

## THE NEED FOR A BIODIVERSITY POLICY

Private gardens are critical to biodiversity and green infrastructure in the Redington Frogal Area. Individually, private gardens act as ecological stepping stones and, in tandem, form an ecological network providing the green Infrastructure of the Redington Frogal Area.

The Frogal and Fitzjohn's ward has declared its support of the London National Park City movement<sup>1</sup>, whose status was formally confirmed in summer 2019. To coincide with the launch, the Neighbourhood Plan seeks to halt the unsustainable cumulative loss of soft surface, trees and hedges, and an attendant loss of biodiversity and green infrastructure, over the last 30 years.

Losses to biodiversity (e.g. sparrows, bats, butterflies and thrushes) have occurred as a result of garden and habitat loss due to new development, including building extensions into rear and side gardens; conversion of traditional front gardens to hard-surfaced off-street car parks; and basement developments incorporating light wells. This is despite the area's designation as a Conservation Area and its aim to preserve or enhance the character of the Area.

If we value the morning chorus, the contribution of gardens to the streetscapes, the rich and varied tree canopies, then we need a firm but reasonable framework which gives clear guidance about what we, the residents, consider to be acceptable.

Estimates for United Kingdom cities suggest that domestic gardens comprise 19-27% of the entire urban area. A study of five UK cities showed that domestic gardens covered more than 20% of the urban area, and ranging from 35% in Edinburgh to 47% in Leicester<sup>2</sup>. In London, 37,900 hectares (ha), approximately 24% of the city, is comprised of private, domestic garden. Of that garden land, 57% or 22,000 ha is vegetated cover (lawn, tree canopy and other vegetation). Therefore, approximately 14% of London is garden greenspace<sup>3</sup>.

Urban green spaces, such as domestic gardens, are becoming increasingly important refuges for native biodiversity<sup>4</sup>, and play an important part in maintaining biodiversity in urban areas. Available evidence suggests that domestic gardens offer an extensive, unique and undervalued resource for enhancing urban biodiversity<sup>5</sup>. In particular gardens play an important role in supporting diverse wildlife populations. However, the benefit to wildlife will depend on the composition of the garden, such as differing landcovers e.g. grass lawn, paved patio, cultivated flower beds, etc<sup>6</sup>.

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<sup>1</sup> Frogal & Fitzjohn's support – London National Park City.pdf

<sup>2</sup> “*Urban domestic gardens (IV): the extent of the resource and its associated features*”, by Kevin J. Gaston, Philip H. Warren, Ken Thompson and Richard M. Smith , 2004  
<http://www.bugs.group.shef.ac.uk/BUGS1/sources/bugs-reprint4.pdf>

<sup>3</sup> “*Blooming London*” by Chloe Smith, Greenspace Information for Greater London, July 2011  
<http://www.gigl.org.uk/blooming-london/>

<sup>4</sup> “*Scaling up from gardens: biodiversity conservation in urban environments*” by Mark A. Goddard, Andrew J. Dougill and Tim G. Benton, February 2010  
<http://homepages.see.leeds.ac.uk/~lecajd/papers/Goddardetal.TREE.pdf>

<sup>5</sup> “*Scaling up from gardens: biodiversity conservation in urban environments*” by Mark A. Goddard, Andrew J. Dougill and Tim G. Benton, February 2010  
<http://homepages.see.leeds.ac.uk/~lecajd/papers/Goddardetal.TREE.pdf>

<sup>6</sup> “*Urban domestic gardens (IX): Composition and richness of the vascular plant flora, and implications for native biodiversity*” by R.M. Smith, K. Thompson, J.G. Hodgson, P.H. Warren and K.J. Gaston, 2005  
<http://www.bugs.group.shef.ac.uk/BUGS1/sources/bugs-reprint9.pdf>

A study of 61 gardens in Sheffield, UK, showed that garden size plays an overwhelming role in determining garden composition: larger gardens support more landcovers, contained greater extents of three-quarters of the recorded landcovers, and were more likely to contain trees taller than 2 metres. All categories of vegetation canopy increased with garden size, and large gardens supported disproportionately greater cover above 3 metres, thus contributing more to ecosystem services. Garden area partly determines the availability of particular landcovers and thus the presence of potential habitat for wildlife<sup>7</sup>.

In evidence to the London Assembly Planning Committee of March 2018<sup>8</sup>, it was noted that greater protection is required for, “Green spaces, including small open spaces, pocket parks and gardens” (para. 9.11); protection against extension (para. 9.15) and the harmful effect on biodiversity due to loss of gardens (para. 9.18):

*“In support of this concern, the Planning Committee heard from the London Wildlife Trust that further loss of gardens would have a negative effect on biodiversity. The same meeting heard that there was a lack of biodiversity expertise in the planning process at the local level, with 18 per cent of applications impacting biodiversity, but only one per cent being scrutinised for those impacts.”*

The National Planning Policy Framework requires local authorities to take a strategic approach to biodiversity, to “plan for biodiversity at a landscape-scale across local authority boundaries; identify and map components of the local ecological networks... ; promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations...”

Biodiversity 2020: A strategy for England’s wildlife and ecosystems services, details a strategy for delivering the Government’s natural environment policy. It includes a commitment to “...take a strategic approach to planning for nature” via reform of the planning system whilst still retaining “...the protection and improvement of the natural environment as core objectives of the planning system.” Biodiversity 2020 also features a number of Priority Actions, including to “establish more coherent and resilient ecological networks on land that safeguards ecosystem services for the benefit of wildlife and people”.

In oral evidence provided on 16 January 2018 (QQ 197-208) to the Select Committee on the Natural Environment and Rural Communities Act, the Rt. Hon. Michael Gove MP stated that,

*“As you quite rightly point out, one of the striking things is that domestic gardens are some of the richest sources of biodiversity in the country. When thinking about how we meet housing need, we must be clear that it must not come at the cost of biodiversity loss.”*<sup>9</sup>

Moreover, the Revised NPPF, updated February 2019<sup>10</sup>, states that,

Para. 70: “Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

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<sup>7</sup> “Urban domestic gardens (IX): Composition and richness of the vascular plant flora, and implications for native biodiversity” by R.M. Smith, K. Thompson, J.G. Hodgson, P.H. Warren and K.J. Gaston, 2005 <http://www.bugs.group.shef.ac.uk/BUGS1/sources/bugs-reprint9.pdf>

<sup>8</sup> London Assembly Planning Committee *London Plan consultation response*, March 2018 [https://www.london.gov.uk/sites/default/files/london\\_assembly\\_response\\_to\\_london\\_plan.pdf](https://www.london.gov.uk/sites/default/files/london_assembly_response_to_london_plan.pdf)

<sup>9</sup> House of Lords Select Committee on NERC 2006 – written and oral evidence <http://www.parliament.uk/documents/lords-committees/NERC-Act-2006/Combined-evidence-volume-nerc.pdf>

<sup>10</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

Para. 122: “Planning policies and decisions should support development that makes efficient use of land, taking into account:”

*“d) the desirability of maintaining an area’s prevailing character (including residential gardens), or of promoting regeneration and change.”*

The benefits of restoring ecosystem services in urban areas are recognised in scientific research<sup>11</sup> and the London Environment Strategy (May 2018) acknowledges that “living in greener neighbourhoods can have a big impact on people’s health and quality of life, and on how attractive a place London is in which to live, visit and do business.”

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<sup>11</sup> “Benefits of restoring ecosystem services in urban areas”, T Emqvist, H Setälä, SN Handel, S van der Ploeg, J Aronson, JN Blignaut, E Gómez-Baggethun, DJ Nowak, J Kronenberg and R de Groot

## REDINGTON FROGNAL ECOLOGICAL NETWORK

Adjoining rear gardens with trees and hedges in the Plan area form particularly diverse and important habitat network, both at ground level and above, enabling wildlife to circulate and providing a refuge. Together, they form Core Sustenance Zones<sup>12</sup> for bats, birds and other wildlife species. The presence of bats throughout the area is confirmed by a number of bat surveys conducted by The Ecology Network<sup>13</sup>, The Ecology Consultancy<sup>14, 15</sup>, Furesfen<sup>16</sup> and John Cromar's arboricultural report<sup>17</sup>. In particular, adjoining rear gardens provide links to Hampstead Heath (Metropolitan Site of Interest for Nature Conservation M072), Hampstead Cemetery (CaB101) and Camden's Strategic Green Corridors, notably to the Nash Ramblas Link and the Hampstead Ridge Corridor, to the CaL07 Site of Interest for Nature Conservation, to Golders Hill Park and to Regent's Park.

**Photo BGI 1: Rear Garden Corridor Between Hollycroft Avenue, Ferncroft Avenue and Platts Lane, Sub Area 2**



Hedges are also of particular importance to the Redington Froggnal ecological network: they create cool, shady places in what might otherwise be hot, exposed sites, with mixed hedgerows providing food, nesting places and shelter for birds and mammals. Wild flowers can provide both ornamental value and value to biodiversity, by supporting bees and other insects.

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<sup>12</sup> *Spaces Wild*, London Wildlife Trust, October 2015

<sup>13</sup> Ecology Network Bat Activity Survey, September 2016

<sup>14</sup> Ecology Consultancy *Kidderpore Avenue Bat Surveys*, December 2012

<sup>15</sup> Ecology Consultancy *Kidderpore Avenue King's College Halls, Bat Presence or Likely Absence Surveys*, September 2014

<sup>16</sup> Furesfen *25B Froggnal Bat Survey*, July 2012

<sup>17</sup> Arboricultural report for 5 Templewood Avenue, 24.1.17

## REDINGTON FROGNAL AS A LOCAL ECOLOGICAL NETWORK

An ecological network is a group of habitat patches that species can move easily between, maintaining ecological function and conserving biodiversity. Through appropriate management, ecological networks can provide a connected collection of refuges for wildlife. These networks form the basic natural infrastructure that will begin to enable biodiversity to recover from recent declines, and help to protect socially and economically important ecosystem goods and services

Planning Practice Guidance on the Natural Environment, 2014 (Para 009 Reference ID: 12- 009-20140306) states that ecological network mapping should include green space within built areas.

See: <https://www.gov.uk/guidance/natural-environment>

Habitat maps BGI 1 and BGI 2 below, provided by Greenspace Information for Greater London (GiGL), show the connectivity of Redington Frognal gardens to areas such as Regent's Park and Hampstead Heath (whose dark green shading is due to its ancient woodland, swamps and open meadows) and their value in aggregate as an ecological network, while Map BGI 3 demonstrates their importance to the survival of bats in the area.

The maps below are based on an examination by hexagon of the percentages of green cover and hard surface. They show the higher ecological value of Redington Frognal gardens and their importance as stepping stone, linking to Hampstead Heath to the north east and Hampstead Cemetery to the west. It should be noted, however, that the habitat scores accorded to Redington Frognal gardens do not take account of the 55 veteran English oak trees (including those with developing veteran features) within the neighbourhood plan area, which are visible from the public realm, as set out in map BGI 4 and table BGI 1.

The area also includes a very large number of veteran plane trees planted when the roads were laid out at the turn of the 20<sup>th</sup> century. The remaining veteran plane trees are shown in map BGI 5. Together with other veteran trees, they support a high number of briophytes and other mosses, providing important habitat for a variety of invertebrates.

By taking into account the very high ecological value of these veterans, the scoring (the depth of the green colour) would significantly increase.

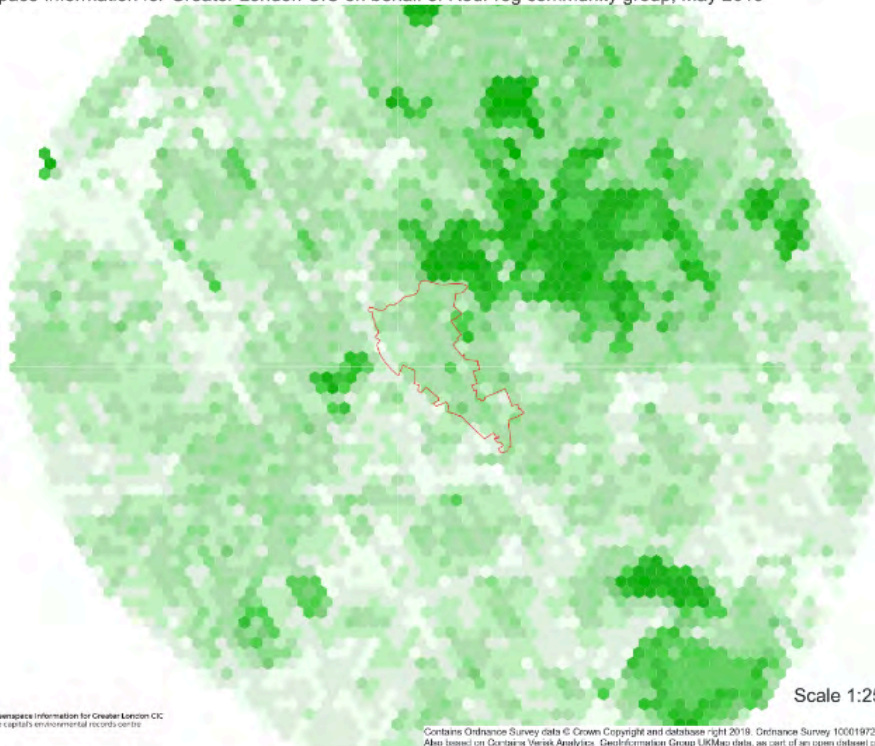
## Map BGI 1: Connectivity of the Redington Froggal Ecological Network

### RedFrog area habitat network - with context

Produced by Greenspace Information for Greater London CIC on behalf of RedFrog community group, May 2019



Habitat scores are calculated as habitat value x habitat area for each 100m hexagon.



Scale 1:25000 at A3  
Contains Ordnance Survey data © Crown Copyright and database right 2018. Ordnance Survey 100019728.  
Also based on Corine Land Use data, as part of an open dataset published by the GLA

The value of the Area's green habitat network is being compromised by planning consents for rear garden buildings, property extensions and basements, which almost invariably lead to hedge and tree fellings, including important mature trees<sup>18</sup>.

The permission granted for planning application 2015/3936/P to provide for a double-storey underground car park, building extensions and new buildings at the former King's College campus SINC CaB1109, has had a profound impact on the north side of Kidderpore Avenue. It led to the felling of 36 mature trees, the disappearance of 103 square metres of native woodland and 80 square metres of tall herbs, and a 130% increase in the area of bare artificial habitat (from 968 square metres to 2,225 squaremetres)<sup>19</sup>.

This is in addition to the felling of up to 60 trees at the King's College south site in Kidderpore Avenue for the Barratt development (which includes building refurbishments, extensions and some replacement buildings). The Ecology Consultancy planting plans<sup>20, 21</sup>, which had been drawn up for the purpose of securing planning consent, were not implemented. Instead, the Phase 1 Habitat Survey Map, shown in Figure 1 of The Ecology Consultancy report, has been primarily replaced by hard surface and car parking.

<sup>18</sup> Email from Janet Gompertz, 29.10.17 and planning objection from Linda Robson

<sup>19</sup> The Ecology Consultancy response to questions raised by community groups, dated 13.6.2017

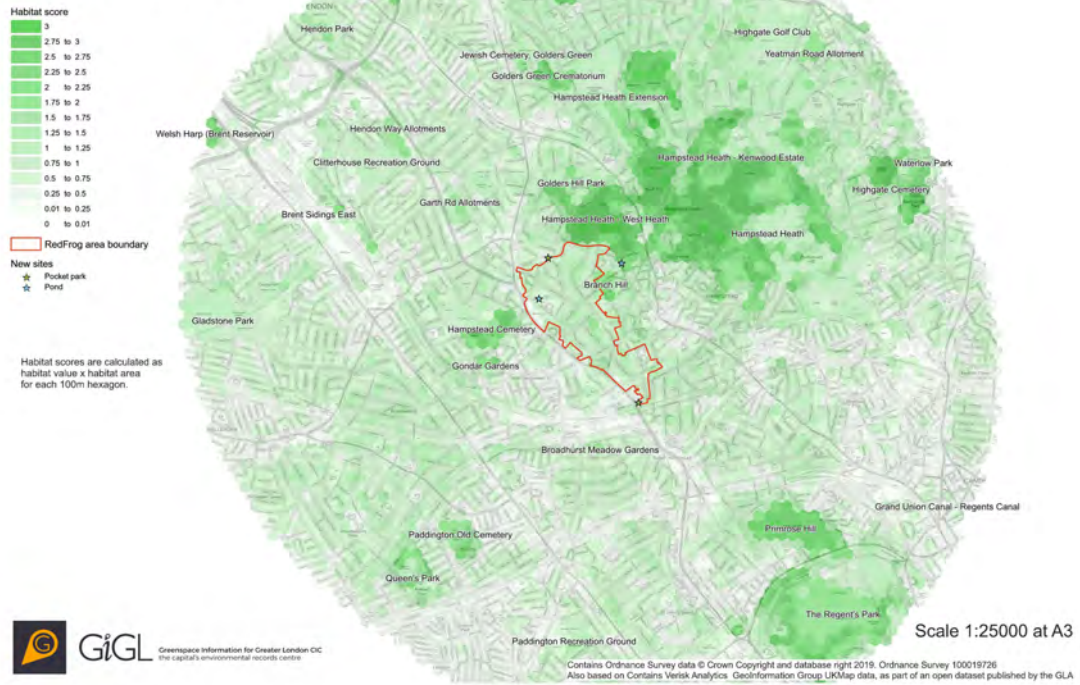
<sup>20</sup> Guidance Notes to Developers: Recommended Planting Plan, Phase I Habitat Survey, by The Ecology Consultancy 13.12.12

<sup>21</sup> Murdoch and Wickham Planting Plan, 30.1.15

## Map BGI 2: Redington Froggnal Ecological Network with Place Names

### RedFrog area habitat network - with context

Produced by Greenspace Information for Greater London CIC on behalf of RedFrog community group, May 2019



## Map BGI 3: Importance of the Redington Froggnal Ecological Network for Bats

### Bats

Produced by Greenspace Information for Greater London CIC on behalf of RedFrog community group, May 2019



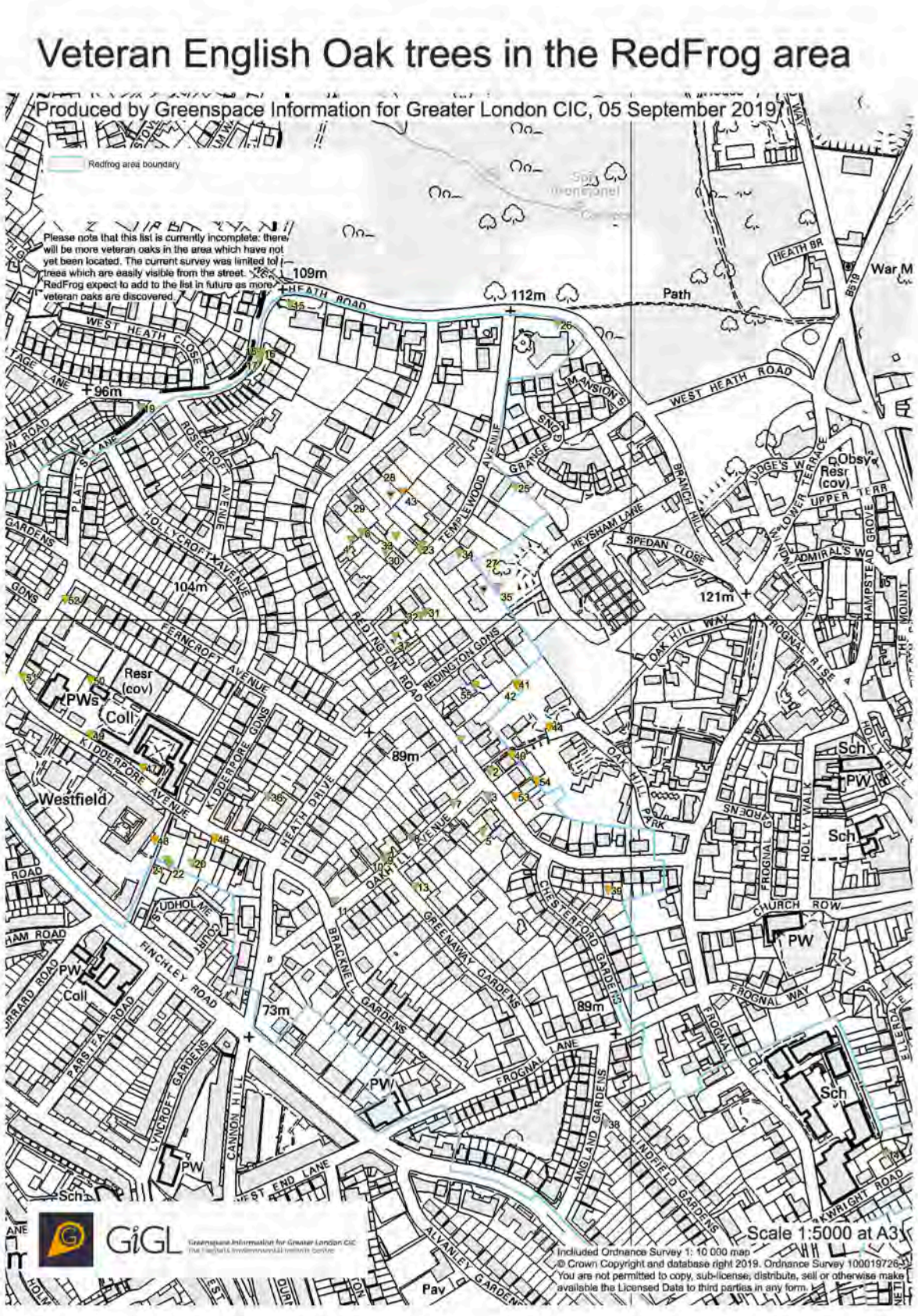
#### Map BGI 4: Some Veteran English Oak Trees in the Redington Frogna! Area

Map ID number	Address	Location note
1	28 Redington Road, NW3 7RB	Listed as "rear" garden, but actually front garden
2	22 Redington Road, NW3 7RG	Listed as "rear" garden, but actually front garden
3	37A Redington Road, NW3 7QY	front garden
4	52 Redington Road, NW3 7RS	side garden, bordering no. 50
5	33-35 Redington Road, NW3 7QY	Moved to 35 rear garden based on co-ordinates
6	54 Redington Road NW3 7RS	side garden, bordering no. 50
7	2A Oakhill Avenue, NW3 7RE	Street tree
8	8 Oakhill Avenue, NW3 7RE	front garden
9	10 Oakhill Avenue, NW3 7RE	front garden
10	10A Oakhill Avenue, NW3 7RE	front garden
11	14 Oakhill Avenue, NW3 7RE	front garden, corner Bracknell Gardens
13	Greenaway Gardens	opposite 11 Oakhill Avenue
14	14 Arkwright Road, NW3 6BG	rear garden
15	Sarum Chase, 23 West Heath Road, NW3 7UU	front garden
16	Telegraph Hill, Platts Lane, NW3 7NU	embankment between Telegraph Hill and Platts Lane
17	Telegraph Hill, Platts Lane, NW3 7NU	embankment between Telegraph Hill and Platts Lane
18	Telegraph Hill, Platts Lane, NW3 7NU	embankment between Telegraph Hill and Platts Lane
19	85 Platts Lane, NW3 7NL	front garden
20	7 Kidderpore Avenue, NW3 7SX	rear garden
21	9 Kidderpore Avenue, NW3 7SX	rear garden
22	9 Kidderpore Avenue, NW3 7SX	rear garden
23	5 Templewood Avenue, NW3 7UY	front garden
24	5A Templewood Avenue, NW3 7UY	front garden
25	14 Templewood Avenue, NW3 7XA	rear garden behind garage
26	18 Templewood Avenue, NW3 7XD	behind Grange Gardens
27	1 Templewood Gardens, NW3 7XB	rear garden
28	60 Redington Road	
29	56 Redington Road	
30	1 Templewood Avenue	
31	2A Templewood Avenue	
32	2 Templewood Avenue	
33	5 Templewood Avenue	
34	8 Templewood Avenue	
35	Public garden behind 1 Templewood Gardens	
36	10-11 Heath Drive	Back garden adjoining Kidderpore Gardens
37	42 Redington Road	
38	27 Lindfield Gardens	
39	14 Redington Road	Rear garden
40	22 Redington Rd	Pruned veteran oak in front garden
41	28 Redington Road:	Veteran oak in rear garden
42	28 Redington Road: 2 veteran oaks in rear garden	Veteran oak in rear garden
43	Boundary of 60 and 62 Redington Road (probably in garden of 62) at 51.560334, -0.187949	Visible from rear of driveway between 3 and 5 Templewood Avenue
44	Oak Hill House, NW3 7LP	Veteran oak in rear garden 51.557616, -0.185368
46	3 Kidderpore Avenue	Ivy-covered heavily pruned oak in front garden (adjoining no. 5)
47	Skeel Library (Hampstead Manor), NW3 7ST	Oak with developing veteran features in front garden 51.557264 -0.192826
48	Westfield, 15 Kidderpore Avenue, NW3 7SJ / 7SF	Veteran oak in back garden on boundary with Croft Way 51.556437, -0.192644
49	Hampstead Manor, Kidderpore Avenue:	Front garden bordering St. Luke's Vicarage, 51.557659, -0.193774
50	Behind Chapel at Hampstead Manor, Kidderpore Avenue	51.558514, -0.193824 (viewed from Kidderpore Reservoir / Windsor Court tennis courts)
51	8 Platt's Lane, facing Kidderpore Avenue	Side garden, 51.558334, -0.195064
52	1 Ferncroft Avenue, bordering Platt's Lane	Back garden, 51.559468, -0.193958
53	20 Redington Rd	rear garden
54	20 Redington Rd	front garden
55	17 Redington Gardens.	rear garden of house set furthest back from the road

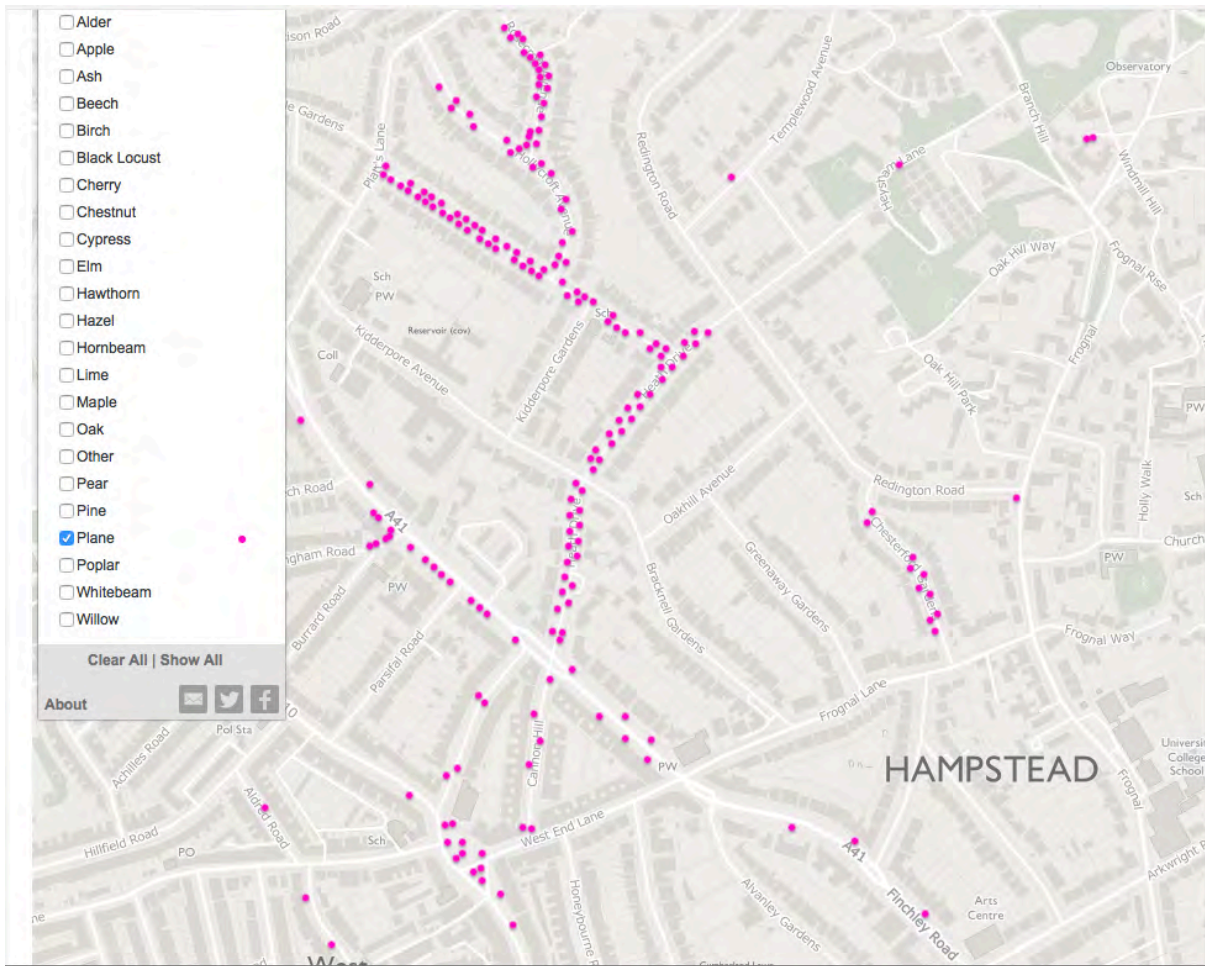
Source: Redington Frogna! research



Map BGI 4: Some Veteran English Oak Trees in the Redington Frogna Area



## Map BGI 5 Local Authority Maintained Veteran Plane Trees in the Redington Frogna Area



Note: a few of these will have been planted more recently, but the vast majority will be more than 100 years old.

Source: London Tree Map, GLA

<https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/trees-and-woodlands/london-tree-map>