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Mr. Sadiq Khan
The Mayor of London
London Plan Team
Greater London Authority
City Hall
London SE1 2AA

2nd March 2018

Dear Mayor Khan,

DRAFT NEW LONDON PLAN

London Wildlife Trust welcomes the opportunity to comment on the Mayor's draft New London Plan. London Wildlife Trust, a nature conservation charity founded in 1981, works to secure a capital rich in wildlife, that can help make the city a better place for Londoners to live, work and play. Our vision is of a living landscape, where we work with others to restore, recreate and reconnect wildlife-rich places across the city, to create a dynamic and functioning ecological network for the benefit of people and wildlife. We have a long-standing interest in the planning frameworks to protect the capital's ecological infrastructure, from undertaking the initial London-wide survey in 1984-85 to establish London's Sites of Importance for Nature Conservation, to our current work with house-builders to establish nature-friendly developments.

We support the aspirations of including the target for more than 50% of London to be green by 2050, and the commitment to becoming a zero-carbon city by 2050. Given the scale of growth proposed, it is essential that the Mayor demonstrates leadership in a more ambitious approach to protecting and enhancing the city's environment; this will be critical to making London liveable, better resilient to climate change, as well as sustaining the capital's ecological assets.

Overall comments

The Trust welcomes the draft New London Plan's commitment to Good Growth, and for commitments to the protection of strategic green space, including the Sites of Importance for Nature Conservation, (Metropolitan) Green Belt, Metropolitan Open Land, and Regionally Important Geodiversity Sites.

Nevertheless, given the scale of development planned it is essential that the New London Plan takes a spatial approach to ensure development is directed to the least environmentally damaging locations and opportunities are taken to plan for biodiversity at a landscape scale.

We welcome the commitments to help increase the amount of green cover in London to 50%, but have concerns about the how the quality, distribution and connectivity of that new cover will be delivered. We would like to see a more explicit reference to net biodiversity gain made within the Plan, in line with the National Planning Policy Framework¹.

¹ NPPF, Para 9: *Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):* • moving from a net loss of bio-diversity to achieving net gains for nature; [our emphasis]

The draft Plan does not currently provide a strategic, spatial framework for biodiversity protection and enhancement and underplays the importance of biodiversity. Biodiversity is a key stock of natural capital, underpinning a variety of benefits to people as well as having an intrinsic value and we believe it is critical that biodiversity is protected before considering and trading off ecosystem service benefits. We recommend that there should also be a clearer indication as to how the NPPF's requirement to identify and map out ecological networks will be met, and how landscape-scale enhancements to the natural environment will be set out in the Plan (and how borough Local Plans will help deliver this).²

The New London Plan should therefore take a more ambitious approach to biodiversity and robustly set out the strategic, spatial framework for London boroughs to follow. Whilst there are opportunities to address this with the proposed review of the All London Green Grid (ALGG, under Policy G1), we believe that the ALGG serves a slightly different function (the two would need to be integrated). There is a real risk that without this, the scale of development planned could significantly adversely impact on the ecological assets of London and neighbouring districts.

We recommend that some spatial illustrations of the city's greenspace, including wildlife sites (SSSIs, SINCs, etc.), needs inclusion in Chapter 8 (the only maps are one on geodiversity sites and the waterways network (Chapter 9)).

We recognise the New London Plan's objective to deliver housing demand through multiple small-scale developments, primarily in the suburbs and in and around town centres. We believe that whilst there are some good environmental reasons for this, without explicit requirements and good guidance there is likely to be a net loss to greenspace and a dilution of the connectivity of greenspaces for sustaining biodiversity where this occurs.

We believe that the policies regarding water use, water management and waterbodies need to be strengthened. The loss of the term Blue Ribbon Network as an overarching framework (well understood by many outside the planning world) requires re-consideration.

We are concerned that the policy around air travel and airports has been weakened, and there is no reference to Heathrow's potential expansion will lead to significant land-take of greenspace and natural habitats.

We set out our **comments in detail** below (pages 3-23). Proposed amended text (all italicised) is in *red*, proposed deletions are ~~struck through~~.

London Wildlife Trust will work with the Mayor and Greater London Authority to support development of an ambitious New London Plan that places the protection and enhancement of the natural environment at its heart and to ensure its effective implementation. If you wish for any further clarity on these points, please do not hesitate to contact me.

 Yours sincerely,

Mathew Frith
Director of Conservation

² NPPF, Para 117. *To minimise impacts on biodiversity and geodiversity, planning policies should:* ● plan for biodiversity at a landscape-scale across local authority boundaries; ● identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;

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Chapter 1: Planning London's Future (Good Growth Policies)

Planning for Good Growth

We welcome the Good Growth policies in principle, and the recognition that the protection and provision of a high quality natural environment, including flourishing biodiversity habitats, clean air and water, and accessible greenspace are critical to the wellbeing of London, and her residents, workers and visitors.

Nevertheless, London's growth has the potential to place significant strain on the environment (including water security, biodiversity loss, soil depletion) and on environmental infrastructure, in the capital and surrounding counties. Better planning for environmental infrastructure requirements is essential.

We support the Mayor's aims for a more efficient and resilient London. In delivering those aims, we recommend that the Mayor should consider the London Plan's contribution to delivering the Government's 25-year plan for the environment.³

Policy GG2: Making the best use of land

We welcome and support Policy GG2 and the commitments to protect existing nature conservation sites, as well as Green Belt and MOL. However, we recommend that an overall commitment to securing net gain for biodiversity in line with the NPPF's aim to "achieving net gains for nature"⁴ is explicitly embedded in this policy and that the focus of brownfield land needs to follow NPPF's recognition of the high environmental value of some brownfield land.⁵ We recommend amending Part D to:

D Protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening in order to secure net biodiversity gains.

Paragraphs 1.2.1 to 1.2.8 make no reference to the multiple non-human populations we share our city with, and the likely impacts of under-planned growth.

We would hope that explicit reference to securing net biodiversity gain (different to making London 50% green) in para 1.2.6:

1.2.6 As London develops, the Mayor's Good Growth by Design programme – which seeks to promote and deliver a better, more inclusive form of growth on behalf of all Londoners – will ensure that homes and other developments are of high quality. Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering 50 per cent green cover and net biodiversity gain across London, will be important to help London become a National Park City.

Policy GG3 Creating a healthy city

We welcome and support this policy, but suggest Part E is amended to:

E Plan for improved access to green spaces and the provision of new health-benefiting green infrastructure.

In para 1.3.3 there needs to be stronger reference to quality of greenspaces, as this has a relationship to their ability to contribute to health and wellbeing.

³ HM Government, *A Green Future: Our 25 Year Plan to Improve the Environment*, January 2018.

⁴ NPPF, paragraph 9.

⁵ NPPF, paragraph 111: *Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.*

1.3.3 The causes of London's health problems are wide-ranging. Many of London's major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access and quality varies widely across the city. Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts. A healthy food environment and access to healthy food is vital for good health. Good planning can help address all of these issues.

Policy GG4 Delivering the homes Londoners need

We recognise the need to plan to build a higher number of homes. However, without careful planning and design this has the potential to place further strain on London's natural environment. We would wish to work with the Mayor to ensure that opportunities to protect and improve the environment, and to mitigate any risks, are taken in delivering new homes on both on small sites and major developments. To this effect we have already contributed to the London Assembly Housing Committee's recommendations to this effect.⁶

We are, however, concerned that there appear to be no commitment to environmental standards for design and construction. Part C needs to be amended to:

C Create mixed and inclusive communities, with good quality homes that meet high standards of environmentally sustainable design and provide for identified needs, including for specialist housing.

Policy GG5 Growing a good economy

This policy and supporting paras seems to assume that this can all be achieved without environmental damage. Nevertheless we consider that London's natural environment makes a significant contribution to the capital's economy, and its attractiveness to business. This is recognised in the Mayor's draft Environment, and Economic Development Strategies, and the Mayor's aim to introduce a Natural Capital approach.

We therefore would propose an additional Part H to Policy GG5 is added along the lines of:

H: Ensure that London's economy contributes to the protection and sustainable management of the natural environment, and secures net gains in its quality and quantity.

Policy GG6 Increasing efficiency and resilience

This policy and supporting paras do not make any reference to the role of green infrastructure and natural water systems in helping make the city more resilient to impacts from climate change and other severe natural events. We suggest amending Part B to:

B Ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, and avoiding contributing to the urban heat island effect. Ensure green & blue infrastructure is protected and created to enhance resilience against a changing climate.

⁶ London Assembly, [At Home with Nature Encouraging biodiversity in new housing developments](#), January 2017

In para 1.5.3 the phrase, ‘*protecting against flood risk*’ is misleading, in that it implies flood risk can be reduced to zero; should be amended to “*minimising flood risk.*”

In para 1.5.5 we suggest that there should be explicit reference to the role of a high quality natural environment enhancing the extent and quality of green infrastructure in securing a zero carbon city, and in improving London’s resilience. This would support the Plan’s policies in Chapter 8.

Chapter 2: Spatial Development Patterns

Introduction

We note the Mayor’s growth proposals. The identification of growth corridors, and the clustering of Opportunity Areas (OAs) encourages a strategic approach to be taken to identify integrated solutions to protecting and enhancing the existing natural environment in these OAs, and delivering further environmental infrastructure.

However, we consider that the environment is currently under-represented in the policy objectives for the growth corridors and Opportunity Areas (plus there is some inconsistency as to when and where it is referenced). This should be further developed across this Chapter to better integrate it with the objectives of the policies in Chapters 8 and 9.

We welcome the reference under para 2.0.2 on the critical contribution to the 47% green and blue space coverage of Greater London. However, Green Belt and MOL are not the only designations of strategic importance, and they serve more functions than just providing open-ness and preventing sprawl. We recommend the following amendment.

*2.0.2 London’s green and open spaces are a vital part of the capital. Its parks, rivers and green open spaces are some of the places that people most cherish and they bring the benefits of the natural environment within reach of Londoners. London’s **Green Belt, and Metropolitan Open Land** and protected wildlife site designations (see Chapter 8) serve to protect these strategically important open spaces, prevent urban sprawl, help provide resilience and focus investment and development on previously developed land.*

The Key Diagram (figure 2.1)

We are concerned that environmental capacity and infrastructure is not provided the same profile in the Key Diagram (nor in the subsequent text in this chapter). Whilst we recognise that it is not possible to map all environmental, social and economic factors on the Key Diagram, there are environmental determinants of growth potential (such as water security, flood risk profile), which require appropriate recognition and mapping later in the Plan.

Growth Corridors and Opportunity Areas

Policy SD1 Opportunity Areas

Opportunity Areas should also seek to deliver environmental benefits as well as economic and social benefits, as many will offer good opportunities to plan strategically for the enhancement and better connectivity of ecological corridors, for example the SINC network (see Policy G6) and secure net gains for biodiversity. Whilst this will be more challenging in some Opportunity Areas than others we recommend that an over-arching principle applies.

We recommend an additional clause is added in Policy SD1 Part B:

B: Boroughs, through their development Plans and decisions should

X) Clearly identify opportunities to restore and enhance the protected wildlife site and ecological network within and around Opportunity Areas.

Bakerloo Line Extension

Old Kent Road OA

In para 2.1.15 we welcome the recognition for “additional public open spaces the area will require as it evolves.”

New Cross/Lewisham/Catford OA

In para 2.1.16-18 there should be reference to the River Ravensbourne corridor that flows between Catford and Lewisham, much of it close to the town centres. Some stretches of this have benefited from enhancements over the past 20 years (e.g. at Ladywell Fields), and we would hope the Plan encourages future development to not only respect and protect the area’s riparian assets but also help secure further enhancements to it to help with climate change and flood risk resilience, biodiversity and people’s contact with nature.

Crossrail 2

Crossrail 2 South/ Kingston OA

In para 2.1.24 there is reference to the future “potential to accommodate growth in the following areas: *Berrylands and Hogsmill Valley.*” We are concerned that this is an important ecological corridor through which the Hogsmill River runs through, which is currently failing status under the European Union’s Water Framework Directive. We would hope the Plan encourages future development to not only respect and protect the Valley’s ecological integrity and riparian assets but also help secure further enhancements to it to help with climate change and flood risk resilience, biodiversity and people’s contact with nature.

Crossrail 2 North/ Lee Valley OA

We note that para 2.1.31 references the Epping Forest SAC, but not the Lee Valley SPA/Ramsar, although it states: “*The Planning Framework should also protect and improve sustainable access to the Lee Valley Regional Park and reservoirs.*” We recommend that this is amended to:

The Planning Framework should also protect and improve sustainable access to the Lee Valley Regional Park and reservoirs, and ensure links through to Hackney Wick and the Lower Lea Valley. Planning frameworks should include an assessment of any effects on the Lee Valley Special Protection Area and Ramsar site, and Epping Forest Special Area of Conservation and appropriate mitigation strategies.

Thames Estuary North and South

We are concerned this makes no reference to the ecological importance of the estuary, floodplain habitats and its hinterland (for example as an international migratory route for birds and fish), some of which is of national and international ecological importance. These assets not only need to be protected but also better connected to provide the ecological resilience in the face of planned development pressures. The tidal Thames (downstream from Teddington) is a candidate Marine Conservation Zone under the Marine & Coastal Access Act 2009, and part of the estuary within Greater London is part of a Nature Improvement Area.

There should be explicit reference to integration with the emerging South East Marine Plan being developed by the Marine Management Organisation (see Policy SI14).

Bexley Riverside OA

Similarly this area contains some of the remaining floodplain grazing meadows (UK Priority Habitats) on the south side of the Thames, with regionally important populations of water vole. The Planning Framework (Para 2.1.540 should also ensure that there is no net loss of biodiversity.

High Speed 2 / Thameslink

Old Oak Common OA

We recognise the work to date under para 2.1.57, but still have significant concerns on the likely environmental impacts on the ecological integrity of Wormwood Scrubs. This is recognised in the OPDC's Environmental Standards Study – "*Insufficient onsite provision of public open space is also likely to put unacceptable pressure on Wormwood Scrubs*"⁷ - but as yet there not a strong enough policy direction within the OPDC revised draft Local Plan (under Policy EU2: *Urban Greening and Biodiversity*) to address this.

Heathrow/Elizabeth Line West

We welcome the reference under Para 2.1.62 to environmental improvements. Planning frameworks should include an assessment of any effects on the South West London Water Bodies Special Protection Area and appropriate mitigation strategies.

Policy SD2 Collaboration in the Wider South East

We welcome the recognition of the relationship of London with the surrounding counties. The extent and quality of land in the Wider South East is imperative to the ecological function of land within London and helps to sustain populations of species further in (through complex population dynamics). However, the adequate protection and provision and viable ecological corridors – as well sufficient tracts of land – are required to ensure this can be sustained – and in places improved.

We therefore recommend adding a specific reference in Part E along the lines of:

*E The Mayor will work with WSE partners to find solutions to shared strategic concerns such as: barriers to housing and infrastructure delivery (including 'smart' solutions - see also paragraph 9.6.7); factors that influence economic prosperity; the need to tackle climate change (including water management and flood risk); improvements to the environment (including air quality, **green infrastructure and ecological networks**) and waste management (including the promotion of Circular Economies); wider needs for freight, logistics and port facilities; and scope for the substitution of business and industrial capacity where mutual benefits can be achieved.*

Town centres

We support the principle of the town centres first approach (para 2.8.1), including the redevelopment of retail and leisure parks to deliver housing intensification (para 2.8.3).

Strategic and local regeneration

Policy SD10 Strategic and local regeneration

We welcome the reference to 'locally-sensitive policies' (Part C). However, we suggest that specific reference to natural spaces is made within the appropriate para 2.10.6, as these are usually high valued by people;

⁷ OPDC *Environmental Standards Study*, Local Plan Supporting Study (Executive Summary, June 2017)

2.10.6 The Areas for Regeneration are home to many established and varied communities, and there is likely to be a strong sense of place, local identity, and character that is reflected in the buildings, streets and spaces in the area, the lives of the people that live there and the activities that take place. Local Plans, Opportunity Area Planning Frameworks, and regeneration strategies should identify, protect and promote the **places and spaces that are particularly valued by local communities**, including cultural venues, heritage assets, community facilities, parks and greenspaces, and social infrastructure, as well as creating new spaces for people to enjoy.

Chapter 3: Design

Policy D1 London's form and characteristics

We welcome the broad principles of Policy D1 although it underplays the role of the natural environment in shaping London's form and character and is weak on its commitment to delivering the highest standards of sustainable design and construction. We recommend it makes stronger reference to ecology and the potential impacts to and opportunities to benefit the local natural environment, and recognise this is referenced under para 3.1.4 (*Maximising urban greening*). However, we suggest that this needs to be better embedded in the policy with the following amendments to Part B:

B Development design should:

3) aim for the highest sustainability standards

4) respect, enhance and utilise the heritage assets, ~~and~~ architectural features and natural environment that make up the local character

5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water and secure ecological enhancements

Policy D2 Delivering good design

We welcome and support this policy in principle. However, under Part A there needs to be explicit reference to the ecological and biodiversity context; this should follow from the NPPF requirement (para 117) for Local [Development] Plans to map ecological networks.

A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area based strategies, which covers the following elements:

6) ecological and open space networks, green infrastructure, and water bodies

Policy D6 Optimising housing density

We welcome Policy D6's commitment to make most efficient use of land. However, we recommend that the explanatory text could be added to, to set this policy in context with other policy requirements in Chapters 8 and 9. This would clarify and help integrate the environmental objectives of the Plan which will contribute to the design-led approach to optimising density.

Policy D7 Public realm

We welcome and support Policy D7, particularly the points under Part H.

Policy D8 Tall buildings

We welcome the factors that need to be considered in the future construction of tall buildings, under Policy D8. London stands on major bird migratory routes and the growth of buildings (exacerbated by their density and night-time lighting) has impacts on birds, especially in mid-Spring and early autumn, as well as those close to large water-bodies (which may be designated for their importance to those birds). We welcome the recognition of this in para. 3.8.8 (other impacts), however, we recommend that Policy D8 is strengthened under Part C (Impacts):

Impacts

C The impacts of a tall building can be visual, functional or environmental. All three elements should be considered within plan-making and in deciding development proposals:

3) Environmental impact

d) Location and design should avoid adversely impacting flight patterns of and causing fatalities to birds close to water bodies and/or on major migratory routes across London (e.g. the Lee Valley).

Policy D9 Basement development

We welcome and support this policy; evidence suggests it has contributed to the loss of garden greenspace and trees in various parts of inner London. In para 3.9.5 we support the inclusion of “*Protection for trees*” as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.

Chapter 4: Housing

Provided housing is located in the right place and planned with nature in mind, housing can be delivered to minimise its harm to wildlife and secure benefits for biodiversity. We strongly support the Government’s 25 Year Environment Plan’s commitments to ensure that “*new development will happen in the right places, delivering maximum economic benefit while taking into account the need to avoid environmental damage...*” and achieve ‘*high environmental standards for all new builds...*’ (p35). The Wildlife Trusts have also set out our own view as to how best this may be achieved.⁸

London Wildlife Trust’s work with Berkeley Homes at Woodberry Down, Kidbrooke Village and Southall Waterside is demonstrating how high density new housing can be built with nature in mind. Woodberry Wetlands, developed by the Trust (with support from Berkeley Homes, Thames Water and Hackney Council) has informed the regeneration of Woodberry Down, and provides a wildlife rich space for residents and other local people to enjoy free of charge.⁹ It is featured in the (previous) Mayor’s Green Infrastructure Taskforce *Natural Capital* report as a case study.¹⁰

Policy H2 Small sites

We recognise the policy approach behind Policy H2 to focus development within the curtilage of the Green Belt and help prevent the environmentally damaging impacts of urban sprawl. We welcome the recognition of the potential impacts of developing small sites on biodiversity and hence support the inclusion of clause E: “*Where there is no such design code, the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an*

⁸ www.wildlifetrusts.org/living-landscape/planning/housing-and-nature

⁹ See: www.woodberrywetlands.org.uk/

¹⁰ www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/green-infrastructure-task-force-report

unacceptable level of harm to [...]biodiversity or [...]that outweighs the benefits of additional housing provision."

[The issue of concern is the evaluation that needs to be provided to demonstrate what biodiversity maybe impacted by such proposals (both immediate and accumulative), and what determines that this may or may not outweigh the "additional housing provision".]

We welcome under point B the intention of the Mayor to set out design principles for small housing developments (para. 4.2.6), and recommend that biodiversity conservation principles need to form an integral part of this.

We welcome the specific reference to the impacts of biodiversity under para 4.2.9 (green space), although 'biodiversity' needs clarification here; it is not the same as green cover (as implied), and developers must have regard for protected wildlife and sites in the development process as per NPPF policy. There are some boroughs which will rely significantly on small sites to meet their housing targets, but which may also have, for example, an existing deficit of access to natural green space. Whilst small sites will make an important contribution to housing delivery, they often contribute to boroughs' stock of locally accessible open space and wildlife habitats, and it may be difficult to balance their loss. Therefore we recommend that this should be amended to:

4.2.9 Loss of or damage to existing biodiversity and/or green space, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage and/or specific biodiversity needs, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. Loss of any public green space will be mitigated (or if needs be, compensated for) with alternative accessible sites of at least equal functional quality.

Under point E, we note the presumption in favour of development on small sites, and that in the absence of a design code, the presumption means approval unless it can be demonstrated that the development would give rise to unacceptable harm. However, it may take time for all boroughs to devise local design codes, and to apply these through Local Plans. This would leave a policy 'gap, meaning small sites would be vulnerable to development proposals which did not demonstrate 'good design' principles as provided in the Plan.

Policy H10 Redevelopment of existing housing and estate regeneration

This policy promotes the intensification of existing housing estates; whilst under para 4.10.2 there is a recognition that 'physical environmental' improvements can be secured through regeneration we are concerned that this can also lead to net losses of open green space (as well as trees and wildlife habitats) often in areas of existing poor greenspace provision. The management of these open spaces has often led to them being of poor quality (and use) and negative perceptions, and hence vulnerable to loss.

We recommend a minor amendment to para 4.10.2:

- 4.10.2 The aims of an estate regeneration project will typically fall into three broad categories. These are:*
- maintaining good quality homes*
 - maintaining safe and good quality homes*
 - improving the social, economic, ~~and~~ physical and natural environment in which homes are located*

There is the need for better approaches to estate landscape design and management to better benefit residents and to help secure net gains in greenspace quality – the work and guidance of Neighbourhoods Green¹¹ should inform the Mayor's proposed Good Practice Guide.(para. 4.10.3).

Chapter 5: Social Infrastructure

Policy S1 Developing London's social infrastructure

We welcome and support Policy S1, with the specific reference in para 5.1.1 to the role of green infrastructure as a key component of social infrastructure, and indeed can be the primary focus for it, such as nature reserves, allotments or community gardens.

Policy S3 Education and childcare facilities

We welcome the recognition for the need to incorporate outdoor space and for facilities to be next to parks and green spaces, and that this is supported in para 5.3.10: "*Where possible, natural features such as trees, greenery and spaces for food growing should be incorporated into playgrounds and school sites, recognising both the health and educational benefits these can provide.*" However, we suggest these clauses are not strong enough in designing in a more holistic approach to ensuring such facilities maximise the benefits of greenspace. We suggest these clauses are amended to:

B Development proposals for education and childcare facilities should:

8) ensure that facilities incorporate suitable, accessible outdoor space **and green infrastructure**

9) locate facilities **to be as safely accessible to** ~~next to~~ parks or green spaces, ~~where~~ **as** possible

Policy S4 Play and informal recreation

We welcome and support Policy S4, especially in the recognition to incorporate green infrastructure (supported in para 5.4.3 (formal play provision)), although clause B2d) could be better strengthened to:

B Development proposals for schemes that are likely to be used by children and young people should:

2) for residential developments, incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that:

d) incorporates trees and/or ~~other forms of~~ **naturalistic** greenery.

Policy S5 Sports and recreation facilities

We support Policy S5 in principle, given recognition that such facilities can, without sensitive design and location, can cause adverse ecological impacts; we welcome the inclusion of clause B3) and Part C).

However, given the rise in the number of artificial pitches (as set out in para 5.5.2 *Current provision of [...] artificial grass pitches (AGPs) [...] is not meeting demand...*) being installed we remain concerned that the accumulative impacts of this – for example on surface water management and biodiversity – has not been recognised. In our view AGPs should be treated as contributing to a net loss of greenspace and their installation needs to be mitigated for that loss of green space in any sports development proposal. We recommend a specific clause under Part B to this effect is added:

¹¹ www.neighbourhoodsgreen.org.uk/

B Development proposals for sports and recreation facilities should:

5) ensure that there is no net loss of the environmental functions of green space through the installation of artificial grass pitches

Policy S7 Burial space

We support Policy S7, and welcome the reference to burial spaces and the broader aims for green infrastructure and the natural environment in the London Plan (para 5.7.4). Many existing cemeteries and graveyards are also designated Sites of Importance for Nature Conservation, and so the encouragement of the re-use of burial space needs to be qualified so that no net loss or damage to SINCs occur through this policy.

Chapter 7: Heritage and Culture

Policy HC2 World Heritage Sites

We support Policy HC2 in principle and welcome the inclusion of setting and buffer zones.

We welcome in para 7.1.2 the fact that historic hedgerows and ancient woodland included in the list of heritage assets, and recommend that veteran and ancient trees are added.

We would recommend that specific reference is made (perhaps within paras 7.2.1.-6) to Darwin's Landscape Laboratory (DLL) which is still a candidate WHS application, and would hope that provision for the appropriate protection of this heritage landscape are considered by the Mayor in the longer term.

Policy HC3 Strategic and Local Views

We welcome and support Policy HC3.

Policy HC6 Supporting the night-time economy

We are concerned that this policy and its supporting paragraphs suggests there are no environmental impacts for developing further the 24-hour economy. Para 7.6.10 suggests there are opportunities to further the external economy "to ensure that the city can be enjoyed at night to its fullest.." and yet doesn't address how the impacts on nocturnal biodiversity or to protect dark skies within the city. We recommend that a specific clause is added in Policy HC6 and reference is made to this in the supporting paragraphs, along the lines of:

B In Development Plans, town centre strategies and planning decisions, boroughs should:

7) ensure that night-time economy activities do not cause adverse environmental damage (e.g. noise, light pollution) through appropriate location, design, and timing.

New para

Night-time events can cause disturbance and/or damage to biodiversity, such as bats, if inappropriately designed, located and/or managed. Activities planned on or adjacent to Sites of Importance for Nature Conservation should take account of likely impacts and appropriate measures should be taken to minimise impact, including if necessary undertaking protected species assessments in advance. The potential presence

of bat roosts in buildings or trees should also be considered – and if needs be surveyed for - on any site considered for nocturnal activity; licencing from Natural England maybe required if found to be present to ensure legal requirements are met.

Chapter 8: Green Infrastructure and Natural Environment

The Mayor's commitment to increased greening is welcome, and overall we support the objectives of the policies within this chapter. The Plan should make greater reference to the importance of the quality as well as the amount of green space.

The New London Plan should set out explicit policy statements for **securing net biodiversity gain**, including commitments to deliver wildlife-rich green spaces to help sustain and enhance biodiversity and provide opportunities for people to connect with nature.

There are also some questions over clarity and consistency across the policies – both within this chapter and across the rest of the Plan.

The New London Plan should also provide a spatial framework for biodiversity, identifying and mapping opportunities to strengthen the connectivity between the SINC network and wider habitats of conservation importance. It is essential the Plan is also underpinned by comprehensive and up-to-date maps of the SINC network and priority habitats; this is currently very variable across London with some boroughs' data over 10 years' old.

If these policies can be strengthened to this effect then together – along with other relevant policies within the Plan - these have **potential to support the Government's 25 Year Environment Plan's focus on natural capital as key to underpinning economic growth**, and its intention that new development should result in 'net environmental gain' (and the NPPF's objectives of "*achieving net gains for nature.*")

One issue of concern is, compared to some of the other chapters, there is only one map – for geodiversity (figure 8.1). We would have expected the Plan to feature at least a number of maps that show

- Metropolitan Green Belt (based on a current adopted Local Plan maps)
- Metropolitan Open Land (ditto)
- Sites of Importance for Nature Conservation – inc. SPAs, SACs, SSSIs (based on GiGL data)
- Areas of Deficiency of access to nature (ditto)

We believe that the lack of visual illustration of the strategic spread of these environmental assets serves to undermine the recognition of their importance, and suggest that consideration is given to their inclusion.

Policy G1 Green infrastructure

We support Policy G1 in principle, but it would benefit from a clear and comprehensive definition of 'green infrastructure' which also aligns with some of the other terminology and table featured in this chapter. It does not reflect the scale of ambition set out in the Draft London Environment Strategy.

Under Part B we suggest that broader climate change objectives should also be referenced:

B Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, climate change resilience, flood management, health and wellbeing, sport and recreation.

We also are concerned that under Part C that protection and enhancement of GI needs explicit reference with a new clause, along the lines of:

C Development Plans and Opportunity Area Planning Frameworks should:

1) identify key green infrastructure assets, their function and their potential function

2) seek to protect and enhance the most important green infrastructure assets for their functions through appropriate policies and proposals

3) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

We welcome and support the commitment to review and update the ALGG SPG (para 8.1.3), which would also be an opportunity to meet the NPPF requirement for Local Plans to produce maps of ecological networks.¹²

Policy G2 London's Green Belt

We welcome and support Policy G2, and the intention of the Mayor to find means to improve the multi-functional quality of the Green Belt and people's access to it. However, we recognise that this is likely to place increased pressure on brownfield sites towards the centre of the city. The Mayor should provide guidance on when a brownfield site is of high environmental value and ensure that all brownfield sites being considered for development are supported by an up to date ecological survey and assessment, and if appropriate set out mitigation to address loss of or damage to biodiversity.

We also recommend that there needs to be an explicit link here to the NPPF requirement to map ecological networks (NPPF para 117), for which the Green Belt both within and outside Greater London is a critical component in terms of existing and potential ecological value.

Policy G3 Metropolitan Open Land

We have some concerns that this policy is weaker than that within the current London Plan (2015), in that it provides a loophole for land swaps – and that newly 'designated' MOL needs to meet only one of the criteria set out in Part D. Clause D4 does not add anything to the criteria as currently written, as an area of land that "*meets one of the above criteria*" qualifies as MOL even if it doesn't form part of a strategic corridor.

Policy G4 Local green and open space

We support Policy G4 in principle, but believe it could open the door to net loss of green space – as the implicit suggestion in part B of the policy is that loss outside areas of deficiency is vulnerable to 'needs assessments'. There is no commitment to protect all green space, plus the terms in the policy don't align with the definitions in Table 8.1 (see comments below). We recommend that the policy should explicitly

¹² NPPF para 117: *To minimise impacts on biodiversity and geodiversity, planning policies should: plan for biodiversity at a landscape-scale across local authority boundaries; identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*

aim to secure a net gain in greenspace that chimes with the objective set out in para 8.4.3 (new provision or improved access).

We therefore suggest that the part B of the policy is amended to include a commitment to secure net gains:

B Boroughs should secure net gains in quantity and quality of publically accessible green space. The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.

Para 8.4.2 should include reference to Biodiversity Action Plans, in order to ensure that the broader strategic and local ecological considerations are embedded:

8.4.2 Boroughs should undertake a green and open space needs assessment to inform their green infrastructure strategy (drawing from existing strategies such as play, trees ~~and~~ playing pitches, and Biodiversity Action Plans).

Table 8.1 raises questions as to how this fits in with definitions of green infrastructure as well as land designated as MGB, MOL, SINC etc.? Arguably, being based on purely spatial standards, the classification does not really take account of the multi-functional benefits, the range of primary purposes of open space, or connective-ness of sites. For example, it refers to parks from Regional to Pocket, although the description may include everything from Epping Forest to Mabey's Meadow.

Policy G5 Urban greening

We support Policy G5 in principle, but it is not clear exactly as to where this applies. The Urban Greening Factor (UGF) only appears to apply to major development despite the strong emphasis for housing provision on small sites within the Plan. Whilst paragraph 4.3.9 of Chapter 4 makes provisions for no net loss of green cover for development on small sites, we recommend that this policy is amended so that development on small sites also contributes to a **net gain in green cover wherever possible**. It appears to assume that no existing habitat is present, as neither the policy nor the UGF take account of existing habitats.

Whilst we welcome the inclusion of the UGF its successful application will be dependent on its interpretation. There is a danger that it creates a ceiling rather than a floor for provision by developers – it must not undermine boroughs' ability to secure more than baseline provision for a site. There are some aspects which would benefit from greater explanation; for example extensive green roof scoring higher than flower-rich perennial planting, and the comparatively low score for hedges. It needs further clarity and explanation to avoid loss or damage to biodiversity.

Some of the references in Table 8.2 ((Urban Greening Factors) suggest that tighter guidance is called for (e.g. ground cover plants, references a list that includes species listed on Schedule 9 W&C Act 1981 – as the purpose of the list is domestic, whilst the UGF application would be much wider). We would expect explicit reference to appropriate habitats and species relevant to the area of London – in which the application is being determined, for example as listed in Biodiversity Action Plans.

Policy G6 Biodiversity and access to nature

We welcome the general aims of Policy G6 but we remain concerned that, as currently drafted, it is passive and **will not secure net gain for biodiversity** let alone drive no net loss in London. There are a number of weaknesses that undermine its objectives, and which do not assist in meeting the Mayor's commitments to securing net gains in greenspace and greater protection for wildlife sites:

- It implies in part A that biodiversity is only found in SINC's rather than across Greater London;
- There is no reference to securing no net loss, let alone seeking to secure net biodiversity gain;
- Part A should require London boroughs to take a strategic spatial planning approach to biodiversity and to commit to securing biodiversity net gains¹³;
- Reference under Part B to green corridors is not referenced anywhere else outside this policy, nor how this aligns with NPPF objectives regarding ecological networks;
- We are unsure what the reference in clause B3 to "*habitats of particular relevance in an urban context*" means, especially bearing in mind that significant areas of London are not urban;
- Part B should make an explicit reference to requiring the availability of a up to date evidence base to inform policy and planning decisions in in line with the NPPF¹⁴;
- Part C appears to rule out off-site compensation; if this not viable where then? Clause C3) requires better legibility.
- We recommend that planning applications that are on or adjacent to Sites of Metropolitan Importance or irreplaceable habitats (e.g. ancient woodland) outside SMIs are added to the categories that must be referred to the Mayor.

The New London Plan must take a more **ambitious approach to protecting and restoring nature** to better reflect the intrinsic importance of biodiversity and its benefits to society.

We are concerned that the policy does not adequately distinguish between **legally protected wildlife sites** (SPAs, SACs, Ramsar sites, SSSIs, National Nature Reserves, and Local Nature Reserves) and **Sites of Importance for Nature Conservation** (SINC's) which sit below nationally and internationally designated sites and comprising Sites of Metropolitan, Borough and Local Importance for Nature Conservation. SSSIs are subject to a statutory designation, selected using clear guidelines against which they must be deemed sites of national importance to qualify for designation, and there are legal controls on what activities can be allowed within them.¹⁵

As drafted, Policy G6 potentially conflates SINC's with internationally important sites (SPA, SACs and Ramsar sites) and nationally important sites (SSSIs and NNRs), and could lead to confusion although all are a material planning consideration. The general principle of avoiding damage and seeking to conserve and enhance wildlife applies to all sites (statutorily protected sites and SINC's), however, these sites are subject to different levels of legal and policy protection (for example, international sites also benefit from the provisions of NPPF para 119) and it is important this is reflected. The Plan should consider having a separate section on legally protected wildlife sites (SSSIs, SPAs, SACs, Ramsar sites).

There is also a need to strengthen the rigour of policy to address weaknesses in the development control process. There is evidence that planning applications are being determined on a disproportionately poor

¹³ As demonstrated by the latest iteration of the New Southwark Plan (2018).

¹⁴ NPPF para 165: *Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans. Working with Local Nature Partnerships where appropriate, this should include an assessment of existing and potential components of ecological networks. A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.*

¹⁵ See also NPPF para 118.

evidence base. Work commissioned by the GLA in 2016 found that up to 18% of planning applications in Greater London could have an adverse effect on biodiversity, while only 1% made use of a data search from the capital's environmental records centre, Greenspace Information for Greater London. The report recommended that London boroughs should publish on-line maps of areas close to SINCs, priority habitats and priority species, within which access to biodiversity evidence would need to be demonstrated by the applicant for both major and minor housing and infrastructure developments.¹⁶

Boroughs also need to have access to better ecological expertise to support the implementation of the Plan through Local Plan policies and decisions. A study by the RSPB and The Wildlife Trusts - *Nature Positive Local Plans* (2015) - highlighted that more needs to be done to significantly and cost effectively improve the performance of local plans (of which three reviewed were from London) in relation to biodiversity protection and enhancement.¹⁷

We believe there are merits in establishing a professional advisory service similar to that once provided by the London Ecology Unit to provide support to boroughs (as has been raised in London Assembly investigations on the Mayor's Biodiversity Strategy¹⁸); London Wildlife Trust is keen to discuss this further with the Greater London Authority as to how this may assist the Mayor meeting his ambition to achieve 50% greenspace cover.

The London Plan must be also underpinned with additional Key Performance Indicators to help monitor the performance of Plan policies in respect of biodiversity losses or gains and change in greenspace. Those set out in Chapter 12 do not address this.

Finally, we believe it is important that this policy is extended to selected 'Minor' applications (in the sense of planning application type coding), as the cumulative impact of these applications may far exceed the impacts of 'Major' developments. For example in the London boroughs of Ealing, Southwark and Camden, the number of 'Minor' housing applications exceeded 'Major' applications in 2014 by a ratio of around 25 to 1, while the area covered by these respective application types in the Borough of Ealing was around 19 to 1.

We therefore recommend that **Policy G6 is significantly amended** as follows:

A Policies and proposals must aim to secure net biodiversity gain. Sites of international importance, Sites of Special Scientific Interest (SSSIs) and Sites of Importance for Nature Conservation (SINCs) should be protected. The greatest protection should be given to the most significant sites.

B In developing Development Plan policies, boroughs should:

- 1) use the relevant procedures to identify ecological networks, (including protected wildlife sites (such as SSSIs and SINCs) and ~~green~~-connecting ecological corridors). When undertaking comprehensive reviews of SINCs across a borough or when identifying or amending Sites of Metropolitan Importance boroughs should consult the London Wildlife Sites Board*
- 2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them*
- 3) seek opportunities to create and restore habitats that are of particular relevance and benefit in ~~an urban~~ the local context*
- 4) include policies and proposals for the protection, ~~and~~ conservation and, where possible, net gain of priority species and habitats and opportunities for increasing species populations*
- 5) ensure sites of European or national nature conservation importance are clearly identified and appropriately assessed.*

¹⁶ www.london.gov.uk/sites/default/files/biodiversity_and_planning_research_report_0.pdf

¹⁷ [www.wildlifetrusts.org/sites/default/files/files/275-0618-15-16_%20Nature%20Positive%20Plans%20report\(1\).pdf](http://www.wildlifetrusts.org/sites/default/files/files/275-0618-15-16_%20Nature%20Positive%20Plans%20report(1).pdf)

¹⁸ www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Biodiversity%20letter%20to%20Mayor%2026.03.15_0.pdf

6) ensure that applications in, adjacent or near to SINC, priority habitats or priority species, to access the best available and consistent evidence base on biodiversity, to allow an informed decision to be made.

C Development on land within or outside statutorily designated sites (including SSSIs, SPAs and SACs (either individually or in combination with other developments)) should not normally be permitted.

1) boroughs have a duty to consult Natural England before granting planning permission on any development that is in or likely to affect a statutorily designated site

2) in the case of a European (international) designated site where compensatory provision is identified as the only potential solution, it is necessary to demonstrate that the development would not adversely affect the conservation status of the site, there are no alternatives to the European site and that Imperative Reasons of Overriding Public Interest (IROPI) exist which justify why the project should proceed.

D Developments which would cause direct, indirect or cumulative harm to a SINC should not be permitted unless the benefits of the development proposal can be clearly demonstrated to outweigh the biodiversity impacts. In such cases the following approach ~~Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following approach~~ should be applied to minimise development impacts:

- 1) avoid adverse impact to the special biodiversity interest of the site
- 2) minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site
- 3) seek appropriate off-site compensation only in the exceptional cases where the benefits of the development proposal can be clearly demonstrated to outweigh the biodiversity impacts

E Opportunities for biodiversity enhancement aimed to secure net gain should be considered, identified and mapped at design and planning stage from the start of the development process.

F Proposals which create new or improved habitats that result in net positive gains for biodiversity should be considered positively, as should measures to reduce deficiencies in access to wildlife sites.

In respect of para 8.6.1, Sites of Local Importance are not simply access focused; they have a local wildlife value as well.

Attached to para 8.61. (Sites of Importance for Nature Conservation) we recommend there should be a map showing the five levels of SINCS, and/or a table listing the strategically important sites (European/international, national (SSSIs), Sites of Metropolitan Importance).

Para 8.6.2 (wide variety of important wildlife habitats) should make more explicit reference to the 'Lawton principles' under *Making Space for Nature*, therefore seeking to expand the size, quality, number and connectivity of habitats, of which the identification, management and protection of ecological corridors (rather than just green) is part of this.

Policy G7 Trees and woodlands

We support Policy G7 in principle but wish to see a stronger commitment to the protection of ancient woodland and veteran trees. In addition, appropriate location for tree-planting can be both strategic and, if needs be, local. We also recommend that the requirement to produce tree & woodland strategies (either separately or integrated with green infrastructure or biodiversity action plans) should also be a requirement to help inform policy.

We recommend amending Part B to:

B In their Development Plans, boroughs should:

- 1) Identify and give the strongest protection to 'veteran' trees and ancient woodland, especially where these are not already part of a protected site
- 2) identify opportunities for tree planting in appropriate strategic locations.
- 3) be informed by a regularly updated tree & woodland strategy

Policy G8 Food growing

We support Policy G8.

Policy G9 Geodiversity

We welcome and support Policy G9.

In para 8.9.2 when referring to “*Sites of Special Scientific Importance*”, this should say “*Interest*”.

We note that this policy is accompanied by the only map (fig 8.1) in the chapter, which as we referenced earlier for this chapter seems unbalanced. The map, for completion, should also include the SSSIs designated for geodiversity, as the title states “*Sites of National/Regional Geodiversity Importance.*”

In para 8.9.4 the commitment to access, which we support in principle, needs to be more explicit as to when it may not be appropriate, along the lines of:

Access for all should be encouraged to geodiversity sites, although restrictions may need to apply due to ownership or geological sensitivities of a site.

Chapter 9: Sustainable Infrastructure

Policy SI1 Improving air quality

We welcome and support Policy SI1. In para 9.1.1 we recommend that reduction in harm to biodiversity and improving ecological integrity are also listed as additional benefits of reducing air pollution.

Policy SI2 Minimising greenhouse gas emissions

We support Policy SI2

Policy SI4 Managing heat risk

We welcome and support Policy SI4.

Policy SI5 Water infrastructure

We welcome and support Policy SI5. However, we recommend adding text under paragraph 9.5.8 to read:

Borough's Local Plans are expected to be supported by evidence which demonstrates that the development planned for:

- a) Will not compromise the Thames River Basin Management Plan objective of achieving 'Good' status, or cause deterioration in water quality, and;*
- b) Will be supported by adequate and timely provision of water infrastructure.*

Policy SI7 Reducing waste and supporting the circular economy

We support Policy SI7.

Policy SI8 Waste capacity and net waste self-sufficiency

We support Policy SI8.

Policy SI10 Aggregates

We support Policy SI10, particularly the commitments to reduce the environmental impacts and under clause D1). [*do we reference commitment to securing net gain here too?*]

Policy SI11 Hydraulic fracturing (Fracking)

We welcome and support Policy SI11. [*We recommend amending the criteria under para 9.11.4 – all SINC's, not just SMIs*]

Policy SI12 Flood risk management

We welcome and support Policy SI12.

[*Seek opportunity for natural flood management and structures that support multiple ecosystem services*]

Policy SI13 Sustainable drainage

We welcome and support Policy SI13 in principle, but recommend that Part B should be amended to reflect a more realistic drainage hierarchy:

B Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy:

1. *Infiltration techniques including rain gardens/swales*
2. *Green/blue roofs*
3. *Rainwater harvesting for domestic greywater use*
4. *Attenuation in open water features for gradual release*
5. *Attenuation above ground*
6. *Discharge to a watercourse via filtering method e.g. reedbed/wetlands*
7. *Attenuation below ground*
8. *Discharge to surface water sewer*
9. *Discharge to combined sewer*

Part C is somewhat weak: 'where appropriate' is a very much open to interpretation we recommend replacing with:

C Development proposals for impermeable paving should be refused ~~where appropriate~~ where suitable permeable surface is available, including on small surfaces such as front gardens and driveways.

The drainage hierarchy should also take into account local geology, and especially on large developments, opportunities to contribute to aquifer recharge should be identified (this links to Policy SI5). We suggest adding to Part E:

D Drainage should be designed and implemented in ways that address issues of water use efficiency, river water quality, aquifer replenishment, biodiversity, amenity and recreation.

Policy SI14 Waterways – strategic role

We welcome and support Policy SI14. We recommend however, that the biodiversity importance of Thames Policy Areas (para 9.14.5) needs to be referenced.

*9.14.5 Setting **the boundary of TPAs** should be done in consultation with neighbouring authorities, including those across the river. In defining these boundaries, boroughs should have regard to the following:*

- *proximity to the Thames*
- *clear visual links between areas, buildings and the river*
- *specific geographical features such as main roads, railway lines, natural features and hedges*
- *the whole curtilage of properties or sites adjacent to the Thames*
- *areas and buildings whose functions relate or link to the Thames*
- *areas and buildings that have an historic, archaeological or cultural association with the Thames*

We wonder what has happened to the Blue Ribbon Network; we believe it is a well-understood concept.

Policy SI15 Water transport

We remain concerned that the protection of waterways (Policy S17) comes as a final policy within this draft Plan; in our view this should be set out before the policies for transport and leisure.

We recommend that Part C of Policy SI15 is amended to:

C Development proposals to facilitate an increase in the amount of freight transported by river should be supported if they can demonstrate no adverse environmental impacts on the waterbody.

Policy SI16 Waterways – use and enjoyment

Whilst we support Policy SI16 in principle we remain concerned that a key reason for people enjoying waterways throughout most of London are their naturalistic state and the opportunities to have contact with the natural world by experiencing wildlife (whether bird-watching, angling, kayaking or simply a riverside stroll. Protecting these assets are a key to people enjoying waterways; we do not this is adequately reflected in the policy or supporting paragraphs. We recommend amendments to Parts B, C, D and G:

B Development proposals that increase the provision of water sport centres and associated new infrastructure will be supported if a deficit in provision has been identified locally and if the infrastructure and activity does not negatively impact on navigation or riverine ecology.

C Development proposals for cultural, educational and community facilities and events should be supported and promoted, but should take into consideration the protection of biodiversity and hydrological functions, as well as other uses of the waterways.

D New mooring facilities should be:

- 1) supported as part of development proposals, but should be off-line from main navigation routes, in basins or docks, unless there are no negative impacts on navigation or riverine ecology
- 2) managed in a way that respects the character and environment of the waterways.

G Development proposals along waterways should explore opportunities for new, extended, improved and inclusive access infrastructure, and enhance biodiversity.

Policy SI17 Protecting London's waterways

We welcome and support Policy S17: we recommend that it makes sense to placed before policies SI15 and SI16. We recommend a minor amendments to Part A

A Development proposals that facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect the foreshore and floodplain, protect and improve riparian and adjacent terrestrial habitats, and improve water quality and increase the heritage ~~and habitats~~ value, should be supported ~~if appropriate~~. Development proposals to impound and constrain waterways should be refused.

and to Part D:

D Development proposals along London's canal network, docks, other rivers and water space (such as reservoirs, lakes and ponds) should respect their local character, ~~and environment~~ and biodiversity, and should contribute to their accessibility and active water-related uses. Development Plans should identify opportunities for increasing local distinctiveness.

We also recommend the policy is reviewed against the current London Plan's range of 'Blue Ribbon Network' policies, notably Policy 7.28 and text, which we consider is stronger in terms of delivering action on restoring and protecting London's waterways network.

Chapter 10: Transport

Policy T2 Healthy Streets

We welcome and support Policy T2.

Policy T8 Aviation

We object to Policy T8, as it supports the development of air traffic growth; the focus of the policy should be aiming to manage down demand. Part D makes no reference to the significant landtake and broader adverse ecological impacts of expansion at Heathrow, that would still take place if air and noise pollution aspects were able to be satisfactorily accepted by the Mayor. These should be reflected in Parts C and D, as:

C The environmental impacts of aviation must be fully acknowledged and the aviation industry should fully meet its external and environmental costs particularly in respect of noise, air quality, ecology and climate change; any airport expansion scheme must be appropriately assessed and if required demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts.

D The Mayor will oppose the expansion of Heathrow Airport unless it can be shown that no additional noise, ~~or~~ air quality or net biodiversity harm would result, and that the benefits of future regulatory and technology improvements would be fairly shared with affected communities.

Chapter 12: Monitoring

Policy M1 Monitoring

We support this policy, but it is currently incomplete. Under the Environment only two KPIs are proposed: we recommend amendments to Table 12.1.

| Environment | |
|-------------|--|
| KPI | Protection of Green Belt and Metropolitan Open Land |
| Measure | Harm to the Green Belt and Metropolitan Open Land prevented through the referred application process. |
| KPI | Carbon emissions through new development |
| Measure | Average on-site carbon emission reductions of at least 35% compared to Building Regulations 2013 for app |

Whilst important for their own qualities, we would argue that harm to the Green Belt and Metropolitan Open Land is not necessarily a reflection of environmental change, as the key objective of the GB and MOL is to provide open-ness.

In our view the indicators should also include those linked to the Mayor's targets covering 'greening' London, such as a commitment to achieve net biodiversity gain.

Given the greatly elevated scale of development outlined within the draft Plan, and the emphasis on the use of small sites for housing in particular, we are concerned that protected wildlife sites (inc. SINCs, SSSIs) will be under greater pressure from development. Whilst Policy G6 contains protective measures for wildlife sites, in the absence of a specific KPI it will not be possible to evaluate the adequacy of protection afforded through the Plan, and will therefore reduce the scope for subsequent revisions of policy if necessary.

We also refer to the disproportionately low number of planning applications for which appropriate surveys are undertaken and appropriate mitigations for impacts on biodiversity can be demonstrated – estimated to be about 1% of all planning applications currently meet this, whilst there is an estimated 18% that are shown to have potential impacts.¹⁹ Therefore we recommend the following KPI:

KPI: Protection of biodiversity

Measure: the number of planning applications informed by and measured against the GiGL evidence base

This would commit applicants and local authorities to avoiding net loss and informing net gain at all stages of development control planning. We also consider that the number of Sites of Importance for Nature Conservation (SINCs) under positive management might be an additional KPI; this is similar to the collected data sets collected for Defra (Single Data List 160-00: *Local nature conservation/biodiversity*) by local authorities.²⁰

¹⁹ www.london.gov.uk/sites/default/files/biodiversity_and_planning_research_report_0.pdf

²⁰ www.gov.uk/government/uploads/system/uploads/attachment_data/file/604341/Single_Data_List_for_2017-18.pdf and www.gov.uk/government/statistical-data-sets/env10-local-sites-in-positive-conservation-management