

Draft London Plan EiP 2019

London Borough of Bromley Written Statement

Matter M66

Biodiversity, trees, food growing and geodiversity

Would Policies G6-G9 assist in creating a healthy city in accordance with Policy GG3 and will they provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are the individual policies and detailed criteria justified and necessary and would they provide an effective basis for development management? In particular:

a) Will Policy G6 be likely to achieve net gains in biodiversity and consistent with national policy? Are specific provisions relating to European sites in BA necessary give other legislative requirements?

b) Will Policy G7 be effective in protecting trees and woodland especially ancient woodland and veteran trees and in increasing the extent of London's urban forest?

c) Does Policy G8 provide sufficient encouragement to food growing and urban agriculture?

Comment

a) Will Policy G6 be likely to achieve net gains in biodiversity and consistent with national policy? Are specific provisions relating to European sites in BA necessary give other legislative requirements?

Although Policy G6 is titled "Biodiversity and Access to Nature" it is almost entirely about SINC's rather than biodiversity in general. Whilst Clause B 3) mentions priority species outside the SINC network, it doesn't provide an overall framework for biodiversity in the Capital. As set out in Bromley's "Valuing Garden Land" review it fails to acknowledge the role of private gardens and the habitats and species which they support.

Whilst the NPPF, at Para 118, sets out when proposals for development resulting in harm to biodiversity should be refused, (i.e. where significant harm cannot be avoided, cannot be *adequately mitigated, or, as a last resort, compensated for*) Policy G6 does not give such assurances and could leave SINC's vulnerable.

National Policy is predicated on the sustainable development of previously developed land and as such any lower level policies seeking to relax the protection on open and green space for the purpose of development would not be consistent. In addition, Policy G6 is inconsistent with the Draft London Plan's own strategic policy GG2 which states that "*those involved in planning and development must ...protect*

and enhance London's open spaces, including ...designated nature conservation sites".

It is unclear what the test for "unavoidable" in Policy G6 Clause C is intended to be. Whilst the NPPF Para 118 states that "unavoidable" means when development cannot be located elsewhere, given the high housing targets and the strategy of "sustainable intensification" set out in the Draft London Plan, there should be transparency about whether this test is materially different, especially with the additional clause of "*and where the benefits of the development proposal clearly outweigh the impacts on biodiversity*"

The mitigation hierarchy in Clause C offers room to argue over which ecological features of the SINC are more or less significant, negating the purpose of designating sites, rather than elements of sites, in the first place and will inevitably lead to harm.

In conclusion, the lack of protection for biodiversity in private gardens and the potential for development on SINC's despite their designation is unlikely to help achieve a net gain in biodiversity.

b) Will Policy G7 be effective in protecting trees and woodland especially ancient woodland and veteran trees and in increasing the extent of London's urban forest?

Whilst Para 8.71 acknowledges the value of all trees and woodlands in the urban environment, Clause C of Policy G7 only protects trees of "value". Given the lack of recognition of residential gardens – and particularly larger gardens which are more likely to contain trees – it is considered unlikely that the goal of a 10% increase in the tree canopy by 2050 will be achieved. The London Environment Strategy (p144) states that 20% of the surface area of London is woodland, parks and gardens, and yet an understanding of and protection for the latter is missing from the London Plan as a whole, risking significant harm.