



Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
Post Point 18
FREEPOST RTJC-XBZZ-GJKZ
London SE1 2AA

BY EMAIL ONLY

**Growth, Environment
& Transport**

Room 1.62
Sessions House
MAIDSTONE
Kent ME14 1XQ

Phone: 03000 415981
Ask for: Barbara Cooper
Email: Barbara.Cooper@kent.gov.uk

2nd March 2018

Dear Mayor of London,

Re: Draft London Plan

Thank you for the opportunity to provide a response to the draft London Plan consultation.

Kent County Council (KCC) is a major infrastructure provider, with statutory responsibilities for social care, education, minerals, waste and highways in Kent. The County Council therefore has a critical role in creating sustainable communities with the necessary supporting infrastructure across Kent.

Strategically, the County's position next to London, and as the UK's main international gateway from the UK into Europe, makes it an area of national importance; critical to the national economy. It also means that the Kent economy is particularly sensitive to external demographic and economic influences, including those from London.

KCC's Kent and Medway Growth and Infrastructure Framework (GIF) assesses the planned levels of housing and economic growth for the County to 2031 and the cost of infrastructure needed to support this growth. The analysis shows a significant gap of £3.9 billion¹ between the funding required and that anticipated/secured just to meet planned growth across Kent and Medway. Therefore, KCC is encouraged by the aspirations of the draft London Plan to deliver new homes for Londoners largely within its boundaries and we fully support your commitment to working with the Wider South East in ensuring sustainable patterns of growth.

KCC would, however, like further reassurance on how you intend to coordinate crossboundary working and what this will entail, alongside further clarity on the role, opportunities and support you envisage providing for "willing partners". If London is unable to meet its planned housing need within its boundaries, and seeks to locate growth in Kent, further

The GIF is currently being updated, and these figures are currently in draft significant investment would be required for KCC services and wider necessary infrastructure to meet the increased demand.

Detailed comments are provided below, following the chapter order within the draft London Plan.

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

The draft London Plan focuses on building strong, sustainable and resilient communities. Within Appendix A, the KCC Resilience and Emergency Planning Team has provided commentary on individual policies to mainstream resilience throughout the Plan.

Spatial Development Patterns (Chapter 2)

The draft London Plan recognises the interconnectivity of London's labour market, housing market and transport links with the Wider South East, as well as the level of contribution and influence that London has on the economy (para 1.4.8, pg. 20) The County Council supports the recognition within the draft Plan of the impact of London's growth on areas outside London.

Partnership working and "willing partners"

There are already significant pressures across Kent in providing infrastructure to support planned growth to 2031, with the GIF identifying an associated infrastructure funding gap of over £3.9 billion¹. Therefore, where growth is proposed within Greater London on sites close to the boundary with Kent, a collaborative working relationship is essential. Any such sites are likely to create additional demand for KCC services from new residents and these services will require investment to mitigate the impact of that growth. Instances of crossboundary demand could arise through the designation of strategic areas of regeneration in Bromley and Bexley (figure 2.19), pg. 50). A coordinated approach is vital to ensure that infrastructure and services are able to sustainably meet cross-boundary demands.

References to partnership working (policies SD2 and SD3) are encouraging; however, what this collaboration will look like is not clear. The draft London Plan refers to the need to work with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital (para. 2.3.4, pg.62), with Policy SD3 seeking joint working and recognition of mutual benefits. However, to date, there has been little engagement from London and within this context, it is not clear how you intend to build and maintain this relationship. KCC would expect more clarity around how regional and shared strategic concerns will be tackled collaboratively.

If, looking ahead, there are "willing partners" in Kent identified, and as a result, any of London's growth were to be accommodated within Kent, significant investment in necessary infrastructure would be required to fully meet growing demand. Securing the investment and

¹ The GIF is currently being updated, and these figures are currently in draft

delivering the infrastructure would require a coordinated and collaborative relationship between London and any “willing partner”, as well as with KCC as a key strategic infrastructure provider.

Strategic Infrastructure Priorities

KCC strongly supports your identification of Elizabeth Line extension (C2E) and the Lower Thames Crossing as critical strategic infrastructure projects. We are already working closely with neighbouring London boroughs in the development of the C2E and are part of a working group with Transport for London (TfL), Network Rail, the London Borough of Bexley, Thames Gateway Kent Partnership, Ebbsfleet Development Corporation and Gravesham and Dartford Borough Councils, in preparing a Strategic Outline Business Case for the proposed extension.

These projects offer real opportunities for enhancing transport links between Kent and London, prospering both economies. In Kent, C2E will establish a strategic interchange between High Speed One and Crossrail outside the M25, providing a major economic stimulus for Dartford, Gravesend and the new garden city at Ebbsfleet. In doing so, C2E will also deliver additional connectivity between the South East, London and with HS2, onwards to The Midlands and The North.

Housing (Chapter 4)

Housing need methodology

KCC is supportive of the draft London Plan’s aspirations to deliver almost 65,000 homes per annum, with a housing need of 66,000 per annum, and to accommodate this within the London boundary (Policy H1). However, there is concern around the use of a different methodology compared with other local plan housing need calculations (as set out in the Strategic Housing Market Assessment (SHMA)) to determine the housing need figure. The County Council is particularly concerned that it is likely to create ambiguity. The use of a non-standardised methodology - inconsistent with national planning guidance and the way in which authorities in Kent have calculated their needs - will potentially open up risk to challenge from a range of stakeholders.

Housing shortfall

A delivery shortfall of 1,000 homes per annum has been identified in the draft London Plan. Any cumulative impact of accommodating the shortfall in Kent would have significant implications on the provision of housing, infrastructure and services across the County. This is particularly important given the existing severe pressures in the provision and funding of infrastructure already identified in the GIF. The County Council would therefore like to understand how and where this identified shortfall will be accommodated.

In addition, the Greater London Authority (GLA) Annual Monitoring Reports indicate that net completion rates in London are well below the target rate of 65,000 homes per annum as set out in the draft London Plan. For example, GLA Annual Monitoring Report 13 (2015/2016)

states that the net completion rate across London was 38,553 homes per annum. Meeting a much higher delivery rate within London will be very challenging and KCC would expect robust mechanisms to be put in place to ensure that if the delivery targets are not met, unplanned overspill into Kent does not occur.

The ten year Plan focus

The County Council requests further clarity around the latter part of the Plan period. The draft Plan's focus on the first ten years to deliver just short of 65,000 dwellings a year up to 2028/29 leaves uncertainty over the remainder of the Plan period to 2041. The Plan is unclear how post 2029 housing needs will be addressed. More certainty and further detail needs to be provided, particularly around priorities and delivery after the first ten years.

Small Sites

The draft London Plan introduces an increased emphasis on delivering small sites for housing (Policy H2). The delivery of small sites is supported in so far as it will help to increase the supply of new homes. However, the development of small sites can restrict the ability to provide comprehensive infrastructure to support housing growth, as smaller sites are not always able to deliver the larger scale infrastructure required to support growth. Where development is likely to have cross boundary implications, collaboration will be vital in the delivery of small sites to ensure the delivery of necessary infrastructure.

Affordable Housing

KCC seeks assurance that the draft London Plan will provide the required range and mix of private and affordable housing within the boundaries of London. London boroughs should be required to deliver social housing/temporary accommodation within a reasonable vicinity of their area, rather than looking at significant relocations into Kent, which places additional strains on resources and on already stretched public services in the County. Where any "exceptional circumstances" are identified (Policy H5), and if the delivery of affordable homes is likely to have an impact on Kent, KCC would expect early engagement from the London Borough with ourselves and the relevant district / city authority. This should ensure that the required infrastructure is in place beforehand to meet the needs of the new residents, with sufficient investment secured as required.

Economy (Chapter 6)

Industrial uses

The proposal to work with areas outside London (Policy E7 Part F), "*... to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere in*

London and beyond” lacks clarity, as it does not set out any proposed mechanisms to facilitate this collaboration.

In Kent, there is 6.43 million m² of industrial business floor space. Evidence indicates that demand is exceeding supply in some areas of Kent for industrial property, with demand for office space as well.

KCC would expect your commitment to a structured and coordinated approach to any potential for relocation of London’s employment land into Kent. If there are such opportunities, KCC should be involved in the development of a strategy from the outset to ensure that the most suitable businesses are located in appropriate locations.

Green Infrastructure and Natural Environment (Chapter 8)

Green Belt and Metropolitan Open Land (MOL)

Despite the commitment given to deliver housing growth within London boundaries, it is difficult to see how this could be achieved without a Green Belt review and potential dedesignation of areas within the inner edge of the Green Belt; particularly given the significant jump in delivery rates that will be required. It is not clear how Policy G2 in the draft London Plan is consistent with paragraph 84 of the National Planning Policy Framework (NPPF) and the need to promote sustainable patterns of development when reviewing Green Belt boundaries. As areas outside London are under significant pressure to undertake Green Belt reviews to accommodate high levels of growth, the same approach should be taken across London.

Furthermore, the policy could limit some London Boroughs’ ability to meet their housing targets and place further pressure on Kent to accommodate London’s housing need. The policy may also be found to be unsound and may not be adopted. This issue is exacerbated further by the MOL restrictions.

KCC encourages consideration of the importance of maintaining and delivering green and open spaces alongside housing, employment and infrastructure to ensure sustainable development. The delivery of green spaces alongside growth results in environmental benefits, including the enhancement of biodiversity and improvements in air quality. KCC would like to refer you to the Kent Environmental Strategy², which provides a strategy to support the delivery of a competitive and resilient economy, with business innovation in low carbon and environmental services driving economic growth benefitting residents and business alike.

Biodiversity

The draft London Plan should require green infrastructure strategies created by London Boroughs to include consideration of cross boundary connectivity.

² http://www.kent.gov.uk/__data/assets/pdf_file/0020/10676/KES_Final.pdf

Part D of Policy G6 should state that biodiversity enhancement must be considered from the start of the development process as opposed to the current drafted wording of, “*should be considered*” (Policy G1 Part B) which creates unnecessary ambiguity.

KCC recommends that Policy G6 Part C needs to be expanded to clearly set out how the impact on the designated sites needs to be considered, depending whether it is of European / International / National / Local importance.

The County Council would also highlight that the Wildlife Trusts have recently published Guidelines on Planning for Homes and Wildlife which set out how new housing developments can be built in a way that helps to reverse wildlife and habitat decline³. This document should be considered in the relation to this chapter in the draft London Plan.

Sustainable Infrastructure (Chapter 9)

Broadband Connectivity

KCC supports the development of a deliverable longer-term strategy for the UK to extend the coverage of full-fibre networks and ultra-fast digital connectivity. Currently, there are no Building Standards or national planning requirements for new development sites to include fibre connectivity. KCC is currently working with Ashford Borough Council on the development of a fibre connectivity policy within their draft Local Plan which incorporates this requirement and is promoting this type of policy to the Ministry of Housing, Communities and Local Government (MHCLG) for consideration in the revised NPPF. KCC urges the draft London Plan to be bolder in its broadband policy to require all new homes to be delivered with fibre connectivity.

Transport (chapter 10)

Policy T1 Strategic approach to transport

KCC recognises that the scale of population growth in London presents some unique and significant challenges. Within the city, sustainable modes of transportation that make more efficient use of the space available such as walking, cycling, public transport and car-sharing schemes, need to be prioritised. However, outside London, the private car is likely to remain the dominant mode of transport. Therefore, it is vital that you work with neighbouring authorities, including Kent, to encourage investment in the essential transport infrastructure required to maximise the potential for sustainable growth of the Wider South East.

The extent of future population growth in London is not mentioned within Policy T1 and the significance of the additional trips on the network is lost. ‘Smart’ transport infrastructure is also not addressed in this section. The need to retrofit the network (signs, traffic signal, buses etc.) for it to be compatible with emerging technologies such as driverless cars, will likely be a key technical and financial challenge over the coming years. This is especially true of London as

³ http://www.wildlifetrusts.org/sites/default/files/homes_for_people_and_wildlife_lr_-_spreads.pdf.

a major UK city with the density of people to justify investment in new technologies and ideas, as has already been seen with electric vehicle-only car sharing schemes, and the availability of substantial travel data from Transport for London (TfL) to new app developers.

There is also the challenge of substantial in-commuting from the areas surrounding Greater London, particularly providing capacity on transport networks so that the City is still an attractive place to work. This includes addressing the rail price penalty where the cost of commuting by rail is a major barrier for many people. The cost of commuting by rail into London is disproportionately expensive when compared to the cost of travel for London's residents. If London is to support growth in areas outside the GLA area such as the Thames Gateway Kent, this support should include working with the GLA and DfT to extend fare subsidies to encourage people who wish to work in London to live outside of the capital.

This would also spread economic prosperity to areas surrounding London's boundary that are further away geographically but still within acceptable commuting times via High Speed 1 such as Folkestone, where journey times are around 55 minutes into London St Pancras. Further, where public transport connectivity in outer London reduces, it is also likely to fall in neighbouring areas outside the GLA boundary. A decline in cross-border TfL bus services must not be permitted.

Policy T2 Healthy Streets

KCC supports the Healthy Streets approach and has an Active Travel Strategy with the ambition of making active travel an attractive and realistic choice for short journeys in Kent. The County Council's Casualty Reduction Strategy aims to deliver a 33% reduction in the number of people killed and seriously injured on the Kent local road network between 2010 and 2020, and we are developing an Air Quality Framework with a Low Emissions Strategy.

Policy T3 Transport capacity, connectivity and safeguarding

KCC fully supports the Elizabeth line extension east of Abbey Wood to Ebbsfleet which will be particularly important for growth in the Thames Gateway Kent area. Although Crossrail 2 alone does not directly benefit rail passengers from Kent, its delivery is clearly an essential element of London's overall rail infrastructure. The interchange at Tottenham Court Road between the Elizabeth Line and Crossrail 2 will provide a single change for passengers from Abbey Wood for destinations in south-west and north-east London, which would potentially be of benefit to Kent's rail passengers who choose to change to Elizabeth Line services at Abbey Wood.

The delivery of the Elizabeth Line in full by December 2019 is strongly supported by KCC. Its south-eastern terminus at Abbey Wood will provide easy interchange from the South Eastern franchise services linking this station with Dartford and Gravesend, and also with the new Thameslink Services extending to Rochester, Chatham, Gillingham and Rainham in Medway Council's area. Furthermore, the new interchange at Farringdon with Thameslink services using the central core will provide rail journeys with just one change between Abbey Wood and a wide range of destinations in south-east England which will be served by the full Thameslink Programme network from December 2018.

The proposed extension will provide an essential transport corridor to serve the significant uplift in housing, employment and leisure developments planned, or already being built, in Ebbsfleet Garden City and in the wider Thames Gateway Kent area. Such an extension would also provide additional connectivity for domestic passengers from other parts of Kent, and for international rail passengers travelling from Paris, Brussels, Lille and Amsterdam with a single change at Ebbsfleet to an extended Elizabeth Line.

However, KCC is concerned about the devolved suburban rail services to enable London suburban metro scheme. Conversely, we support the decision to retain the Metro services within the new South Eastern franchise, and we will work with the Department for Transport (DfT) to ensure improved Metro services to Dartford, Gravesend and Sevenoaks. Therefore, KCC accepts the scope of the forthcoming franchise as settled, following the Secretary of State's decision **not** to transfer the South Eastern Metro services to TfL.

Whilst the objective of a unified suburban rail network within London is recognised, the County Council does not accept that such a change in control would deliver the estimated 124,000 additional seats into Central London in the peak period or reduce journey times by up to 15%. There is finite capacity at all the South Eastern franchise termini in the peak periods, which, even with train lengthening, are not currently capable of delivering that level of additional seating capacity.

KCC does have concerns regarding the potential for withdrawal of a high-speed service from the Kent County Town (Maidstone) to London St Pancras, with the alternative option of a service to Abbey Wood potentially not providing a suitable substitute for this high speed service.

KCC fully supports the scheme to increase national rail capacity. Kent's proximity to the Capital and existing transport links such as High Speed 1 makes it an attractive area for commuters working in London. With rail capacity already stretched, it is imperative additional capacity is provided to enable the rail network to function efficiently in line with anticipated future passenger growth.

Policy T4 Assessing and mitigating transport impacts

Transport assessments for developments in outer London should consider the potential impacts on the transport network in the Wider South East, and it is important that London works collaboratively with neighbouring authorities, especially those in North Kent to ensure any potential impacts are mitigated accordingly. Employment generating developments should also consider the potential impact on the wider transport network caused by an increased number of commuters.

Policy T7 Freight and servicing

Kent and the Wider South East play a vital role in connecting the UK to the continent. It is therefore imperative that the transport needs of the Wider South East are also met because

of our role in supporting London's growth. To be able to travel easily, safely and quickly from the neighbouring local authorities will be a key driver for London's own economic success.

KCC welcomes the recognition that freight is essential for London's businesses and to supply goods to the public, but that freight could be more efficient. This is particularly true of the timing of deliveries which would be best made outside the peak periods. However, the target reduction of van and lorry use in central London does not seem ambitious enough. The greater use of night time deliveries with due consideration to noise disturbance, should be recognised in the Plan. However, guidance should be sought from the relevant trade bodies and the role and importance of freight in servicing London's population and businesses should not be forgotten.

Part D of Policy T7 refers to how consolidation and distribution sites of all scales should be designed to enable 24-hour operation to encourage and support out-of-peak deliveries. Whilst outwardly sensible, there are cost implications in terms of building the required infrastructure and the increased handling costs which will inevitably be passed on to the consumer. The principle of consolidating deliveries outside the city and then using smaller vehicles to make the 'last mile' journey may result in more individual vehicles on London's roads in instances where one large vehicle would have been making multiple drops. However, where only partially full lorries and vans are making single trips into London there are clear opportunities for consolidation. Once consolidated, if deliveries are made using electric vehicles there will also be air quality benefits. KCC would like assurances that the knock-on effect for Kent of any measures which are implemented by London will be considered fully by you.

Part E of Policy T7 aims to deliver mode shift from road to rail or water. While rail is an ideal mode of transport for the transfer of bulk freight between ports and distribution centres, rail freight has no place operating on busy commuter routes in the peak periods. There have been numerous incidents in recent years (e.g. Lewisham in 2016) where freight train derailments have caused huge delays and disruption to rail passenger services. Rail freight should be scheduled only at off-peak and night-time periods, and then only when necessary to use busy passenger routes through Greater London.

Policy T8 Aviation

In general, KCC agrees with the principles set out in Policy T8. The policy itself captures the difficult balance between the economic benefits of airport expansion and the negative impacts, which are so often felt by communities who do not directly receive the benefits. Noise and air pollution, and especially night noise, are two negative impacts that communities impacted by airports find particularly damaging to their health and overall wellbeing. It must be remembered that the impacts of aviation noise can be felt many miles away from the airport itself.

KCC acknowledges your position on the expansion of Heathrow Airport. However, the Airports Commission concluded that a third runway at Heathrow offers the greatest benefits for the UK in terms of international connectivity for leisure and business travellers, and freight. This conclusion has been proven robust by further work from the DfT and consequently, it is the Government's preferred option for expansion as set out in the draft Airports National Policy Statement.

Furthermore, Heathrow also has the best surface access options of all the London airports and significant plans for future enhancements to their rail links, giving it a very wide catchment area. KCC strongly opposes the statement in paragraph 10.8.7 (Pg. 435) that, *“Gatwick could deliver significant benefits to London and the UK more quickly, at less cost, and with significantly fewer adverse environmental impacts.”* The work of the Airports Commission (and subsequently the DfT) examined in detail a large variety of airport expansion options, ranging from a new Thames Estuary Airport (which KCC strongly opposed) to better utilisation of high speed train services to create a virtual hub airport. They came to the robust conclusion that a third runway at Heathrow offers the greatest benefits for the UK in terms of international connectivity for leisure and business travellers, and freight. The statement in the draft Airports National Policy Statement (para. 3.18 pg 20) truly emphasises this and states, *“Gatwick would not enhance, and would consequently threaten, the UK’s global aviation hub status”*⁴ because it would remain a largely point to point airport and attract few transfer passengers.

The intolerable situation with aircraft noise in West Kent and the lack of resilience in its surface access links (served solely by the M23 and the overstretched Brighton Mainline) make Gatwick a bad choice for expansion. The rural tranquillity of the areas surrounding Gatwick would be more substantially impacted from increased overflights than the urban, and already noisy, environment around Heathrow. To this end, the County Council believes the negative impacts of a Gatwick Second Runway scheme have been undervalued in the assessment leading to the draft Airports National Policy Statement.

Part D of Policy T8 asks for the benefits of future regulatory and technology improvements to be fairly shared with affected communities in the event of Heathrow expansion. KCC considers this should be widened to the other London airports, in the extension of Heathrow’s proposed night flight ban to Gatwick and others. This would see a huge benefit of the added runway capacity spread to people across the South East who are affected by night flights. It must be noted that Gatwick currently has a permitted night movement quota that is three times higher than that at Heathrow, and the busiest summer week in 2016 saw an average 76 flights per night. This is clearly unacceptable because of its disproportionate impact on the health and wellbeing of the surrounding communities on the flight path of Gatwick.

KCC agrees that surface access improvements to airports must be funded and delivered on the same timescales as any expansion.

KCC supports part F of Policy T8. Changes to airport operations at Gatwick resulted in significant noise impacts on the ground, sensitising whole communities to aircraft noise. The recent amendments to the Airspace Change Process will see greater community involvement in proposals for change to the structure of airspace as well as changes in day-to-day operations, which were previously not consulted on in the same way. The establishment of the Independent Commission on Civil Aviation Noise will also be a welcome addition to the process to ensure communities are being heard, and KCC will monitor its impact closely.

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/588764/draft-airportsnps-web-version.pdf

KCC also supports making best use of existing airport capacity⁵. However, this must be done sensitively and consider the communities surrounding airports. Gatwick has grown exponentially since the recession and consequently the noise impact on local communities has also grown, despite it having no physical increase in capacity.

Policy T9 Funding transport infrastructure through planning

KCC supports Part A of Policy T9, which refers to charging the Mayoral Community Infrastructure Levy (MCIL) to secure funding towards transport infrastructure of strategic importance. Funding for schemes such as Crossrail 2 and other strategic transport infrastructure is imperative to ensuring their timely delivery and a transport network that meets the needs of current and future users.

Further devolution to yourself, the GLA and TfL will enable road user charging to be implemented in London as well as schemes such as a workplace parking levy. The implementation of such schemes should be carefully considered to ensure that they do not unfairly disadvantage some road users and exacerbate inequality. This must also consider cross-boundary issues between the outer London boroughs and adjoining local authorities.

Funding mechanisms should be discussed in detail with the London Boroughs who will be required to implement many of the policies and proposals.

KCC welcomes the draft London Plan's commitment to deliver 65,000 homes per annum within its boundaries and the need for cross boundary working with the Wider South East.

However, KCC has concerns regarding the significant increase required in delivery to meet the draft London Plan targets, the lack of consideration for a mechanism to mitigate if the housing targets cannot be met, and the 1,000 housing gap which could increase. KCC is hesitant of the draft Plan's policy to not consider a Green Belt review, placing further strain on housing deliver in London.

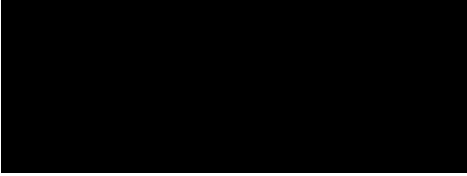
KCC would like further clarity on the role, opportunities and support you envisage providing for "willing partners" and collaborative working. Especially considering indications of expansion of London's growth into the Wider South East including Kent; and the current pressures facing Kent's infrastructure in meeting its own planned growth without additional demand from London on KCC services.

The County Council hopes that you take account of the comments raised and looks forward to further engagement with yourself as the London Plan process continues.

If you require any further information or clarification on any matter, please do not hesitate to contact me.

⁵ KCC's discussion document, Facing the Aviation Challenge.
https://www.kent.gov.uk/__data/assets/pdf_file/0016/15433/Facing-the-Aviation-Challenge.pdf

Yours sincerely



Barbara Cooper

Corporate Director - Growth, Environment and Transport

Encs.

Appendix A: KCC Resilience and Emergency Planning Policy Comments

Appendix A: The London Plan (December 2017) – KCC Resilience and Emergency Planning observations

The following amendments (in red) are recommended to mainstream resilience into this overarching policy influencing land use policy in the Capital

Page 15 Policy GG2 Making the best use of land

D Protect **and enhance** London's open spaces **and optimise the environmental services they deliver**, 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.

F Maximise **the resilience** infrastructure assets **and opportunities to use for** more than one purpose, to make the best use of land and support efficient maintenance.

Page 23 Policy GG6 Increasing efficiency and resilience

The following amendments (in red) are recommended to sharpen focus on resilience threats:

B Ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts **from extreme weather events** like **storms** and heatwaves, and **mitigate against** urban heat island effect.

C Create a safe and secure environment which is resilient against the impact of emergencies including fire, **flooding** and terrorism.

Page 57 Policy SD2 Collaboration in the Wider South East

The following amendments (in red) are recommended to sharpen focus on environmental resilience:

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 **and biodiversity**) and waste management (including the promotion of Circular Economies); wider needs for freight, logistics, port facilities and **new national parks within easy reach of and delivering environmental services for London**; and scope for the substitution of business and industrial capacity where mutual benefits can be achieved.

Page 109 Policy D4 Housing quality and standards

A new Policy D4 H should be added along the lines of:

H Integral nesting and roosting niches for wildlife such as swift, bat and sparrow bricks should be incorporated into the fabric of new housing.

Page 122 Policy D7 Public realm

Amend Policy D7 to address resilience issues more effectively:

H Incorporate **resilient** green infrastructure into the public realm to support rain water management through sustainable drainage, reduce exposure to air pollution, manage heat and **link London's greenspaces to overcome habitat fragmentation and benefit** biodiversity.

Page 129 Policy D8 Tall buildings

Add Policy D8 3) d) to address protection resilience of biodiversity issues respectively:

3) d) Integral nesting and roosting niches for wildlife such as swift bricks should be incorporated into the fabric of new tall buildings.

Page 191 Policy H16 Gypsy and Traveller accommodation

Expand H16 D 3) as follows to ensure good design and resilience for G&T sites and pitches :

3) pitches **and sites** in need of refurbishment **and/or provision of enhanced infrastructure (including utilities, open space and landscaping).**

Page 208 Policy S3 Education and childcare facilities

Expand S3 B 8) to better acknowledge provision of environmental services:

8) ensure that facilities incorporate suitable, accessible outdoor space **incorporating trees and other vegetation to cool, shade, enhance setting and boost biodiversity.**

Page 312 Policy G6 Biodiversity and access to nature

Add new D 1) and 2)

D 1) Address prevailing fragmentation of natural habitats through linked green spaces, linked street tree planting pits and ensuring gaps under fences and other boundary treatments.

2) Incorporate integral nesting and roosting niches into new development, such as swift, bat and sparrow bricks.

Page 313 Policy G7 Trees and woodlands

Sharpen biosecurity focus through the following amendment to G7 B 2) and a new D

2) identify opportunities **for natural regeneration and** tree planting in strategic locations.

At 8.7.1 addressing trees and woodlands there is a reference to Tree Strategies for individual Boroughs. A more effective approach would perhaps be to produce a strategic

London Tree Strategy, linked to the London Plan (similar to the draft Kent Tree Strategy developed through the Kent Environment Strategy) to inform local tree and woodland policy

D Optimise biosecurity and resilience against pests and pathogens by prioritising natural regeneration, and where planting does take place utilising a diverse palette of local provenance native and near tree and shrub species.

Page 334 Policy S14 Managing heat risk

Better emphasise well-evidenced value of trees and other vegetation in relation to mitigating urban heat stress by amending B 2) as follows:

2) reduce the amount of heat entering a building through orientation, shading, albedo, fenestration, insulation, **tree and shrub retention and/or planting** and the provision of green roofs and walls

Page 363 SI14 Waterways – strategic role

Add a new C to re-enforce environmental services

D To develop a riparian network for nature across London incorporating natural regeneration and planting of a new urban forest delivering a range of environmental services and enhancing local landscape and biodiversity.

Page 403 T2 Healthy Streets

Add a new D 3) emphasising value of street trees for mitigating urban heat stress and poor air quality and boosting local amenity:

3) Street tree coverage will be protected and expanded utilising the latest technology in tree pits and irrigation, and ensuring a genetically and aesthetically diverse palette of tree and shrub species.

Pages 153 – 155 Green Infrastructure

Add a new 11.1.52 to address out of London environmental offsetting along the lines of:

11.1.52 Environmental offsetting and delivery of major new green space to provide peace and quiet, leisure and environmental services for London's growing population may be most appropriate outside of the capital. For example, any new National Park or 'Southern Forest' within easy reach of London would potentially require significant financial support and spatial planning co-operation from the London Boroughs. To deliver such ambitious new green space aspirations planning obligations would need to be a key component of their delivery.