

26th September 2016

THE LAND TRUST'S RESPONSE TO THE LONDON ASSEMBLY'S INQUIRY INTO ENCOURAGING BIODIVERSITY IN NEW HOUSING DEVELOPMENTS

Introduction to the Land Trust and reasons for responding

The Land Trust welcomes the opportunity to respond to the London Assembly's inquiry into encouraging biodiversity in new housing developments.

In the first instance, to put our response into context, the Land Trust is the national land management charity that secures long term investment for managing green spaces in perpetuity, enabling us to provide high quality and sustainably managed green spaces that deliver environmental, economic and social benefits. We have ownership and/or long term management responsibility for over 2,000 hectares of land covering more than 60 sites across England, and continue to grow.

A number of the green spaces we manage are in partnership with residential and commercial developers, where we have provided the long term financial solutions to managing the green infrastructure and spaces in and around their new developments, to improve the quality of the place for people and for biodiversity, running programs of activities to ensure biodiversity and habitats are created, improved and enhanced whilst connecting people with nature and creating community cohesion.

Our vision is to improve the quality of people's lives by creating sustainable, high quality green spaces that deliver economic, environmental, educational, health and social benefits in local communities.

We also have a number of green spaces within Greater London, as such, we have experience of working with developers and the public sector within region. Therefore, we feel that we are in a strong position to be able to put forward our views in response to this inquiry.

Further details can be found at www.thelandtrust.org.uk

Consultation Questions

1. Why is it important to encourage biodiversity in new housing developments?

There are multiple reasons why it is important to encourage biodiversity into new housing developments.

Firstly, biodiversity (and the habitats and natural environment they need to survive) perform a number of functions when they are healthy:

1. Provide goods and services that we need to exist (such as helping produce food through pollination)
2. Maintain ecological functions (have resilient systems to help fight diseases and combat the impacts of climate change, such as improved air quality and reduced flooding)
3. Offer intrinsic values, cultural values and moral values to people

Secondly, biodiversity and natural environments help contribute towards the health and wellbeing of communities. Nature provides focal points for people to come together; helping people improve their physical and mental health, providing educational opportunities and boosts local economies, making areas more attractive and desirable. Significant research now exists, demonstrating the benefits and values of nature on society and the economy, such as our recent Social value study of our own green spaces¹. Some key statistics are included here:

- More than a third use our green spaces to engage with wildlife and nature
- 30% use our spaces for peace and quiet
- 25% of respondents use our green spaces to relieve stress
- 90% feel that our green spaces play a positive part in their happiness and wellbeing

Furthermore, our research demonstrates that people using our green spaces have higher levels of satisfaction and wellbeing and lower levels of anxiety compared to the national averages.²

Other research also demonstrates the health benefits of green space (including biodiversity):

- Those who live within 500m of accessible green space are 24% more likely to meet recommended levels of physical exercise (Defra 2015)³
- Just five minutes of exercise in a "green space" such as a park can boost mental health (University of Essex)⁴

Thirdly, just as people need infrastructure to move from one point to the next, biodiversity also

¹ <http://thelandtrust.org.uk/wp-content/uploads/2016/01/The-Value-of-our-Green-Spaces-January-2016.pdf>

² <http://thelandtrust.org.uk/wp-content/uploads/2016/01/The-Value-of-our-Green-Spaces-January-2016.pdf>

³ www.gov.uk/government/uploads/system/uploads/attachment_data/file/396840/pb13897-nature-do-for-you.pdf

⁴ www.news.bbc.co.uk/1/hi/health/8654350.stm

needs robust infrastructure in the form of natural corridors in order to travel and connect. It is now established through research that once sites become isolated from each other, biodiversity (or natural capital) is reduced significantly over time. A single factor, such as a road subdividing an area can cause a reduction in biodiversity, even where greenspace exists on both sides of the highway.

As a result of increased urban development and expanding built environments, wildlife has suffered; habitats have been lost or severely reduced, resulting in detrimental impacts on biodiversity. The latest State of Nature report published September 2016 shows just how much our biodiversity is in trouble, with 1 in 10 species at risk of disappearing⁵.

If developers embedded green infrastructure into their new housing plans (along with the strategies in place for long term investment of their maintenance) natural corridors could be created and sustained, enabling wildlife to travel fluidly from one habitat to the next, helping biodiversity to become more resilient.

There are also significant financial benefits for embedding more nature into our developments.

Biodiversity and nature can alleviate financial pressure on multiple public services. For example, green Infrastructure helps combat mild and moderate depression and can be more cost-effective than traditional treatments. This could help Wales save the £16m it spends on the 3.8m anti-depressant prescriptions issued per year (Wildlife Trust Wales 2016)⁶

As our study demonstrates, 90% of survey respondents said that our green spaces help make the local area more desirable, which leads to economic uplift.⁷

Property prices can increase as well – Greenwich Peninsula Ecology Park is bordered by new apartment blocks overlooking this new habitat and there has been significant uplift in values. However even less prosperous regions can benefit - a recent UK study shows that green infrastructure can contribute up to 34% uplift in property values (Wildlife Trusts Wales 2016)⁸.

2. How rigorously is biodiversity considered in planning applications and agreements?

In our view, it is not considered.

There are some guidelines in the National Planning Policy Framework on green infrastructure and embedding it into developments, however, this is not high up on the priorities and unfortunately, is often an afterthought.

⁵ <https://ww2.rspb.org.uk/whatwedo/stateofnature2016>

⁶ www.wtwales.org/sites/default/files/green_infrastructure.pdf

⁷ <http://thelandtrust.org.uk/wp-content/uploads/2016/01/The-Value-of-our-Green-Spaces-January-2016.pdf>

⁸ www.wtwales.org/sites/default/files/green_infrastructure.pdf

It is often only when local planning authorities have environment strategies or land use strategies in place that green infrastructure is seen as a part of new developments, but overall, green infrastructure is not placed high on the priority list.

As a result, biodiversity is even lower down the priority list.

In some cases, planning permission for new developments is granted with planning conditions attached, requiring the developer to contribute to a local improvement, such as through Section 106. However, this is not always nature / natural environment related.

Unless a developer has a particular interest in biodiversity, sees the value of incorporating nature into the designs and sees the CSR benefits and chooses to do this, it is often not considered, or seen as a costly addition, rather than a valuable inclusion.

For example, developer, Countryside, who are working with the Land Trust in Essex, recognises the benefits of embedding nature into its developments.⁹ Those developers working with the Land Trust now see the positive impact on their brand by association and so appreciate that embedding nature at the start can actually lead to better profile of sustainability and in turn uptake of completed schemes.

3. To what extent and how effectively are ecological mitigation measures implemented in completed housing developments?

Some of the only ecological mitigation measures implemented into housing developments seem to be Sustainable Urban Drainage Systems (SUDS), which help with water storage and reduce flood risk. However, other aspects are minimal.

The pressure to increase housebuilding is at its greatest since the 1950s and even the major private sector providers cannot deliver the numbers required. The trend is for smaller builders to be encouraged to take up the opportunities to become engaged, such as with public sector land development, yet these are the organisations that are vulnerable to slight changes in risk from cost uplift, for example, so they will be less incentivised to embed sustainability principles, such as biodiversity into smaller schemes.

There are so many opportunities and benefits arising from maximising the amount of green infrastructure and biodiversity within new housing developments, but since there is not much requirement, this is often not considered and then only as an afterthought or as an add-on.

Furthermore, since it is much easier to incorporate into new developments than existing ones, it is a considerable missed opportunity to not do this.

⁹ <http://www.countryside-properties.com/media-centre/news-archive/2016/march/creating-outdoor-spaces-for-better-health-by-andrew-carrington/>

As explained above, the advantages of incorporating nature into developments are endless, and have multiple positive economic and social outcomes as well.

4. What are the strengths and weaknesses of the London Plan (and other Mayoral) guidance on protecting, maintaining and enhancing biodiversity? How well does the guidance encourage opportunities for *more* biodiversity?

The London Plan Policy 7.19 Biodiversity and Access to Nature references biodiversity as a key factor to be applied across a range of policies in the plan, including for large housing schemes. Yet in these individual policies, the references to biodiversity are missing, which means that nature is always seen as an optional extra unless it is forced upon development as a mitigation requirement.

Supporting text to this policy notes: “Development proposals should begin by understanding their wider context and viewing promotion of nature conservation as integral to the scheme not as an ‘add-on’”.

It refers to the direct and indirect impacts on nature arising from development and states access to nature can be an important contributor to people’s health. It adds “the Mayor wants to see better access to both existing and new wildlife habitats and has identified priorities to redress areas of deficiency”. Again these words do not specify targets or what success looks like and priorities tend to focus on the strategic levels of planning.

Green Infrastructure which includes biodiversity considerations is referenced in policy 2.18 but here again policy tends to move rapidly to the strategic level and does not address specific matters concerning biodiversity, within new housing areas for example.

In the Mayor’s new Housing Zones, the focus is on delivering larger numbers of homes rather than greenspace and place making and there is no direction given on how biodiversity elements are to be enhanced. It is known that brownfield land is often rich in biodiversity and so there will be a real risk to biodiversity in the new Housing Zones unless specific measures are incorporated, and their positive effects monitored. Emphasising impacts and mitigation tell only part of the story. Nature should not be an add-on in the Housing Zones.

Invertebrate experts, Buglife put forward examples and useful information in a report about understanding the value of brownfield.¹⁰ Further to this, jointly, with Buglife, we have expressed our views protecting biodiversity-rich brownfield land, using our site, Canvey Wick in Essex as an example.¹¹

The current push for new housing does not reflect the growth of London’s population by 3 million over the next couple of decades. This needs more greenspace not less (see the Mayor’s Green Infrastructure Task Force Report¹²) in association often with densification of housing and if not embedded in thinking and planning for new or extended settlements, the downside could

¹⁰

<https://www.buglife.org.uk/sites/default/files/When%20is%20Brownfield%20land%20of%20high%20environmental%20value%20June%202015.pdf>

¹¹ http://thelandtrust.org.uk/news/brownfield-or-greenfield-it-is-not-a-black-and-white-issue/?doing_wp_cron=1474478190.2595210075378417968750

¹² <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/green-infrastructure-task-force-report>

be large scale rapid urbanisation without the quality places being created that we need.

Greenspace can easily become sterile, unused and unloved and, as it is at the heart of place making, the new urban areas may become run down and neglected leading to further intensification and anti-social behaviour incidents.

However, well managed green spaces within the built environment can reduce criminal activity.¹³

Delivery mechanisms and infrastructure payments must place biodiversity within the context of social and natural capital.

5. How could existing Mayoral policy and guidance protect and enhance biodiversity more effectively?

By having the mechanisms in place to enable developers to easily embed green infrastructure/green space / biodiversity into their developments.

For example, ensuring the policy clearly includes references to biodiversity within the built environment, the value that biodiversity and green spaces bring to the City, including a clear message that green space is an important factor in any urban environment.

There needs to be clear and simple guidance for developers, explaining how they can create wildlife corridors, create habitats within developments, with advice on what types of habitats are most suitable for the area.

There also needs to be guidance on how to ensure the long term investment for managing the green spaces.

The Land Trust is one example of an organisation set up to provide long term management of green spaces in and around housing developments, undertaking more than just grass cutting regimes. The Land Trust has developed a unique financial model to provide funding solutions for developers to ensure the green space is well maintained in perpetuity through a service charge model, where residents within all new houses contribute to the annual costs of maintaining the green spaces. This funding also contributes towards the cost of a community ranger who generates community involvement, volunteering opportunities, organised events and activities, helping improve the health and wellbeing of residents whilst providing educational opportunities and involvement them in maintaining the habitats, which also support biodiversity.

This model enables the developer to incorporate green spaces within a development without the worry of dealing with these spaces, and without added costs. This solution is cost effective and enables developers to create sustainable places and homes building communities where

¹³ <http://www.citylab.com/cityfixer/2016/04/vacant-lots-green-space-crime-research-statistics/476040/>

people want to live, work and play, rather than simply building houses.

6. What would be the advantages and disadvantages of creating a single piece of planning guidance (most likely an SPG) to cover biodiversity and implementation of ecological mitigation in new housing developments?

Advantages

At the London wide scale there are significant areas of open space – their value is well understood in terms of biodiversity and they have a degree of protection. Brownfield land offers the scope for large new housing developments, such as at Old Oak Common, and if close to the large established greenspaces, there is a tendency to rely on these areas rather than create new greenspace within the new communities. This will leave us with the worst of both worlds, poor greenspace within developments due to the “island effect” reducing biodiversity but extra numbers using and impacting biodiversity in the established parks or open spaces beyond the development.

If an SPG is developed that addresses this question, it will ensure that development briefs or masterplans embed principles into practice- connectivity meaning links between gardens to larger spaces (fence holes etc.), informal spaces rather than managed, log piles and other habitats to be protected within open spaces, wetland areas maintained and function as protective barriers where possible, and even vertical gardens on public buildings and commercial or retail.

These schemes must retain brownfield habitat as a reservoir for species to expand and designs should enable this to happen. Thus ecological planning at the heart of the new zones or communities will set new benchmarks, add to the portfolio of biodiversity hotspots, link up main parks and open spaces, river valleys and other specific opportunities.

Having a single piece of planning guidance, embedded in policy but translated into masterplans and design guidance will provide developers with a clear steer and encourage them to see the key sites as part of their brand for building communities rather than just high density developments.

It would also demonstrate that there was Government will and leadership, and that biodiversity and the natural environment is valued. The approaches could then be linked into Local Plans in the Boroughs. It will promote the notion of what makes open space valuable not just large parks but down to the smallest areas of space, within new housing areas.

By having a single document, it would make it clearer and more transparent to planners and developers that these elements were important parts of a new development.

Disadvantages

If it is only in the strategic level of planning, this guidance may be too vague or broad to influence schemes. It needs to be part of a family of greenspace and biodiversity policies that

go from strategy down through to implementation.

It must be integrated, for example, if it was a single piece of planning guidance separate to the NPPF or London Plan, it could be taken as a less ‘important’ part of planning, since the information is not embedded wholly into the core planning guidance. Therefore, it could be seen as less valuable.

Ultimately, guidance on biodiversity and ecological mitigation measures needs to be taken seriously, and embedded into main policy guidance.

If the decision is to have one policy guidance document at the more strategic level, then it must have the criteria detailed at the delivery level to enable developers to see how this works in practice.

Ultimately, the focus should be on the pre-application stage where any developer must demonstrate how the masterplan will approach the development in terms of biodiversity and green infrastructure, clearly showing how the development will be built in and around the ecology, and ecological inclusions be designed from the outset, and not just be add-ons afterwards.

7. What are the features and benefits of biodiversity offsetting schemes and green space ‘factor’ schemes?
 - a. Are there disadvantages to such schemes?
 - b. We are particularly interested in evidence on how they could be introduced in London and what effects they might have

In the South East, major infrastructure is underway that will enable London to continue to grow and part of this involves development of large housing areas. Notwithstanding there is insufficient space to cope with the anticipated rise in London’s population by over 3 million. Areas surrounding Greater London will come under pressure to provide a considerable amount of new housing and related infrastructure to allow some movement out of London. Whilst London itself may retain a high proportion of greenspace and biodiversity, the problem may be *exported in effect* to surrounding areas.

In areas where there are key sensitive habitats, such as the Thames Basin Heaths, proposed schemes within a certain distance of these designations are required to provide compensatory land, not for offsetting biodiversity but to diverting recreational pressures to these new areas known as SANG sites. So even where new schemes are only close to important designations there has to be compensation. In most areas compensation only arises where biodiversity is directly impacted and it is important that where additional mitigation is required, it should be close to the existing development, i.e. local.

So local compensation should be sought and where green infrastructure or replacement land is needed there should be biodiversity elements embedded rather than simply using new greenspace as compensation for lost habitat, the two are different.

So it is important to note that specific developments need to mitigate within or adjacent to their own sites, rather than further afield. The solutions must be local.

If ecological principles can be built into new developments to enhance air quality, water, food growing, energy as well as biodiversity, human health will also be managed better in and around the new schemes. Densification should not mean that biodiversity is sacrificed but that urban development fits in with these principles rather than the other way round.

By embedding green spaces/infrastructure also increases our resilience to the effects of climate change, reducing our vulnerability through their ecosystem services, some of which are mentioned above, such as providing shade and shelter, reducing the urban heat island effect, improving air quality by reducing pollution, helping to alleviate flooding, storing water, reducing noise and reducing contamination.

- Grass surfaces exposed to sun may be 24°C cooler than concrete
- Tree shade may lower air temperatures by 5 – 7 °C
- Urban parks are on average 1°C cooler than built-up areas (University of Cardiff, 2016)¹⁴
- Planting trees can slow the flow of water and reduce surface water runoff by up to 62% compared to asphalt.
- Trees also increase the interception of water as it falls, increasing the infiltration of water into the soil and lowering the risk of surface water flooding.
- Planting trees could reduce the height of flooding in towns by up to 20% (Woodland Trust 2015)¹⁵

This also has economic impacts, such as reduced costs from flood damage but also the preventative measures:

- Green infrastructure provides flood alleviation and water storage, which costs less to construct and maintain than built flood defences (Natural England 2012)¹⁶

And as mentioned above, green spaces support vital biodiversity, such as threatened pollinators, which are key to our food supply, and as such supporting our food economy.

The current hierarchy of “avoid, mitigate and compensate” development impacts is very site related and should perhaps be considered across a wider area to see how cumulatively an area can cope with the possible biodiversity losses and downgraded ecosystem services.

In fact, new developments could be the catalyst for enhancement if done on the basis of more of an area approach. Plans and policies should consider these wider areas when considering effects and try to assess the contribution each site or area can make to offsetting effects.

¹⁴ www.tandfonline.com/doi/pdf/10.1080/14649357.2016.1158907

¹⁵ www.woodlandtrust.org.uk/mediafile/100631140/pg-wt-300615-residential-developments.pdf?cb=093f261286fd4fdc8befda998e4b7c11

¹⁶ <http://publications.naturalengland.org.uk/publication/6692039286587392>

If implemented effectively, this should mean that developers will not actually lose any important biodiversity from their sites but could perhaps enter into negotiations to buy biodiversity credits similar to SANG mechanisms. The problem is that many sites which may be bio-diverse may not have the same level of protection but can offer enhancement and should gain from such payments, such as brownfield sites which offer scope for enhancement of nature if managed well.

The Land Trust is experienced in developing and working on such innovative models and developers may be able to take forward sites in this context more easily.

8. What are the benefits to biodiversity of planning, designing and managing green infrastructure as a holistic network?

Wildlife needs to be able to move between habitats in order to survive, so creating infrastructure for biodiversity by connecting different habitats via corridors is vital.

This should be holistic and be part of the planning process, design and long term management strategy. Biodiversity and the natural environment (including green infrastructure) will be more resilient if habitats are well maintained and embedded into the build environment.

With so much stress on rural land, as a result of intensive farming practices, there is real opportunity to 'green our cities' and support biodiversity in all areas.

Research undertaken as part of the Biophillic Cities project has demonstrated how developments that have incorporated significant green infrastructure have in fact had a positive net gain on biodiversity. The website provides examples of other cities committing to becoming greener.¹⁷

Furthermore, as mentioned above, the State of Nature report recently published highlights that more than one in 10 UK species is now threatened with extinction and 56% of UK species is in decline. This is extremely worrying and it will require all aspects of society to contribute to supporting biodiversity, otherwise, there will be a real crisis, with major negative impacts on everyone.¹⁸

9. What social benefits could be gained by developing a more comprehensive (and mandatory) strategy for protecting and enhancing biodiversity near housing developments?

There are major social benefits to having a more comprehensive strategy of incorporating biodiversity, green spaces and green infrastructure into and adjacent to housing developments.

These include improved:

¹⁷ <http://biophillicities.org/what-are-biophillic-cities/birmingham/>

¹⁸ <https://ww2.rspb.org.uk/whatwedo/stateofnature2016>

- Bringing people together, breaking down social barriers, creating social cohesion and reducing anti-social behaviour
- For education and learning
- Improving physical and mental health
- Improving the local environment, making places more attractive, strengthening our natural assets to be more resilient to climate change as well as support biodiversity
- Contributing to economic uplift, supporting other businesses, making the wider area more attractive, leading to inward investment, alleviating pressures on other public sector budgets, such as health and social services.

Improving people's health and wellbeing

There is a growing body of research linking the benefits of green space/green infrastructure and nature on improved mental and physical health as well as mounting evidence demonstrating the increasing costs to society and the health sector from physical inactivity.

Our research demonstrates that people using our green spaces have higher levels of satisfaction and wellbeing and lower levels of anxiety compared to the national averages.¹⁹

We know from our own experience that by providing well maintained easily accessible green spaces, with access to nature, networks of paths and trails, people are given opportunities to lead healthier lives and feel happier. People then feel less inclined to visit the doctor or have higher chances of not developing lifestyle related illnesses. More and more research is demonstrating that the natural environment helps combat depression, diabetes, obesity, cardiovascular disease and some cancers. Even the Department of Health recognises that a poor physical environment can be detrimental to the public's physical and mental health²⁰.

In turn, this helps reduce the burden on the NHS and other local services, which are becoming more and more under pressure.

As previously mentioned:

- 90% feel that our green spaces play a positive part in their happiness and wellbeing
- 90% feel that our green spaces encourage them or others to keep fit and healthy
- 25% use our green spaces to relieve stress.²¹

Also mentioned earlier, other research demonstrates the health benefits of green space:

- Those who live within 500m of accessible green space are 24% more likely to meet

¹⁹ <http://thelandtrust.org.uk/wp-content/uploads/2016/01/The-Value-of-our-Green-Spaces-January-2016.pdf>

²⁰

www.gov.uk/government/uploads/system/uploads/attachment_data/file/216096/dh_127424.pdf

²¹ <http://thelandtrust.org.uk/charitable-aims/thebenefits>

recommended levels of physical exercise (Defra 2015)²²

- Just five minutes of exercise in a "green space" such as a park can boost mental health (University of Essex)²³

The Local Government Association also recognises the benefits of exercising outdoors, which involves connecting with nature and biodiversity, and is calling on NHS Clinical Commissioning Groups to drive forward a strategy for GPs to prescribe "green prescriptions"²⁴.

Hospitals are starting to see the benefits of nature, not only to aid patient recovery, but for staff to use for their own health and wellbeing.

Our work with the Countess of Chester Hospital NHS Foundation Trust is a great example of where Senior NHS leaders see the multiple benefits our adjacent park brings.²⁵ Kevin Eccles at the Countess of Chester Hospital said "In particular, staff use it for 'walk and talk' meetings, clinicians use it to have breaks and feel refreshed and patients use it to help them with their recovery".

Contributing to local economic uplift and the wider economy

Having green spaces and natural environments contribute to economic uplift in a local community, such as local contractors undertaking maintenance and construction works, green spaces can create jobs and they also help people find employment through volunteering and attending training sessions.

Our Big Lottery funded educational programme – [Green Angels](#) – delivered at one of our green spaces adjacent to a number of housing developments in a deprived community, aimed to boost community cohesion and create training opportunities. Nearly 70 people participated, and of those seeking work, 44% found employment.²⁶

Our social return on investment study calculated that our own 2,000 hectares of well managed green space contributes the equivalent of £53.2m per year of benefits to the health and welfare sector and £40.9m per year towards the social sector.²⁷

This alleviates financial pressure on multiple public services. External research also demonstrates this:

- Increasing access to parks and open spaces could reduce NHS costs of treating obesity by more than £2 billion (The King's Fund ,2013)²⁸

²² www.gov.uk/government/uploads/system/uploads/attachment_data/file/396840/pb13897-nature-do-for-you.pdf

²³ www.news.bbc.co.uk/1/hi/health/8654350.stm

²⁴ www.local.gov.uk/web/guest/media-releases/-/journal_content/56/10180/7944615/NEWS

²⁵ <http://thelandtrust.org.uk/wp-content/uploads/2016/08/Countess-of-Chester-Country-Park-Health-for-Life-Sept-2016.pdf>

²⁶ <http://thelandtrust.org.uk/charitable-aims/education-and-learning/green-angels-2/>

²⁷ <http://thelandtrust.org.uk/charitable-aims/thebenefits>

- The health benefits of living near green space are worth up to £300 per person per year. (National Ecosystem Assessment 2011)²⁹
- Green Infrastructure helps combat mild and moderate depression and can be more cost-effective than traditional treatments. This could help Wales saved the £16m it spends on the 3.8m anti-depressant prescriptions issued per year Wildlife Trust Wales 2016)³⁰

As mentioned above, but to reinforce the point, our study demonstrates that 90% of survey respondents said that our green spaces help make the local area more desirable, which leads to economic uplift.³¹ Property prices can increase as well – a study in the UK showed that green infrastructure can contribute up to 34% uplift in property values (Wildlife Trusts Wales 2016)³².

Having more attractive areas contributes to inward investment, attracting businesses to because businesses like locations that provide well managed public places. In turn, this creates jobs, improves a business' CSR and also attracts and retains customers, generating further opportunities for local communities.

To conclude, there are significant economic, social and environmental benefits for protecting and enhancing biodiversity near housing developments, as has been outlined above.

It just needs the right policies and guidance in place and the leadership to encourage and implement it.

²⁸ www.kingsfund.org.uk/sites/files/kf/field/field_publication_file/improving-the-publics-health-kingsfund-dec13.pdf

²⁹ www.gov.uk/government/news/hidden-value-of-nature-revealed-in-groundbreaking-study

³⁰ www.wtwales.org/sites/default/files/green_infrastructure.pdf

³¹ <http://thelandtrust.org.uk/wp-content/uploads/2016/01/The-Value-of-our-Green-Spaces-January-2016.pdf>

³² www.wtwales.org/sites/default/files/green_infrastructure.pdf