

GREATER LONDON AUTHORITY

[REDACTED]
(By email)

Our Ref: MGLA230120-1093

18 March 2020

Dear [REDACTED]

Thank you for your request for information which the Greater London Authority (GLA) received on 23 January 2020. Your request has been dealt with under the Environmental information regulations (EIR) 2004.

You asked for:

*It is written in the Combined HRA report for the London Plan produced by AECOM:
"31/10/17 Updated to account for Draft for public consultation November 2017
version"*

Please can you send me the following information:

- 1. Correspondence relating to the public consultation between any person or persons, whether working for the GLA or for a third party, including AECOM*
- 2. Responses received in writing in any form to the consultation*
- 3. Anything in writing advertising the consultation together with the place(s) that such advertising was posted or sent*
- 4. Any correspondence, report or meeting notes or minutes referring to the consultation or the results/ conclusions drawn/ decisions made, and actions taken as a result of the public consultation?*

Our response to your request is as follows:

Please find attached the following information we have identified as within scope of your request:

Part 1 – You have referenced the public consultation, I am therefore taking that to mean the updated HRA report July 2018 which was updated following the 2017 public consultation.

Please find attached the communications we hold within scope of your request relating to the July 2018 update report which relates to the public consultation.

Part 2:

- Natural England letter 22nd Sept 2017 – Please see attached

- Natural England's Response¹ (2nd March 2018)
- Natural England's written statement² (1st Dec 2018) – to note this was provided in advance of the Examination in Public.

Part 3 – Please find attached:

- Notice of deposit of the proposed draft London Plan (Spatial Development Strategy for Greater London)
- The HRA was advertised in London Gazette (see attached) and London Evening Standard on 1 December 2017 - see attached advert for the London Gazette. Unfortunately, we did not keep the advert for the London Evening Standard as a copy.

Part 4:

- HRA Report Dec 2017³ (section 10 and Appendix B)
- HRA Report update July 2018⁴ (section 10 and appendix B)
- MD2184⁵ - Consultation
- MD2337⁶ New draft London Plan suggested changes
- You may also be interested in the following information:
- There was a meeting held between Natural England and GLA Officers in November 2018 to explain the GLA's position in advance of the hearing session in January 2019 – However we do not hold notes of the meeting.
- HRA report Update Dec 2019⁷ (section 10, section 13 and appendix B):
- Mayor of London Written Statements⁸

The GLA holds further communications within scope of part 1 and 4 of your request and they fall under the exception to disclose at Regulation 12(4)(e) and Regulation 12 (5)(b) (The course of justice and inquiries exception).

Regulation 12(4)(e) applies to communications explicitly whereby GLA officials have engaged in free and frank discussions on matters pertaining to internal drafts of working documents as part of the process of preparing the London Plan. The final decision on the London Plan has not been taken by the Mayor as we still have further stages yet to complete. The exception is engaged in order to protect the necessary space to explore ideas in private against the backdrop of a project which is under great public, media and political scrutiny.

Regulation 12 (5)(b) (The course of justice and inquiries exception): This exception is very wide in coverage, in this instance it is used to cover material covered by legal professional privilege (LPP). LPP exists in this instance to protect advice from lawyer to client.

¹ <https://www.london.gov.uk/sites/default/files/Natural%20England%20%282989%29.pdf>

² https://www.london.gov.uk/sites/default/files/m3_natural_england_2989.pdf

³ https://www.london.gov.uk/sites/default/files/draft_hra_report.pdf

⁴ https://www.london.gov.uk/sites/default/files/london_plan_hra_update_report_july_2018.pdf

⁵ <https://www.london.gov.uk/decisions/md2184-draft-new-london-plan-public-consultation>

⁶ <https://www.london.gov.uk/decisions/md2337-draft-new-london-plan-minor-suggested-changes>

⁷ https://www.london.gov.uk/sites/default/files/hra_report_december_2019.pdf

⁸ https://www.london.gov.uk/sites/default/files/mayor_of_london_-_m3_hra.pdf

For the exception to be engaged, disclosure of the requested information must have an adverse effect on the course of justice. Disclosure of the exchange between client and lawyer would undermine the public confidence in the efficacy of LPP.

Regulation 12 (4)(e) and Regulation 12(5)(b) constitute as qualified exemptions from our duty to disclose information under the EIR, and consideration must be given as to whether the public interest favouring disclosure of the information covered by this exemption outweighs the public interest considerations favouring maintaining the exemption and withholding the information.

Effective decision making should be informed by engaging with the public and key stakeholders; however, this engagement needs to be structured to be effective. Release of this information at this time would divert attention and resources away from the task at hand and towards responding to external thoughts whilst discussions are still ongoing. This in turn would also be likely to have an adverse effect on the GLA's ability to engage in free-flowing and honest exchanges of views in the future as it is likely that officials would become reluctant to explore all options.

The GLA acknowledges that there is a public interest in transparency in relation to planning and development matters, disclosure would enable the local community to understand more fully the decision-making process.

However, these communications took place in circumstances where a relationship of confidence was implied, and it is in the public interest to protect the principle of Legal Professional Privilege by allowing clients to have discussions with their lawyers in confidence. The best interest of the public – i.e. the public interest – is best served by ensuring that public authorities continue to debate robustly and comprehensively, considering all options and their potential impacts, for the best possible decisions to be taken.

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely


Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

[REDACTED]

From: [REDACTED] <[REDACTED]@aecom.com>
Sent: 07 April 2017 08:29
To: [REDACTED]
Cc: [REDACTED]
Subject: London Plan HRA: Working Draft Wider South East Policy and the Working Draft Wider South East Corridors Policy

Dear [REDACTED]

We have undertaken HRA screening of the following two policies:

- Working Draft Wider South East Policy, and the
- Working Draft Wider South East Corridors Policy

Working Draft Wider South East Policy is positive. Part D promotes the joint preparation of evidence and encourages plan preparation by Authorities outside of GLA to take into account long term trends and mitigation. This could for example be a tool to encourage the London Boroughs around Epping Forest (Brentwood, Redbridge and Waltham Forest) to work with the Essex authorities north of Epping Forest to manage air quality and recreational pressure issues associated with that SAC.

The development of Growth Corridors as discussed in The Working Draft Wider South East Corridors Policy does have the potential to impact upon European designated sites dependant on the nature and scale of the development and how they are delivered. However, no policy text explicitly provides for any location, type or quantum of development.

Overall these policies do not provide for any development, but merely identify the way in which the Mayor wishes to interact with neighbouring Authorities in the WSE and strategically address issues relating to WSE Corridors with neighbouring partners. As such we have not identified any impact pathways present and these policies can both be screened out. As such, we do not have any recommendations to make with regards to these policies to ensure no likely significant effects.

We will incorporate this analysis into the development of the HRA report.

If you have any queries please do not hesitate to contact us.

We look forward to receiving the next batch of Policies to assess.

Kind regards

[REDACTED]

[REDACTED] BSc. (Hons) MSc. MCIEEM
Consultant Ecologist, Environment and Ground Engineering, UK & Ireland

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[Click to view and download the AECOM Ecology Year Planner](#)

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[REDACTED]

From: [REDACTED] <[REDACTED]@aecom.com>
Sent: 28 April 2017 12:05
To: [REDACTED]
Cc: [REDACTED]
Subject: Policy review

Hi [REDACTED]

We have undertaken HRA screening of the following policies:

- Policy OE1 – Green Belt
- Policy OE2 – Metropolitan Open Land
- Policy OE3 – Green infrastructure and Local Open Space
- Additional Policy – Green Roofs
- Policy OE4 – Biodiversity
- Policy OE5 – Trees and Woodland
- Policy OE6 – Geodiversity
- Policy OE7 – Burial Space

None of these policies raises particular concerns from a HRA perspective.

I'm not sure the policies in the bullet points above are numbered correctly (they are different to the attachment), so I will refer to the text as in the attachment.

Policy OE5 (Biodiversity and Access to Nature) is positive in seeking to protect sites of importance for nature conservation. It would be worth considering whether to more specifically outline the levels of protection afforded to these sites. In the section that discusses '*where harm to site of importance of nature conservation is unavoidable...*' where this would apply to an International Site, a Habitats Regulations Assessment would need to be undertaken in line with the Conservation of Habitats and Species Regulations (2010). Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects with predicted adverse impacts on European sites may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

The Strategic Policy on Multi-Functional Green & Open Environment is positive in promoting protection of open space, using open space to promote sustainable modes of transport, and providing access to nature. The supporting text outlines approaches to maximising opportunities to improve functionality of open spaces. Natural Green Space of appropriate character and function provision is an important aspect in ensuring that recreational pressure on International Sites can be avoided/mitigated. Therefore this policy provides a useful umbrella for delivery of natural green space.

Policy OE3 (Local Open and Green Space) builds on this by seeking to protect and increase green space capacity. The development of a Green Space Factor is evidently still ongoing, but it is worth noting that where there is potential for recreational pressure on International Sites, Natural England have developed an Accessible Natural Green Space Standards (ANGSt) Model that defines what they expect in terms of natural green space provision in relation to quantum and location of development. This may be useful in guiding development of a Green Space Factor.

We will incorporate this analysis into the development of the HRA report.

If you have any queries please do not hesitate to contact us.

We look forward to receiving the next batch of Policies to assess.

Thanks

[REDACTED]
[REDACTED]
[REDACTED]
Senior Ecologist, Environment and Ground Engineering, UK & Ireland

[REDACTED]
[REDACTED]
[\[REDACTED\]@aecom.com](mailto:[REDACTED]@aecom.com)

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Midpoint

[REDACTED]

From: [REDACTED] <[REDACTED]@aecom.com>
Sent: 12 May 2017 11:27
To: [REDACTED]
Cc: [REDACTED]
Subject: Health & Social Infrastructure Policies and Heritage Policies - HRA

Hi [REDACTED]

We have undertaken HRA screening of the following policies:

- Policy ??? – Healthy City/ Reducing Health Inequalities
- Policy 1 – Developing London's social Infrastructure
- Policy 2 – Health and Social Care Facilities
- Policy 3 – Education Facilities
- Policy 4 – Play and Informal Recreation
- Policy 5 – Sports and Recreation Facilities
- Policy 6 – Public toilets
- Policy 7 – Healthy Food

None of these policies raises particular concerns from a HRA perspective.

Policy ??? (Healthy City/ Reducing Health Inequalities) is positive in promoting the need for Local Plans to ensure that proposals for new development provide accessible local green space. Natural Green Space of appropriate character and function provision is an important aspect in ensuring that recreational pressure on International Sites can be avoided/mitigated. The policy also promotes the need for Local Plans to reduce air pollution. Sites such as Epping Forest SAC are vulnerable to air pollution and therefore policy commitments to reductions in air pollution represent a beneficial approach.

Policies 1 and 5 are positive in promoting walking and cycling, which can potentially lead to air quality improvements through reduced reliance on motor vehicles.

We have also reviewed the following policies:

- Policy HD1 - London's heritage objectives
- Policy HD2 - Heritage-led growth
- Policy HD3 - World Heritage Sites
- Policy HD4 - Strategic Views
- Policy HD5 - Implementing the London View Management Framework

None of these policies raises particular concerns from a HRA perspective.

We will incorporate this analysis into the development of the HRA report. If you have any queries please do not hesitate to contact us.

We look forward to receiving the next batch of Policies to assess.

Thanks

[REDACTED]
[REDACTED] MCIEEM
Senior Ecologist, Environment and Ground Engineering, UK & Ireland

[REDACTED]
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[REDACTED]

From: [REDACTED] <[REDACTED]@aecom.com>

Sent: 19 May 2017 13:37

To: [REDACTED]

Cc: [REDACTED]@arup.com

Subject: Transport and aviation policies HRA screening

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] and [REDACTED]

[REDACTED] [REDACTED] MCIEEM
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[REDACTED]

From: [REDACTED] <[REDACTED]@aecom.com>
Sent: 27 June 2017 16:48
To: [REDACTED]
Subject: RE: Sustainable Infrastructure Policies

Hi [REDACTED]

I have been through the policies below and do not consider they pose any risk to European sites:

Policy H 6 - Large scale purpose built shared living Policy H 5- Purpose Built Student Accommodation
SP2 Healthy City
SP5 London's Economy
SP6 Efficiency and Resilience
SP1 Strong and Inclusive Communities
Policy SI 1 Digital Connectivity Infrastructure Policy SI 2 Minimising Greenhouse Gas Emissions Policy SI 3 Energy Systems Policy SI 6 Safeguarded Waste Sites Policy SI 9 Improving Air Quality Policy SI 10 Noise Policy SI 11 Managing Heat Risk Policy SI 12 Flood Risk Management Policy SI 13 Sustainable Drainage Policy SI 14 Water Infrastructure Policy SI 15 Waterways - Strategic Role Policy SI 16 Waterways - Transport Policy SI 17 Waterways - Use & Enjoyment Policy SI 18 Protecting London's Waterways Delivering the Homes London Needs - Clearly delivery of more homes presents potential for effects that will need to be explored in more detail once the housing targets are known, but the text of this actual policy doesn't lead to LSE

With regard to 'Best Use of Land', this is all positive (particularly giving priority to sustainable transport options to support a strategic target of an 80% mode share for walking, cycling and public transport). In the supporting text where it mentions 'In many cases, strategically important accessible green and open spaces link across the Greater London boundary, for example the Lea Valley Regional Park, Epping Forest and also the River Thames. Such spaces require a positive cross boundary approach to their protection and multifunctional long-term management' there is an opportunity to be more specific. For Epping Forest, which has been identified by site managers to be under pressure from recreation, rather than just referring to a positive cross boundary approach they could be more specific i.e. Waltham Forest and Redbridge in particular should work proactively to manage recreational pressure from growth in their authorities which visitor survey data indicates are major contributors to visitor pressure on the site.

I am still going through the remaining policies.

[REDACTED]

[REDACTED]
[REDACTED]
Associate Director (Ecology & Habitat Regulations Assessment)

AECOM
Direct dial: [REDACTED] (internal short dial: [REDACTED]@aecom.com)

-----Original Message-----
From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 20 June 2017 19:58
To: [REDACTED]
Subject: Fwd: Sustainable Infrastructure Policies

[REDACTED]

Please find attached the sustainable infrastructure policies for the HRA

Kind Regards

[REDACTED]

Sent from my iPhone

Begin forwarded message:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]:

From: [REDACTED] <[REDACTED]@london.gov.uk> [mailto:[REDACTED]@london.gov.uk]>>

Date: 20 June 2017 at 19:52:10 BST

To: "[REDACTED]@arup.com" <[REDACTED]@arup.com>

<[REDACTED]@arup.com> [mailto:[REDACTED]@arup.com]>>

Subject: Fwd: Sustainable Infrastructure Policies

[REDACTED]

Please find attached the sustainable infrastructure policies for IIA.

Kind regards

[REDACTED]

Sent from my iPhone

Begin forwarded message:

From: [REDACTED]@london.gov.uk <[REDACTED]@london.gov.uk>>

Date: 20 June 2017 at 16:41:00 BST

To: [REDACTED] <[REDACTED]@london.gov.uk> [mailto:[REDACTED]@london.gov.uk]>>

Cc: [REDACTED]

[REDACTED]

Subject: Sustainable Infrastructure Policies

Hi [REDACTED] the attached version of the policies is now ready to go for IIA.

There are still a few areas where we need a bit of further info/refining but we have picked up most of the outstanding points.

This version is saved in the folder under Environment/IIA

Best regards

[REDACTED]
Principal Planner (Local Plans)
Greater London Authority
City Hall
The Queens Walk
London SE1 2AA
[REDACTED]

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The information in this email may contain confidential or privileged materials.
For more information see <https://www.london.gov.uk/about-us/email-notice/>

[REDACTED]

From: [REDACTED] <[REDACTED]@aecom.com>
Sent: 06 July 2017 10:07
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: London Plan - Housing Policy

Hi [REDACTED]

Apologies, I thought I had replied on these but they appear to have slipped through:

- Redevelopment of existing building stock and Estate Regeneration – no HRA issues
- Ensuring best use of Stock – no HRA issues
- Supported and specialist Housing – No HRA issues
- Housing Mix – No HRA issues
- Accessible Housing – no HRA issues

Essentially, none of these raise HRA issues because the potential impacts of growth on a European site aren't really affected by whether housing is accessible, whether it is affordable etc. but are more closely related to net quantum and location.

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]
Associate Director (Ecology & Habitat Regulations Assessment)

AECOM

Direct dial: [REDACTED] (internal short dial: [REDACTED])

aecom.com

From: [REDACTED] [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 04 July 2017 18:17
To: [REDACTED]
Cc: [REDACTED] ([REDACTED] [REDACTED] [REDACTED] [REDACTED])
Subject: RE: London Plan - Housing Policy

[REDACTED] / [REDACTED]

Have you had a chance to look at the other housing policies – see attached email.

Thanks

[REDACTED] [REDACTED] **MRTPI**
Strategic Planning Manager
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

From: [REDACTED] [mailto:[REDACTED]@aecom.com]
Sent: 19 June 2017 11:37
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: London Plan - Housing Policy 1

Hi [REDACTED]

We have undertaken HRA screening of the following policies:

AH1-AH8:

- Delivering Affordable Housing
- Threshold Approach
- Affordable Housing Tenure
- Viability Assessments
- 10 units or less
- AF Opportunity Areas
- AF Monitoring and Review
- Vacant Building Credit

These policies are concerned with affordable housing – i.e. the nature of the housing to be delivered, rather than specific locations or quanta of housing. Therefore there are no HRA implications arising from these policies. Theoretically, Policy AH8 (Vacant Building Credit) could lead to adverse effects on SACs/SPAs/Ramsar sites, as the policy advocates a mechanism to facilitate the potential for re-development on vacant brownfield sites that would not otherwise come forward for development. However, the policy makes clear that in London, this kind of development opportunity is highly unlikely to come forward, and it is also clear that the scale of development would be likely to be extremely limited. The supporting text to the policy states that any potential development must be in accordance with the 'development plan', which will effectively mean that the development will need to be in accordance with other policies within the Plan which will have been subject to HRA screening:

It is important to note that Sections 38(6) and 70(2) of the Town and Country Planning Act 1990 are clear that the determination of an application must be made in accordance with the development plan unless material considerations indicate otherwise.

Therefore, it is possible to conclude no likely significant effects of policy AH8 on European protected wildlife sites.

- Accessible Housing

This policy is concerned with the nature of the housing to be delivered, rather than specific locations or quanta of housing. Therefore there is no HRA implication arising from this policy.

- Redevelopment of existing building stock and Estate Regeneration
- Ensuring best use of Stock
- Supported and specialist Housing
- Housing Mix

These policies are concerned with housing use specifications – i.e. the nature of the housing to be delivered, rather than specific locations or quanta of housing. Therefore there are no HRA implications arising from these policies.

Thanks - if you have any queries please don't hesitate to contact us.

[REDACTED]



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[REDACTED]

From: [REDACTED] <[REDACTED]@aecom.com>
Sent: 06 July 2017 14:02
To: [REDACTED]@arup.com
Subject: RE: London Plan assessment

Hi

HRA commentary below:

- HS5 (Build to Rent) – no HRA issues
- Basement Developments – no HRA issues
- TC1 (Town Centres Strategy) – no HRA issues
- TC2 (Town Centre Network) – no HRA issues; the expected levels of growth in town centres of a particular classification could potentially contribute to overall adverse effects but in the absence of those data the policy itself would not lead to likely significant effects
- TC3 (Town Centres – Development principles and Local Plans) – no HRA issues
- Policy C4 (Agent of Change) – no HRA issues
- Strategic and Local Regeneration – Clearly some of the identified strategic areas are closer to European sites than others (the River Lee/Lea corridor in Haringey, Waltham Forest and Enfield for example stands out from the plan as a big wash of blue and is fairly close to Epping Forest SAC, so there is a consideration there for local authorities when planning their growth). However, there is no specified growth quantum allocated to that area in this policy so the policy doesn't present likely significant effects on any European sites.
- CAZ1 and CAZ2 – no HRA issues

I couldn't find a policy on 'Security, Safety and Resilience to Emergency' in this pack?

Regards

[REDACTED]

[REDACTED]
Associate Director (Ecology & Habitat Regulations Assessment)

AECOM

Direct dial: [REDACTED] (internal short dial: [REDACTED])
[REDACTED]@aecom.com

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 04 July 2017 20:09
To: [REDACTED]@arup.com; [REDACTED]
Subject: London Plan assessment

[REDACTED] and [REDACTED]

Please find attached the following policies for assessment

- Agent of Change
- Built to Rent
- Gypsies and Travellers
- Town Centres
- CAZ

- Strategic and Local Regeneration
- Basements
- Security, Safety and Resilience to Emergency

Just to let you know, the outstanding ones are:

- Growth Areas/ Opportunity Areas
- Parking
- Accessible Housing
- Community led housing

Kind Regards

[REDACTED]
[REDACTED]
[REDACTED]
Strategic Planning Manager
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

[REDACTED]
[REDACTED]

[REDACTED]

#LondonIsOpen

[REDACTED]

From: [REDACTED] <[REDACTED]@aecom.com>
Sent: 07 July 2017 15:29
To: [REDACTED]
Subject: RE: Waste and minerals policies

Hi

I haven't provided my thoughts on these policies yet:

SI4 (Reducing Waste and Supporting Circular Economy) and SI5 (Waste Capacity and net Waste Self Sufficiency) - Both essentially positive in that the ultimate objective is for London to manage the equivalent of 100% of its own waste in London and it looks as if the projection is for a net reduction in waste generation. If the process of importing/exporting waste to achieve 100% effective self-sufficiency resulted in a net increase in waste traffic on the roads into/out of London so there could be a net increase on waste-related traffic on the roads through Epping Forest SAC (in particular). However, I suppose that would be linked to the capacity of the receiving waste sites and any proposals for expansion of their capacity would need to be subject to various assessments including HRA.

SI6 (Safeguarded Waste Sites) - no HRA issues since this is just a safeguarding policy

SI7 (Aggregates) - one of the main boroughs receiving an apportionment (Redbridge) includes major routes that run past Epping Forest SAC. However, I note the policy emphasises use of sustainable transport modes so I don't think there is an automatic conclusion of potential HRA issues.

SI8 (Fracking) - no HRA issues

SI9 (Improving Air Quality) - no HRA issues and presents another pro-active peg for coordinating the interaction between the key Epping Forest SAC authorities (particularly Redbridge, Waltham Forest and Transport for London) to input into improving air quality in that SAC such as through formulation and delivery of the next generation (post-2017) Forest Transport Strategy along with the south Essex authorities.

Regards

[REDACTED]

[REDACTED]
Associate Director (Ecology & Habitat Regulations Assessment)

AECOM
Direct dial: [REDACTED] (internal short dial: [REDACTED]@aecom.com)

-----Original Message-----

From: [REDACTED]
Sent: 04 July 2017 15:39
To: [REDACTED] ([REDACTED]@london.gov.uk)
Subject: RE: Sustainable Infrastructure Policies

Hi

Did you get to the bottom of the issue with the PO?

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

Associate Director (Ecology & Habitat Regulations Assessment)

AECOM

Direct dial: [REDACTED] (internal short dial: [REDACTED] [REDACTED]@aecom.com

-----Original Message-----

From: [REDACTED] [REDACTED] ([REDACTED])

Sent: 29 June 2017 08:35

To: [REDACTED] [REDACTED]

Subject: RE: Sustainable Infrastructure Policies

Hi

No, it hasn't arrived yet - do you know how long it normally takes?

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

Associate Director (Ecology & Habitat Regulations Assessment)

AECOM

Direct dial: [REDACTED] (internal short dial: [REDACTED] [REDACTED]@aecom.com

-----Original Message-----

From: [REDACTED] [REDACTED] [mailto:[REDACTED]@london.gov.uk]

Sent: 27 June 2017 17:46

To: [REDACTED] [REDACTED] ([REDACTED])

Subject: RE: Sustainable Infrastructure Policies

Thanks

Did you receive the PO?

-----Original Message-----

From: [REDACTED] [REDACTED] ([REDACTED] [mailto:[REDACTED]@aecom.com])

Sent: 27 June 2017 16:48

To: [REDACTED] [REDACTED]

Subject: RE: Sustainable Infrastructure Policies

Hi [REDACTED]

I have been through the policies below and do not consider they pose any risk to European sites:

Policy H 6 - Large scale purpose built shared living
Policy H 5- Purpose Built Student Accommodation
SP2 Healthy City
SP5 London's Economy
SP6 Efficiency and Resilience

SP1 Strong and Inclusive Communities

Policy SI 1 Digital Connectivity Infrastructure Policy SI 2 Minimising Greenhouse Gas Emissions Policy SI 3 Energy Systems Policy SI 6 Safeguarded Waste Sites Policy SI 9 Improving Air Quality Policy SI 10 Noise Policy SI 11 Managing Heat Risk Policy SI 12 Flood Risk Management Policy SI 13 Sustainable Drainage Policy SI 14 Water Infrastructure Policy SI 15 Waterways - Strategic Role Policy SI 16 Waterways - Transport Policy SI 17 Waterways - Use & Enjoyment Policy SI 18 Protecting London's Waterways

Delivering the Homes London Needs - Clearly delivery of more homes presents potential for effects that will need to be explored in more detail once the housing targets are known, but the text of this actual policy doesn't lead to LSE

With regard to 'Best Use of Land', this is all positive (particularly giving priority to sustainable transport options to support a strategic target of an 80% mode share for walking, cycling and public transport). In the supporting text where it mentions 'In many cases, strategically important accessible green and open spaces link across the Greater London boundary, for example the Lea Valley Regional Park, Epping Forest and also the River Thames. Such spaces require a positive cross boundary approach to their protection and multifunctional long-term management' there is an opportunity to be more specific. For Epping Forest, which has been identified by site managers to be under pressure from recreation, rather than just referring to a positive cross boundary approach they could be more specific i.e. Waltham Forest and Redbridge in particular should work proactively to manage recreational pressure from growth in their authorities which visitor survey data indicates are major contributors to visitor pressure on the site.

I am still going through the remaining policies.

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

Associate Director (Ecology & Habitat Regulations Assessment)

AECOM

Direct dial: [REDACTED] (internal short dial: [REDACTED] [REDACTED] aecom.com

-----Original Message-----

From: [REDACTED] [REDACTED] [mailto:[REDACTED]@london.gov.uk]

Sent: 20 June 2017 19:58

To: [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

Subject: Fwd: Sustainable Infrastructure Policies

[REDACTED]

Please find attached the sustainable infrastructure policies for the HRA

Kind Regards

[REDACTED]

Sent from my iPhone

Begin forwarded message:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Please find attached the sustainable infrastructure policy for legal comments.

Kind Regards

[REDACTED]

Sent from my iPhone

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk> [mailto:[REDACTED]@london.gov.uk]>
Date: 20 June 2017 at 19:52:10 BST
To: "[REDACTED]@arup.com" <[REDACTED]@arup.com>
<[REDACTED]@arup.com> [mailto:[REDACTED]@arup.com]>
Subject: Fwd: Sustainable Infrastructure Policies

[REDACTED]

Please find attached the sustainable infrastructure policies for IIA.

Kind regards

[REDACTED]

Sent from my iPhone

Begin forwarded message:

From: [REDACTED]@london.gov.uk <[REDACTED]@london.gov.uk>
Date: 20 June 2017 at 16:41:00 BST
To: [REDACTED] <[REDACTED]@london.gov.uk> [mailto:[REDACTED]@london.gov.uk]>
Cc: [REDACTED]@london.gov.uk <[REDACTED]@london.gov.uk>, [REDACTED]
[REDACTED]@london.gov.uk <[REDACTED]@london.gov.uk>, [REDACTED]
[REDACTED]@london.gov.uk <[REDACTED]@london.gov.uk>, [REDACTED]
[REDACTED]@london.gov.uk <[REDACTED]@london.gov.uk>, [REDACTED]
[REDACTED]@london.gov.uk <[REDACTED]@london.gov.uk>
Subject: Sustainable Infrastructure Policies

Hi [REDACTED] the attached version of the policies is now ready to go for IIA.

There are still a few areas where we need a bit of further info/refining but we have picked up most of the outstanding points.

This version is saved in the folder under Environment/IIA

Best regards

[REDACTED]
Principal Planner (Local Plans)
Greater London Authority
City Hall
The Queens Walk
London SE1 2AA
[REDACTED]

[REDACTED]

From: [REDACTED] <[REDACTED]@aecom.com>
Sent: 10 July 2017 13:41
To: [REDACTED]@arup.com
Subject: RE: London Plan - OAs and GRowth Corridors

Hi

I have reviewed this text from an HRA perspective. I don't think likely significant effects will arise because either the areas concerned are remote from European sites or because the overall focus is on unlocking growth in these areas through improvement/delivery of sustainable public transport which will be positive for air quality. Indeed, delivery of Crossrail 2 and the Trams Triangle proposals may well be positive for air quality at Wimbledon Common SAC by removing vehicles from the local road network.

However, I have identified a few points:

- The Lee Valley corridor is related to the potential unlocked by Crossrail 2 and this in itself may be positive for local air quality including around the northern part of the corridor near Epping Forest SAC. Similarly, broadening employment opportunities in Stoke Newington, Blackhorse Lane etc. could also be positive by reducing the need for residents to travel out of the borough to work and thus reduce traffic on the road network. However, the requirement that for the Lee Valley corridor '*The Planning framework should ensure that industrial, logistics and commercial uses continue to form part of the overall mix of uses in the area and that opportunities for intensification of industrial land and co-location of industrial and residential uses are fully explored*' also needs to be mindful of the fact that due consideration will be needed to avoid an associated significant increase in vehicular freight traffic through Epping Forest SAC, by maximising connectivity to the strategic rail network.
- '*Tottenham and Walthamstow contain clusters of creative industries which should be protected and supported. It should also protect and improve access to the Lee Valley Regional Park and reservoirs*'. Clearly there are a lot of steps already in train to increase access to the Lee Valley area for recreation (e.g. Walthamstow Wetlands project) but I would suggest that the word 'sustainable' is inserted before 'access' as theoretically too much unmanaged access could start to cause harm.
- New Southgate is relatively close to Epping Forest SAC from a traffic/air quality point of view. However, the Opportunity Area is clearly linked to provision of greater public transport and Crossrail 2 (as well as undergrounding the north circular). All potentially positive for air quality in the SAC.

[REDACTED]

[REDACTED]
Associate Director (Ecology & Habitat Regulations Assessment)

AECOM

Direct dial: [REDACTED] (internal short dial: [REDACTED])

[\[REDACTED\]@aecom.com](mailto:[REDACTED]@aecom.com)

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 10 July 2017 11:10
To: [REDACTED]@arup.com; [REDACTED]
Subject: London Plan - OAs and GRowth Corridors

Dear All

Please find attached the following policies for assessment

Growth Areas

- Opportunity Areas and Growth Corridors

[REDACTED] [REDACTED] [REDACTED]
Strategic Planning Manager
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

[REDACTED]
[REDACTED]

[REDACTED]

#LondonIsOpen

[REDACTED]

From: [REDACTED] <[REDACTED]@aecom.com>

Sent: 24 July 2017 15:44

To: [REDACTED]; [REDACTED]; [REDACTED]@arup.com'

Cc: [REDACTED]

Subject: RE: London Plan IIA and HRA

Hi [REDACTED]

With regard to HRA:

1. Older Peoples Housing – no specific HRA issues identified, other than the broad one of general growth in residential dwellings/population across London
2. Parking – generally positive in HRA terms in that it may discourage private car ownership and thus improve air quality
3. WSE1 (collaboration in the Wider South East) – no HRA issues
4. WSE2 (Growth Areas in Wider South East and Beyond) – this policy appears to essentially be about investment in strategic infrastructure within the initial Strategic Infrastructure Priorities and isn't location/scheme specific beyond the broad areas identified on Diagram A. Individual schemes would need to be considered on their own merits as they came forward. Paragraph 13 makes it clear that '*The focus is on locations which have good or improving public transport access*' which is positive for air quality on vulnerable European sites (such as Epping Forest) and paragraph 16 acknowledges that '*There may not be additional development potential everywhere along these Priorities due to local constraints*', so I think it can be concluded that the policy does not present HRA issues.

[REDACTED]

[REDACTED] Associate Director (Ecology & Habitat Regulations Assessment)

AECOM

Direct dial: [REDACTED] (internal short dial: [REDACTED])

[\[REDACTED\]@aecom.com](mailto:[REDACTED]@aecom.com)

From: [REDACTED]@london.gov.uk]

Sent: 19 July 2017 18:04

To: [REDACTED]; [REDACTED]@arup.com'; [REDACTED]; [REDACTED]

Cc: Jennifer Peters; Richard Linton; Jorn Peters; Elliot Kemp; Andrew Russell

Subject: RE: London Plan IIA and HRA

Hello [REDACTED] and [REDACTED]

One of the outstanding policies for assessment attached: older peoples housing
Any questions- please let me know.

Thank you

[REDACTED]
Principal Advisor- Access and Inclusion
Greater London Authority

From: [REDACTED]
Sent: 18 July 2017/ 11:41
To: [REDACTED] ([arup.com](mailto:[REDACTED]@arup.com)); [REDACTED] ([aecom.com](mailto:[REDACTED]@aecom.com))
Cc: Jennifer Peters; Richard Linton; Jorn Peters; Rachel Smalley; Elliot Kemp; Andrew Russell
Subject: London Plan IIA and HRA

Dear [REDACTED] and [REDACTED]

Please can you assess the following policies

- Parking
- Wider South East x 2

A couple more policies are coming later in the week/ early next for assessment

- Older people's Housing
- Housing supply x 2
- Industrial land (this has already been assessed but has had to change to relate to decisions on housing supply)

I've cc'd relevant policy leads on this email so can you send your assessment to everyone on this list as I am on leave from tomorrow until the 31st July.

Kind Regards

[REDACTED] MRTPI
Strategic Planning Manager
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

[REDACTED]

Please note, I do not currently work on Weds

#LondonIsOpen

[REDACTED]

From: [REDACTED]
Sent: 04 August 2017 17:10
To: [REDACTED]
Subject: RE: Draft London Plan housing supply policies for IIA/HRA

Thanks [REDACTED]

From: [REDACTED] ([REDACTED] [mailto:[REDACTED]@aeom.com])
Sent: Friday, August 4, 2017 3:07 PM
To: [REDACTED] ([REDACTED]@arup.com)
Cc: [REDACTED]
Subject: RE: Draft London Plan housing supply policies for IIA/HRA

[REDACTED]

I do not suggest any rewording for any of these policies driven by HRA requirements. Clearly the actual housing targets pose the potential for effects on European sites and discussion of this is the main aspect of my emerging HRA report. However, based on my initial inspection (and taking into account that none of them allocate actual sites and that TfL expect to see a positive trend in air quality notwithstanding this growth) I do not think there is any need for any of these targets to change in order to protect European sites, subject to the safeguards conveyed by the other plan policies.

Some boroughs (notably Redbridge and Waltham Forest) will need to continue to take account of recreational pressure (on Epping Forest SAC in their case) in delivering growth (and determining the most appropriate locations within their boroughs) but mitigation strategies already exist, or are likely to exist shortly, based on tried/tested models and there is no reason to believe that these levels of growth are inherently undeliverable when European sites are taken into account.

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]
Associate Director (Ecology & Habitat Regulations Assessment)

AECOM

Direct dial: [REDACTED] (internal short dial: [REDACTED])
[REDACTED] [\[REDACTED\]@aeom.com](mailto:[REDACTED]@aeom.com)

From: [REDACTED] ([REDACTED]@london.gov.uk)
Sent: 27 July 2017 17:50
To: [REDACTED] ([REDACTED]@arup.com)
Cc: [REDACTED]
Subject: Draft London Plan housing supply policies for IIA/HRA

Hello [REDACTED] and [REDACTED]

Here are the outstanding draft London Plan housing supply policies on:

- Increasing housing supply
- Small sites
- Monitoring housing targets

If you could provide IIA/HRA comments or assessment as soon as possible that would be very much appreciated.

Happy to explain anything over the phone if necessary.

Regards

[REDACTED]

Senior Strategic Planner

GREATERLONDONAUTHORITY

[REDACTED]

@london.gov.uk

[REDACTED]

#LondonIsOpen

[REDACTED]

From: [REDACTED] <[REDACTED]@aecom.com>
Sent: 29 May 2018 15:18
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: draft new London Plan - HRA

Thanks [REDACTED],

Based on an informal chat with a Natural England officer who was involved I was expecting more comments on the HRA than are in this letter so I am pleased to see there are relatively few!

[REDACTED]
[REDACTED]
Associate Director (Ecology & Habitat Regulations Assessment)

AECOM

Direct dial: [REDACTED] (internal short dial: [REDACTED])
[REDACTED] [aecom.com](mailto:[REDACTED]@aecom.com)

From: [REDACTED]@london.gov.uk]
Sent: 29 May 2018 15:13
To: [REDACTED]
Cc: [REDACTED]
Subject: draft new London Plan - HRA

Hi [REDACTED]

[REDACTED] has asked me to send you the following information

- ☐ Comments received on the HRA– no formal comments were received
- ☐ Natural England's response – attached (HRA comments are in Appendix 1)
- ☐ Proposed amendments (so far) to the consultation draft London Plan - attached

I am also going to have a look at the recommendations in the HRA, NE's comments and the latest version of the policies to see if the comments have been addressed.

Thanks

[REDACTED]
Principal Strategic Planner
London Plan Team
Development, Enterprise and Environment
Greater London Authority

[REDACTED]
#LondonIsOpen

[REDACTED]

From: [REDACTED] <[REDACTED]@aecom.com>
Sent: 09 July 2018 14:21
To: [REDACTED]
Subject: RE: London Plan HRA

Thanks – I was intending to provide you with the updated HRA by 20th July – does that sound OK?

Dr [REDACTED]
Technical Director (Ecology & Habitat Regulations Assessment)
AECOM
Direct dial: [REDACTED] (internal short dial: [REDACTED])
[\[REDACTED\]@aecom.com](mailto:[REDACTED]@aecom.com)

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 09 July 2018 14:20
To: [REDACTED]
Subject: London Plan HRA

[REDACTED]
How are you?

This is the PO you can use for the outstanding balance and for the remaining work this financial year. PO
3101015696

I just wanted to touch base with you in terms of when you will be sending a report to review? I just need to let the
Inspectors know when to expect it.

Thanks

Kind Regards

[REDACTED]
London Plan Manager
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

[REDACTED]
#LondonIsOpen

[REDACTED]

From: [REDACTED] <[REDACTED]@aecom.com>
Sent: 20 July 2018 08:44
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Updated HRA report
Attachments: London Plan HRA for issue.pdf

Hi
Please find attached the updated HRA as a pdf

[REDACTED]
[REDACTED]
Technical Director (Ecology & Habitat Regulations Assessment)
AECOM
Direct dial: [REDACTED] (internal short dial: [REDACTED])
[\[REDACTED\]@aecom.com](mailto:[REDACTED]@aecom.com)

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 19 July 2018 15:32
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Updated HRA report

Please find attached – that is all fine – I’ve just added a couple of changes re the dates on the London Borough plans.

From: [REDACTED] [mailto:[REDACTED]@aecom.com]
Sent: 18 July 2018 11:20
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED]@london.gov.uk>; [REDACTED]@london.gov.uk>; [REDACTED]@tfl.gov.uk>
Subject: RE: Updated HRA report

Thanks [REDACTED]

I have attached the amended version just so you can see the final changes. Can you confirm you have no further comments?

Yes, the intention is that this is a full report including the amendments being accepted once you have confirmed you have no further comments. If the Inspectors would like to see the track changes we can provide those versions.

[REDACTED]
[REDACTED]
Technical Director (Ecology & Habitat Regulations Assessment)
AECOM
Direct dial: [REDACTED] (internal short dial: [REDACTED])
[\[REDACTED\]@aecom.com](mailto:[REDACTED]@aecom.com)

From: [REDACTED] [mailto:[REDACTED]@london.gov.uk]
Sent: 17 July 2018 19:17
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Updated HRA report

Please find attached some very comments on the HRA report and the screening table.

So are you intending on publishing these reports as full reports with the amendments? Also I guess the front of the report still needs to refer to the draft London Plan – as you will be doing a final HRA report to publish alongside on the final Plan?

Kind Regards

[REDACTED] MRTPI
London Plan Manager
Greater London Authority
City Hall
The Queen's Walk

London SE1 2AA

[REDACTED]
[REDACTED]
From: [REDACTED] ([mailto:[REDACTED]@aecom.com])

Sent: 17 July 2018 10:05

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@tfl.gov.uk>

Subject: RE: Updated HRA report

Thanks [REDACTED]

I have attached the updated HRA with changes marked as 'track changes' for ease of reference. The changes are in response to a) the changes to the London Plan (minor), b) Natural England's comments on the HRA and b) the Sweetman ECJ ruling. In order to comply with the latter the report has been split into two parts: an assessment of Likely Significant Effects and an Appropriate Assessment. The conclusions are unaltered.

With regard to the suggested text in point (2) below, I have changed it slightly to read '*In response to the second of these recommendations, the GLA responded that because the Plan was meant to be read as a whole, it was not appropriate that Policy H1 specifically reference potential impacts on Epping Forest SAC as a result of housing targets. Instead it was more appropriate for G6 Biodiversity to explicitly ensure that any impacts on designated sites are assessed in accordance with legislative requirements. In addition, the GLA pointed out that the Plan does not allocate sites; it will be for the relevant borough through their plan making to ensure that any sites allocated take account of possible impacts in relation to mitigation solutions. If implementation of the mitigation strategies highlights that not all housing sites may be deliverable, this will be considered as part of the next London Plan review in relation to assessing potential sites for inclusion within the next London SHLAA*'.
Let me know if you have any comments and I can then finalise for the examiners.

[REDACTED]
[REDACTED]
[REDACTED]
Technical Director (Ecology & Habitat Regulations Assessment)

AECOM

Direct dial: [REDACTED] (internal short dial: [REDACTED])

[REDACTED]
[REDACTED]
[aecom.com](mailto:[REDACTED]@aecom.com)

From: [REDACTED] ([mailto:[REDACTED]@london.gov.uk])

Sent: 17 July 2018 08:56

To: [REDACTED] ([mailto:[REDACTED]@london.gov.uk])

Cc: [REDACTED]

Subject: RE: Updated HRA report

[REDACTED]
I am happy for you to use the slightly amended wording below – obviously you can amend if the context doesn't quite work.

1 - paragraph 2.1.31 states that planning frameworks should include an assessment of any effects on the Epping Forest Special Area of Conservation and appropriate mitigation strategies. The Mayor will also encourage boroughs through his Local Plan conformity role to ensure that these impacts are considered.

2. The GLA responded that because the Plan was meant to be read as a whole, it was not appropriate that Policy H1 specifically reference potential impacts on Epping Forests as a result of housing targets. Instead it was more appropriate for G6 Biodiversity to explicitly ensure that any impacts on designated sites are assessed in accordance with legislative requirements. In addition, the GLA pointed out that the Plan does not allocate sites, it will be for the relevant borough through their plan making to ensure that any sites allocated take account of possible impacts in relation to mitigation solutions. If the mitigation strategies highlight that mitigation solutions are not working, this will be considered as part of the next review in relation to assessing potential sites for inclusion within the next SHLAA.

Thanks

[REDACTED]
[REDACTED]
[REDACTED]
London Plan Manager
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

[REDACTED]
From: [REDACTED] ([mailto:[REDACTED]@aecom.com])

Sent: 16 July 2018 14:20

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED]@london.gov.uk>; [REDACTED]@london.gov.uk>; [REDACTED]@tfl.gov.uk>

Subject: RE: Updated HRA report

Hi

Thanks for this – yes I think it would be useful for us to include a response from the GLA explaining why you haven't addressed those particular points. Could you prepare something I could include, or should I just use the text in the email below?

[REDACTED]
[REDACTED]
[REDACTED]
Technical Director (Ecology & Habitat Regulations Assessment)

AECOM

Direct dial: [REDACTED] (internal short dial: [REDACTED])

[REDACTED]@aecom.com

From: [REDACTED] ([mailto:[REDACTED]@london.gov.uk])

Sent: 16 July 2018 11:33

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Updated HRA report

[REDACTED]
Apologises I didn't get back to you on Friday.

In relation to your points below:

1 - para 2.1.31 - *Planning frameworks should include an assessment of any effects on the Epping Forest Special Area of Conservation and appropriate mitigation strategies.* There is a reference in chapter 2 which deals with more specific parts of London. Boroughs will also be encouraged through the Mayor's conformity role regarding Local Plans.

2. The Plan does not allocate sites, it will be for the relevant borough through their Plan making to ensure that any sites allocated take account of possible impacts in relation to mitigation solutions. If the mitigation strategies do highlight issues – as part of our next SHLAA – these will be part of the discussion with the borough of potential sites that may impact i.e any on the side of the borough closest to Epping. But we feel this is part of the evidence base and methodology of the SHLAA rather than being set in policy for the next revision to the London Plan, Also we'd decide that it was not appropriate that H1 (housing supply) was that specific – so we amended G6 Biodiversity to explicitly ensure that any impacts on designated sites are assessed in accordance with legislative requirements.

[REDACTED]
[REDACTED]
[REDACTED]
London Plan Manager
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

From: [REDACTED] ([mailto:[REDACTED]@aecom.com])

Sent: 13 July 2018 09:43

To: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: Updated HRA report

Hi [REDACTED]

We have more or less completed updating the HRA report. However, in going through the text of the plan we couldn't find where two of our recommendations had been incorporated/dealt with. Could you please point them out? They are:

- Point (1) under heading 7.5.1 regarding Epping Forest SAC recommends that *'The London Plan should encourage the London Boroughs (particularly Waltham Forest and Redbridge and possibly Newham and*

Enfield) to participate as necessary in this strategy [the recreation mitigation strategy being prepared by Epping Forest District Council and partners] that is already being devised'.

- . Point (2) under heading 7.5.1 regarding Epping Forest SAC says '*...the London Plan should acknowledge that Epping Forest SAC, its sensitivity to recreational pressure and the high level of protection it receives represent a factor for the London Boroughs of Redbridge and Waltham Forest that does not exist for most other London boroughs... monitoring of progress with the delivery of these housing targets in parallel with the success of the mitigation solution may trigger a need to revise them [the housing targets for these authorities] in the future. It would be appropriate to reflect this potential need for future revision in the London Plan text'.* The same recommendation is made in point (2) under heading 7.6.1 (Lee Valley SPA).

Both recommendations are then repeated in section 10.1.

Thanks

[Redacted]

[Redacted]

Technical Director (Ecology and Habitat Regulations Assessment)

Environment & Ground Engineering, UK & Ireland

D + [Redacted] internal-short-dial-[Redacted]

[aeom.com](mailto:[Redacted]@aeom.com)

AECOM

Midpoint

Alencon Link

[Redacted] Hampshire RG21 7PP

aeom.com

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Date: 22 September 2017
Our ref: 225100



FAO: [REDACTED],
AECOM
Midpoint
Alencon Link
Basingstoke,
Hampshire
RG21 7PP

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear [REDACTED],

Planning consultation: Draft London Plan - First Draft Habitats Regulations Assessment (HRA)
Location: Greater London Authority (GLA)

Thank you for your consultation on the above dated 04 September 2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The Conservation of Habitats and Species Regulations 2010 (As amended)

First Draft HRA

At this early stage Natural England would have the following comments to make on the draft HRA as supplied.

The main point I think that needs to be made relates to the [Wealden judgement](#) of March this year as this at present isn't mentioned anywhere within the HRA screening document and given its significance for in-combination assessment of the impacts of plans or programmes should form an appropriately important part of this Habitats Regulations Assessment.

Lee Valley SPA & Ramsar

There shouldn't be an over-reliance on the success of Walthamstow Wetlands project before it is fully open and any impacts assessed through post opening monitoring. If there should be impacts demonstrated by the monitoring programme in place then access routes to the site will be reduced as there are agreed mechanisms in place to reduce access (gated pathways). That approach is likely to be fine as part of the Lea Valley's growth where the project has been developed over the years but its use as an argument for other N2k sites not to be affected by recreational disturbance should be used with caution.

We would like to see the additional information which is yet to be provided from the Mayors Transport Strategy as this will help to firm up what exactly is proposed in the way of mitigation for air quality impacts. This strategy is a key element in the process of cleaning up London's air quality so the proposals put forward within the Transport Strategy as well as the Air Quality Strategy and the Environment Strategy should be taken seriously and implemented as quickly as possible.

Recommendations made regarding the addition of the term "sustainable" in section 8.5.1 are welcomed and would help to ensure access isn't allowed unmanaged to cause harm in due course. In section 8.7 it would be useful to know if the London Plan makes mention of the use of package treatment plants and the need to avoid phosphate deposits from these into water courses even if

these types of water treatment aren't often used in London.

Epping Forest SAC

The air quality around this site is a key issue for all of London and particularly the boroughs mentioned which border the site directly. The proposals set out under section 7.5.1 are welcomed and should be taken forward with respect to the policies within the London Plan. The ability to react to reduce housing number targets in response to success rate of mitigation must be included. A mechanism to allow this should be developed so that it can be implemented swiftly if needed.

Under section 7.6.1 the recommendations for the London Plan are again welcomed and should be taken into account by the planners in their development of policies going forward to the first consultations on the draft London Plan in due course. The option to be able to revise housing targets if air quality improvements aren't going to be met and the SAC is under threat of further deterioration is welcomed.

Richmond Park SAC

The report should include reference to poor AQ affecting the trees and grassland on site as these all contribute to the overall site makeup and poor air quality impacting on trees growth could well mean there is less dead wood on site which the Stag Beetle relies upon.

Wimbledon Common SAC

Although it is concluded that no impact will be seen as a result of the various London Plan policies in relation to air quality impacts on the site there are still areas (as stated in the report) which do see higher levels of nitrogen deposition which are exceeding the critical load range for heathland. We feel that there should be some recommendations made to for the London Plan here which are more specific in how air quality impacts could be tackled here.

General comments

Section 10.1 Policy T7 – Aviation makes a valid point regarding the use of the term “environmental costs” and it is welcomed that the suggestion should be put forward to ensure this is amended in order to not fall foul of the Habitats Directive.

The overall screening determination at present that there isn't likely to be any Likely Significant Effect will need to be revised as the plan progresses and more detail is derived from certain other authorities and plans where comment is being awaited (such as from Transport for London). Initially however this determination would appear to be in line with what could be expected however given the Wealden judgement and its impact on in-combination assessment this should be reassessed as the London Plan progresses in order to adhere to the legal implications of the judgement.

There is also mention made of the London Borough of Hartsmere which doesn't exist and is a Borough Council in Hertfordshire, which is listed separately within section 2.3.2, so this would need amending in the next draft.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact [REDACTED]
[REDACTED] For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely,

[REDACTED]
Sustainable Development
Thames Team



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Town and Country Planning

Greater London Authority

NOTICE OF DEPOSIT OF THE PROPOSED DRAFT LONDON PLAN (SPATIAL DEVELOPMENT STRATEGY FOR GREATER LONDON)

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

GREATER LONDON AUTHORITY ACT 1999 (AS AMENDED)

The Mayor of London has prepared a new draft London Plan. These proposals will set a strategic framework for planning in Greater London.

Copies of the proposals and an Integrated Impact Assessment and a Habitats Regulations Assessment are available for public inspection at City Hall, The Queen's Walk, More London, London SE1 2AA free of charge, Monday to Friday 9:00 am to 5:00 pm, until Friday 2nd March 2018.

Representations on these proposals should be sent in writing to:

Sadiq Khan, Mayor of London, Draft London Plan, FREEPOST RTJC-XBZZ-GJKZ, GLA City Hall, post point 18, The Queen's Walk, More London, LONDON SE1 2AA.

Or via email to londonplan@london.gov.uk with 'new draft London Plan' in the subject box or through online consultation tool on www.london.gov.uk/new-london-plan

And must be received no later than 5:00 pm on Friday 2nd March 2018.

The Mayor is not required to consider any representations received after this date.

Further information is available on the GLA website at: www.london.gov.uk/new-london-plan