
Heritage and Culture

Night time economy

Matter 49

Would Policy HC6 provide an effective and justified approach to support the growth and diversification of London's night time economy (NTE)? In particular:

- a) Is the definition of 'strategic areas of night time activity' as set out in table A1.1 effective and justified?*
- b) Does it strike the right balance between supporting the NTE and protecting the living conditions of residents and nearby uses in terms of anti-social behaviour, noise pollution, health and wellbeing and other issues?*

In respect of question b) the Trust welcomes the amendment to para 7.6.10 (as set out in the in the *Draft New London Plan showing Minor Suggested Changes* (August 2018; hereafter referred to as *DNLN-Minor Suggest Changes*), which states:

The night-time economy doesn't only happen inside; many night-time activities make use of outside spaces including the public realm, and enjoying the public spaces of the city at night is an important part of the night-time experience. This requires careful and co-ordinated management between a wide variety of stakeholders, including residents, in order to ensure that the city can be enjoyed at night to its fullest, and that the night-time economy complements rather than conflicts with daytime activities. Impacts such as noise and light pollution on local wildlife and biodiversity should be considered through appropriate location, design and scheduling.

We recommend that this element can be further shortened to:

Impacts such as noise and light pollution on ~~local wildlife and~~ biodiversity should be considered through appropriate location, design and scheduling.

However, the matter we raised on the impacts of nocturnal activities (and especially light and noise) on biodiversity is effectively 'lost' in the Policy HC6 within an amended reference under B, 4) to:

"...other impacts ~~issues~~ for residents and nearby uses."

We do not think this is clear or adequate enough to 'strike the right balance'. We recommend that the impacts on nocturnal wildlife species, especially those of 'principal' conservation importance (primarily bats and badger, which are also subject to legal protection), and also various birds, small mammals, deer, and a variety of invertebrates, are significant enough to make these a specific and explicit consideration, given the planned growth of the night-time economy. Such wildlife is even present in the Central Activities Zone as well as in or close to the strategic areas of night-time activity.

The GLA Economics report *London at night: An evidence base for a 24-hour city* (November 2018), makes no reference to the environmental costs of the current night-time economy other than a line on “*Local authority costs around street cleaning, and maintaining the public realm.*”¹

However, there is considerable evidence that bats are sensitive to noise and light disturbance. Most species are affected by light and gleaning bats (which locate prey by the sounds they make) are disturbed by noise. We recognise that the impacts of noise and lighting upon other nocturnal wildlife is not as well understood, but would recommend that the precautionary approach is adopted, as recommended in para 170 of the National Planning Policy Framework (our emphasis);

Planning policies and decisions should contribute to and enhance the natural and local environment by:

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

We repeat our recommendation for a specific clause under HC6, B:

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

Mathew Frith
London Wildlife Trust
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¹ Mayor of London (2018). *London at night: An evidence base for a 24-hour city*, GLA Economics.
www.london.gov.uk/sites/default/files/london-at-night-full-final.pdf