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Chris Rose,


FOREWORD

The while document is based on the false premise that never-ending 'growth' is inevitable, desirable and 'sustainable'. And it does mean never-ending because there there is no suggestion of any limit or that there ought to be any end point in this document. We see, for example, that the housing figures are likely to be jacked up again in 2029.

Bexley's figure has already been hiked from 4,500 to 22,000 to 31,000 by c2026 in a matter of 5 years since the original target was agreed (after public consultation). It is now bulldozing ahead with a 'growth strategy' encompassing these figures that 85% of people have rejected in another of its fake money-wasting 'con'sultations.

'Good growth' is a fig leaf for lack of human self-control and will still result in a net increase in resource consumption which is unsustainable.

0.0.6 refers to international treaty obligations, yet there is no reference to the UK's Aichi treaty commitment to get resource consumption down to sustainable levels by 2020. It is reckoned that the UK is living a 3 planet lifestyle, so that requires a 66% cut. Or is that someone else's responsibility and nothing to do with London? New Scientist published a graphic a few years ago showing that London's resource footprint required the whole of the UK's materials, so I suggest London has to take a very large chunk of the UK's responsibility in this.

It is depressing that this plan unquestioningly accepts what came before with Boris Johnson - a massive population increase and the whole 'city of the east' concept, already undermining the green character of my Borough. I note there is no mention of a future for other species in the capital in the foreword, which rather sums the importance this matter is afforded.

'Chapter 1'

If you must use the 1984-ish 'good growth' then it should be defined as things that set out to hugely reduce London's ecological footprint and enhance biodiversity.

In 1.2.6 Existing green space designations will remain strong to protect the environment

But this doesn't work because the best areas for wildlife in most of London are SINC's and these have no real legal protection and so called 'economic arguments' are repeatedly used to justify trashing them. If the Mayor believes what he said about the core role of SINC's in his Environment strategy he must do something about this.

GG2A fails to recognise the importance of brownfield for wildlife in the Thames gateway in particular.

GG5 requires a net reduction in resource take, not just resource efficiency.

2.0.3 - outer London intensification = a licence for garden-grabbing to which I am opposed.

Fig 2.7 shows part of the Erith Marshes SMINC and Crayford Marshes which is also green belt in an 'opportunity area' which I trust does not mean the Mayor thinks they should be built on more than they have been already. Indeed he recently rejected a scheme on Crayford Marshes.

In 2.1.53 does the Mayor realise that development around Slade Green station, as now advocated by Bexley Council also, will mean the loss of yet another SINC and yet another of our beleaguered reptile populations in the Borough?

I have only skim read Chapter 3, but it appears not to mention design of gardens with wildlife in mind, including permeability for ground-dwelling species such as hedgehogs and reptiles and amphibians.

Chapter 8.

8.1.1. Multifunctionality is OK up to a point, but coupled with a massive population hike the danger is you loose the more specialist species that cannot tolerate significant amounts of persistent human disturbance.

8.2.1 Could this please be made more nuanced in respect to brownfield, which is often high value for wildlife in the Thames gateway. I was dismayed to note Bexley drew up a brownfield register with no reference to wildlife value. The planning process is too bent in favour of development, and Cllr's understanding too limited to save 'brownfield' otherwise.

G4 A vz D/E highlights the schizophrenic approach driven by a fixation with growth. You either protect these places or you don't. The NPPF presumption in favour of 'development' coupled with no right of third party appeal means that in practice wildlife loses nearly every time and SINC status or even protected species other than Dodos aren't deemed 'worthy' enough to override money.

8.4.3 The creation of new green or open space is essential in helping to meet the Mayor's long-term target of making more than 50 per cent of London green by 2050.

This should be by de-concretising and not the smoke and mirrors of claiming that turning previously private open space into public open space makes it 'new open space'.

Table 8.2 goes some way to making it clear that not all 'urban greening' is equal. In particular, too many industrial units, supermarkets etc. get flung up and surrounded with an anachronistic 'corporate planting' comprising a jumble of 'easy care' non-natives of limited or very little wildlife value. I suggest you add such a category and give it a low score to indicate it is not recommended. (Semi-)natural vegetation - yes, including 'weeds' should be encouraged instead. The obsession with 'tidiness' in this regard needs to be overcome.

In G6

B3 add ' these include 'brownfield' (open mosaic) habitats'.

B4 include policies and proposals for the protection and conservation of priority species and habitats and opportunities for increasing species populations

Increase populations - GOOD! but para doesn't quite read right. Delete 'opportunities' to make it absolutely clear the policies should seek to deliver that outcome.

C Harm is never unavoidable - unless you're one of these quasi-religious growth fetishists.

C2 is about cramming more wildlife into less space, with is the de facto policy of this plan and of Bexley's 'growth strategy'. This is not a credible or workable long term approach.

C3 add at end ... any translocations should be within the Borough itself or, if in another local authority area, as close as possible to the 'donor' site. (This is so that we don't have our key local wildlife shipped miles away for the sake of expedient rush-jobs, as Bexley would be quite happy to do).

8.6.1 Please strengthen wording for benefit of e.g. Bexley Council by emphasising that 3, 4 and 5 (SINCs) are the most important wildlife sites in most Boroughs given the paucity of London SSSIs and above, and are therefore critical for pan-London wildlife conservation efforts.

Chapter 8 makes no mention at all of the individual and aggregate value of domestic gardens for wildlife. Please rectify. Maybe this is no surprise given the obvious growth-fixated desperation to find more spaces to cram in yet more buildings.

Policy S14 Heat island - please issue some kind of admonition about paving over front gardens, and link in with policies about car-free developments and design etc.

S17 65% by 2030 unambitious. Circular does not of itself equal sustainable - it depends how much stuff you've abstracted from nature to circulate round the human economy.

Point 4 - no to incineration.

I suggest we need a hierarchy of 'if it isn't recyclable/repairable here you can't sell it here' e.g. plastic bags, basic electrical goods - Borough level, computers, high tech machinery - London level.

ENDS

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