundaries
  - Results of monitoring – meeting or failing to meet expectations
  - Total baseline and post construction unit values, and unit change broken down by habitat type – for habitat, hedgerows and watercourse units
- 6.5. Since the introduction of mandatory biodiversity net gain for most applications on 12th February 2024 – and subsequently for small sites on 2nd April 2024 – the Council has received 58 applications that required mandatory biodiversity net gain, of which eight used the Small Sites Metric. Within the reporting period, eight Biodiversity Gain Plans have been submitted and approved, with three being assessed at the time of writing. There have been no impacts on irreplaceable habitat.
- 6.6. Further detail is provided in the following tables.

<sup>3</sup> <https://www.gov.uk/guidance/biodiversity-net-gain>

Table 2 – Numbers of applications securing biodiversity net gain by on-site and off-site units and statutory credits

| Category                                                                                                                                                     | Number of applications | Percentage of applications |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|----------------------------|
| Total number of biodiversity gain plans approved in the reporting period securing BNG through on-site units only                                             | 6                      | 75.00                      |
| Development Management Total number of biodiversity gain plans approved in the reporting period securing BNG through off-site units only                     | 0                      | 0.00                       |
| Total number of biodiversity gain plans approved in the reporting period securing BNG through statutory credits only                                         | 0                      | 0.00                       |
| Total number of biodiversity gain plans approved in the reporting period securing BNG through a combination of on-site and off-site units                    | 1                      | 12.50                      |
| Total number of biodiversity gain plans approved in the reporting period securing BNG through a combination of on-site units and statutory credits           | 1                      | 12.50                      |
| Total number of biodiversity gain plans approved in the reporting period securing BNG through a combination of off-site units and statutory credits          | 0                      | 0.00                       |
| Total number of biodiversity gain plans approved in the reporting period securing BNG through a combination of on-site, off-site units and statutory credits | 0                      | 0.00                       |

Table 3 – Overall expected gains and losses across all biodiversity gain plans approved in the reporting period

| Overall expected gains and losses                                                                                | Area habitat | Hedgerow | Watercourse |
|------------------------------------------------------------------------------------------------------------------|--------------|----------|-------------|
| Total number of biodiversity gain plans approved in the reporting period securing BNG through on-site units only | 39.83        | 2.94     | 1.00        |
| Total number of post-development biodiversity units approved on-site                                             | 43.22        | 5.00     | 1.15        |
| Total net unit change in biodiversity units, on-site                                                             | 3.39         | 2.06     | 0.15        |
| Average percentage (%) change in biodiversity units, on-site                                                     | 8.51         | 69.85    | 14.94       |
| Total number of baseline biodiversity units approved off-site                                                    | 0.63         | 0.00     | 0.00        |
| Total number of post-intervention biodiversity units approved off-site                                           | 3.08         | 0.00     | 0.00        |
| Total net unit change in biodiversity units, off-site                                                            | 2.45         | 0.00     | 0.00        |
| Average percentage (%) change in biodiversity units, off-site                                                    | 388.18       | 0.00     | 0.00        |
| Total number of biodiversity units offset using statutory credits                                                | 0.11         | 0.00     | 0.00        |
| Total net unit change in biodiversity units (including any units offset using credits)                           | 5.95         | 2.06     | 0.15        |
| Average percentage (%) change (including statutory credits)                                                      | 14.70        | 69.85    | 14.94       |

Table 4 - Location of off-site biodiversity units

| Location of off-site biodiversity units                                                                         | Total | Proportion (%) |
|-----------------------------------------------------------------------------------------------------------------|-------|----------------|
| Number of off-site biodiversity units located inside LPA boundary or NCA of impact site                         | 0.00  | 0.00           |
| Number of off-site biodiversity units located outside LPA or NCA of impact site, but in neighbouring LPA or NCA | 3.08  | 100.00         |
| Number of off-site biodiversity units located outside of LPA or NCA of impact site and neighbouring LPA or NCA  | 0.00  | 0.00           |

Table 5 - Composition of biodiversity gains – areas (zero value lines removed)

| Habitat Type            | Total biodiversity units at baseline | Total hectares at baseline | Total biodiversity units post - development | Total hectares post - development | Net change in biodiversity units | Net change in hectares |
|-------------------------|--------------------------------------|----------------------------|---------------------------------------------|-----------------------------------|----------------------------------|------------------------|
| Cropland                | 0.63                                 | 0.32                       | 0.00                                        | 0.00                              | -0.63                            | -0.32                  |
| Grassland               | 9.00                                 | 3.88                       | 12.96                                       | 3.08                              | 3.96                             | -0.80                  |
| Heathland and shrub     | 0.29                                 | 0.06                       | 0.41                                        | 0.08                              | 0.12                             | 0.02                   |
| Sparsely vegetated land | 0.41                                 | 0.16                       | 0.30                                        | 0.08                              | -0.10                            | -0.08                  |
| Urban                   | 0.90                                 | 6.10                       | 2.70                                        | 7.33                              | 1.81                             | 1.23                   |
| Woodland and forest     | 0.04                                 | 0.01                       | 0.04                                        | 0.01                              | 0.00                             | 0.00                   |
| Watercourse footprint   | Not applicable                       | 0.00                       | Not applicable                              | 0.00                              | Not applicable                   | 0.00                   |
| Individual trees        | 29.19                                | 2.86                       | 29.87                                       | 3.56                              | 0.68                             | 0.71                   |
| <b>Total</b>            | <b>40.46</b>                         | <b>13.38</b>               | <b>0.00</b>                                 | <b>14.14</b>                      | <b>5.83</b>                      | <b>0.75</b>            |

Table 6 - Composition of biodiversity gains - hedgerows and lines of trees (zero value lines removed)

| Habitat Type                                                 | Total biodiversity units at baseline | Total kilometres at baseline | Total biodiversity units post - development | Total kilometres post - development | Net change in biodiversity units | Net change in kilometres |
|--------------------------------------------------------------|--------------------------------------|------------------------------|---------------------------------------------|-------------------------------------|----------------------------------|--------------------------|
| Species-rich native hedgerow with trees                      | 1.61                                 | 0.12                         | 2.31                                        | 0.12                                | 0.70                             | 0.00                     |
| Species-rich native hedgerow - associated with bank or ditch | 0.72                                 | 0.11                         | 0.72                                        | 0.11                                | 0.00                             | 0.00                     |
| Species-rich native hedgerow                                 | 0.00                                 | 0.00                         | 1.09                                        | 0.13                                | 1.09                             | 0.13                     |
| Native hedgerow with trees                                   | 0.00                                 | 0.00                         | 0.54                                        | 0.14                                | 0.54                             | 0.14                     |
| Line of trees                                                | 0.00                                 | 0.00                         | 0.08                                        | 0.05                                | 0.08                             | 0.05                     |
| Non-native and ornamental hedgerow                           | 0.60                                 | 0.59                         | 0.24                                        | 0.24                                | -0.36                            | -0.35                    |
| <b>Total</b>                                                 | <b>2.94</b>                          | <b>0.81</b>                  | <b>5.00</b>                                 | <b>0.77</b>                         | <b>2.06</b>                      | <b>-0.03</b>             |

Table 7 - Composition of biodiversity gains – watercourses (zero value liens removed)

| Habitat Type | Total biodiversity units at baseline | Total kilometres at baseline | Total biodiversity units post - development | Total kilometres post - development | Net change in biodiversity units | Net change in kilometres |
|--------------|--------------------------------------|------------------------------|---------------------------------------------|-------------------------------------|----------------------------------|--------------------------|
| Ditches      | 1.00                                 | 0.25                         | 1.15                                        | 0.25                                | 0.15                             | 0.00                     |
| <b>Total</b> | <b>1.00</b>                          | <b>0.25</b>                  | <b>1.15</b>                                 | <b>0.25</b>                         | <b>0.15</b>                      | 0.00                     |

- 6.7. The Council will need to monitor any biodiversity net gain secured onsite by planning obligation or delivered offsite by a third-party habitat bank secured by a Section 106 agreement with the Council. Monitoring intervals and methodologies should be specified within habitat management plans and the responsibility for the field work will be on the body delivering the habitat management. The Council will be expected to be satisfied that the predicted gains are being achieved and carry out enforcement where they are not.



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