

Date: 21 February 2024

Item: TfL's Green Infrastructure and Biodiversity

This paper will be considered in public

1 Summary

- 1.1 This paper sets out TfL's strategic work on green infrastructure and biodiversity, including the legislative and policy context and the forthcoming publication of TfL's first organisation-wide Green Infrastructure and Biodiversity Plan.

2 Recommendation

- 2.1 **The Panel is asked to note the paper.**

3 TfL's Green Infrastructure and Biodiversity

- 3.1 TfL is one of the largest landowners in London. Approximately 30 per cent of our land is covered in vegetation that in turn supports more than 1,000 animal species. Many of the species found on our estate are legally protected, and large areas of our land are designated for their nature conservation value.
- 3.2 A conservative assessment found that our green infrastructure and biodiversity has a net present value of £328m. This comprises a wide range of benefits that accrue primarily to Londoners but also to TfL's staff, assets and operations. These include improved air quality, carbon sequestration, improved health and wellbeing, recreation opportunities and climate change adaptation (such as flood risk reduction).
- 3.3 Green infrastructure can also pose risks to our assets, operations and people, for example, through leaf fall on our tracks, or fallen branches on our pavements and roads. Our strong safety-focus means that we must sometimes cut back, or even remove, trees and other green infrastructure from our networks.
- 3.4 However, the scale and importance of our green infrastructure and biodiversity to London presents TfL with a unique opportunity to profoundly influence the way that London looks, sounds and feels for residents, visitors and workers. We can not only maintain a safe and reliable transport network but also help make London more attractive, more liveable, and better able to cope with future climate change.

4 Legislative and Policy Context

- 4.1 The UK has a long history of environmental legislation, much of which focuses on conserving our habitats and wildlife. Of particular note is the Environment Act

2021, which introduces a strengthened 'biodiversity duty' for public authorities¹, as well as mandatory 10 per cent Biodiversity Net Gain (BNG) for new developments going through the planning system.

- 4.2 The Mayor's Transport Strategy (MTS), despite being published three years prior to the Environment Act 2021, recognised the importance of green infrastructure and biodiversity. It included commitments on street tree planting, BNG, designated sites known as Sites of Importance for Nature Conservation, and Sustainable Drainage Systems (SuDS).
- 4.3 These commitments were incorporated into TfL's Corporate Environment Plan, which also set out in more detail what TfL aimed to achieve with regard to green infrastructure and biodiversity, as well as a series of commitments and high-level actions to meet those aims. These are reflected in the TfL Strategy, the corporate strategy for TfL which includes 'Green' (i.e. environment) as one of its five priorities.
- 4.4 TfL's current Adaptation Plan and forthcoming Green Infrastructure and Biodiversity Plan elaborate on the actions that different parts of TfL need to take to meet TfL's legal requirements and policy commitments.
- 4.5 At the same time, external reporting requirements are increasing. The Taskforce on Nature-related Financial Disclosures, which mirrors the Task Force on Climate-related Financial Disclosures, was released in September last year and is likely to become mandatory in the future.
- 4.6 We anticipate that increasing awareness of the scale and importance of the biodiversity crisis will result in increasing scrutiny and regulation.

5 Progress to Date

- 5.1 We have made some good progress on green infrastructure and biodiversity since the publication of the MTS. For example, we have:
 - (a) continued to meet the MTS street tree planting target – by one per cent every year between 2016 and 2025;
 - (b) developed a TfL SuDS target of an additional 5,000 m² per annum in our Adaptation Plan, which we are on track to meet;
 - (c) doubled the roll out of wildflower verges on our road network (with a total of 260,000 sqm planned by the end of 2024);
 - (d) reduced highways glyphosate use by 70 per cent since 2017; and
 - (e) created a biodiversity baseline map showing the various habitat types of our green estate.

¹ The biodiversity duty requires public authorities, such as TfL, to:

- consider what can be done to conserve and enhance biodiversity;
- agree policies and specific objectives based on that consideration;
- act to deliver those policies and achieve objectives.

- 5.2 Nevertheless, there is more work to do, for example on managing our designated sites more effectively, ensuring we meet our biodiversity net gain obligations as cost-effectively as possible, and improving our green infrastructure data.

6 TfL's New Green Infrastructure and Biodiversity Plan

- 6.1 With the forthcoming publication of the Green Infrastructure and Biodiversity Plan, TfL will have a solid foundation of actions to help us cost-effectively meet our legal requirements and policy commitments. The challenge will be to implement those actions and deliver those requirements and commitments.
- 6.2 This will be achieved by integrating green infrastructure and biodiversity into our:
- (a) leadership, governance and finance, with a particular focus on culture change through training, as well as much-needed data improvements;
 - (b) Capital and Operations activities to deliver not only on safety but also on our broader sustainability goals; and
 - (c) collaboration, communication and reporting to bring internal and external stakeholders, as well as the public, with us on this journey of change and improvement.

7 Focus on Biodiversity Net Gain

- 7.1 A good example of how a strategic approach can not only help TfL meet its green infrastructure and biodiversity legal requirements and policy commitments but also help TfL meet its financial sustainability goal is BNG.
- 7.2 The Environment Act 2021 requires a minimum 10 per cent net gain in biodiversity for new major projects in the planning system from 12 February 2024 and for small sites from April 2024. This requirement will be applicable to Nationally Significant Infrastructure Projects from November 2025. This is measured in 'biodiversity units' that are calculated using the Department for Environment, Food and Rural Affairs' biodiversity metric spreadsheet and depend on factors such as habitat area, distinctiveness and condition.
- 7.3 Places for London is already over-delivering on BNG through its Sustainable Development Framework. However, it will be challenging to meet this requirement on our operational estate, as many of the development projects required to improve London's public transport networks are on narrow corridors of land, which constrain the delivery of BNG on-site.
- 7.4 Where BNG cannot be delivered on-site, off-site compensation is permitted, either on the developer's own land, or on third-party land through the purchase of biodiversity units. If neither of these options is possible, the Government permits the purchase of statutory biodiversity credits, which are priced high to ensure they are only considered as a last resort.
- 7.5 A strategic approach involving the pre-emptive development of a TfL 'habitat bank' in advance of project need for biodiversity units would, over time, reduce the costs of compensating for biodiversity loss as a result of TfL development

projects. It could also generate surplus units that could be purchased by third-party developers.

- 7.6 As BNG becomes more established as a statutory requirement, it is likely that local planning authorities will require a greater than 10 per cent net gain to grant planning permission. A bank of already-created biodiversity units will, therefore, only become more important over time. This approach will, however, require important changes in the way that TfL manages projects, green infrastructure maintenance, and related data collection and storage.

8 Conclusion

- 8.1 To truly meet TfL's vision to be the strong, green heartbeat for London, green infrastructure and biodiversity considerations must be fully embedded in all relevant processes and decision-making. This will be a long process and, in some cases, will require fundamental changes to the way that we work. However, the benefits, for example, in terms of reduced risk and financial exposure and increased natural capital value, are significant.

List of appendices to this report:

Appendix 1 – Glossary

List of Background Papers:

Mayor's Transport Strategy
Corporate Environment Plan
TfL Green Strategy

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Appendix 1 – Glossary

Biodiversity is the diversity of all living things, from species to genes to ecosystems.

Green infrastructure is the network of parks, green spaces, gardens, woodlands, rivers, green roofs, street planting, rail and road verges and wetlands that is planned, designed and managed to: promote healthier living; lessen the impacts of climate change; improve air quality and water quality; encourage walking and cycling; store carbon; and improve biodiversity and ecological resilience.

Natural capital is the set of environmental resources – including green space, air, water, wildlife – that provides services, such as flood protection or cleaner air, that benefit the wellbeing of Londoners and the city's economy. Like other forms of capital, such as human capital and goods and services, natural capital is a valuable asset that must be managed sustainably to maintain and improve these benefits.