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Dear Mr. Khan

### **Natural England response to the Mayor's draft London Plan**

Natural England welcomes the opportunity to respond to the public consultation on your draft London Plan. We, the Environment Agency and Forestry Commission, as Defra's arm's length bodies, collectively have a statutory role or interest in many of the Plan's themes. We have worked together to review the draft Plan where we have complimentary interests, and this is reflected in our organisation's responses.

Natural England is a delivery body with a statutory duty to advise on biodiversity, landscape and access to nature and open space, and the contribution that spatial planning can make to further these elements. A key part of our purpose is also to support social and economic well-being through management of the natural environment.

Our vision is conservation which reconnects people with their environment; restores and recovers ecosystems and landscapes; and where a thriving economy with a rich and resilient natural environment is integral to everyday life. We are pleased to see that our vision shares themes with your aspirations for good growth.

Your draft London Plan's proposals to meet anticipated development needs will bring opportunities and risks for the delivery of the Plan's environmental objectives and infrastructure. The Plan creates an opportunity to underline the central importance of the environment to London's future, and to deliver your vision for London to be the first National Park City. As a key part of this the new London Plan should provide a significant opportunity to enhance biodiversity and access to nature, and improve the environment for existing and future generations. However there are some tensions between your environmental ambition and the delivery of the housing targets. We consider that they are mutually dependent, both needing to be delivered to achieve great places for people to live, work and thrive.

The government's Environment Plan, ([A Green Future: Our 25 Year Plan to Improve the Environment](#)), January 2018 sets out the government's aims to improve the environment, within a generation. We are pleased to see that a number of the draft London Plan's spatial policies will support the government's 25 year Plan. We suggest

that there is scope for further alignment of London Plan policy with these national objectives, which will in turn benefit London's environment and people.

Included within the draft London Environment Strategy (LES) are a number of key targets to be realised through London Plan policy. Proposals of particular relevance include 5.1.1b, c and d. Whilst we acknowledge that the LES is currently in draft format, we are hopeful that the finalised version will reflect our response to that document. Given the unprecedented levels of development described within the draft London Plan, it is important that the strong environmental aspiration of the LES is fully recognised and reflected within the London Plan policies. We have made a number of recommendations for amendments to Policy within the London Plan set out below in our full response which we think are important for delivery of the Mayor's National Park City aspiration.

We are keen to continue to work with your officers, partners and the London Boroughs to ensure new development is environmentally sustainable, and to plan for future infrastructure to support the needs of London's growing population.

Impacts of climate change are already being seen with the country experiencing more extreme weather patterns. It is vital that planning decisions are made in the context of these impacts, in addition to reduced natural resources and limited environmental capacity, and that decision-makers look to the benefits of maintaining and improving a healthy environment.

The emphasis of residential development in the new draft Plan is orientated towards the suburbs to a greater extent than has previously been the case. London's suburbs contain a great number of designated sites, and the extent and distribution of important or sensitive biodiversity features, non-statutory sites and other biodiverse greenspace is also significant. Therefore we believe that implementing the approach outlined in the plan will require ambitious environmental policy, which our recommendations are intended to support.

## **Summary of our response**

### **Strategic and landscape scale thinking**

The London Plan has a key role to play in setting the framework both for future collaboration between authorities within London, and with authorities outside of London across the wider South East (WSE). Safeguarding and enhancing the value of London and the WSE's greenbelt, protected landscapes and green infrastructure into the future will require effective cross-boundary collaboration with authorities in the immediate vicinity of Greater London. However, whilst the Plan is supportive of region-wide collaboration on economic and housing issues, a strategic view on biodiversity, landscapes and green infrastructure, all of which are fundamental to the delivery of good growth, is not so clearly identified. We believe these environmental aspects are also best considered on a region-wide basis in tandem with collaboration on development. In order for such region-wide work to be successful, we believe that it is essential for London to play a proactive and leading role in the formation of a network of regional stakeholders, including planning authorities, non-governmental organisations and statutory consultees, to strategically and collaboratively plan for biodiversity, landscapes and green infrastructure delivery in anticipation of the levels of development in the South East. Natural England would be keen to work collaboratively on progressing this opportunity.

Major areas of re-development, including Opportunity Areas, provide unique opportunities to increase green cover and enhance biodiversity within London. We note that whilst the Plan describes opportunities for enhancing the economic and social sustainability of Opportunity Areas, environmental sustainability could be more fully integrated within this Policy (SD1). In particular, our recommendations support a review of this policy for the purposes of identifying specific key opportunities for the provision of strategic green infrastructure in order to fully reflect its integral role in sustainable development.

### **Development, biodiversity and ecosystem services**

Increasing overall green cover and improving ecological resilience within London will require strong policies to protect and enhance existing greenspace; proactively create new areas of biodiverse, high-quality greenspace, and direct required development towards areas of least environmental value. To this end we are broadly encouraged by the measures within the plan which emphasize development on brownfield sites of low ecological value, around town centres and opportunity areas, and we support the steps taken towards ensuring that major development within these areas contributes to urban greening.

The general direction of the plan to promote the best use of land whilst maintaining strong protection for existing designated sites is also positive. The use of the mitigation hierarchy to ensure that impacts to biodiversity are first avoided, minimised, mitigated, and only then compensated for is crucial in maintaining and enhancing the capital's biodiversity. Nevertheless, given the immense pressure for land within London, ambiguity with regards to biodiversity should be minimised as far as is possible, in order to avoid a large cumulative loss in biodiversity value through individual planning decisions. To this end we strongly recommend that the plan include a measure to ensure that *all* development results in a net gain in biodiversity. This would not only be consistent with the first measure in the 25 Year Environment Plan and Paragraph 109 of the NPPF, but would also provide direction with regards to the net gain commitments already made by a number of Boroughs and other organisations within London, such that they become the norm rather than the aspiration.

In order to maintain the flow of benefits provided by ecosystems, including features provided through urban greening, it is important to secure appropriate funding for management. Options for obtaining this should be made more explicit within the plan. Furthermore, options for public greenspace which promote access and increased ecological interest whilst delivering a reduction in management costs should also be encouraged.

The London Plan should also recognise and anticipate opportunities for creation of greenspace which may arise through policy shifts within the plan. The strong focus on reducing car usage, and promoting healthy forms of public transport, may lead to some road and parking areas becoming redundant with concomitant opportunities arising for the provision of new green, publically accessible space. The meanwhile use of sites for temporary gardens or allotments could similarly make a significant contribution towards ecological connectivity within the city.

### **Access to nature: People at the Heart**

It is important that the plan provides the right policy balance to safeguard existing public and private greenspace at a time of great development pressure. This development needs to reinforce landscape character and sense of place whilst ensuring nature and all

the benefits it delivers continues to flourish and grow in London. The current draft introduces some uncertainties in this regard that require further clarification.

We fully recognise the need for the Mayor to think innovatively to provide the homes which London requires, and the need to make best use of land in order to ensure that these homes are built. Ambient, street-level greenspace and natural features are integral to promoting sustainable development and good growth by supporting mental and physical well-being and providing ecosystem service benefits. As such we welcome recognition that development on small sites will have to compensate for any lost greenspace, however we note that compensatory provision would not necessarily be like-for-like. Indeed, unless protected against, we are concerned that the range of development policies within the plan, including the emphasis on small sites, may lead to a net loss of *publicly accessible street-level greenspace*, and it has not been demonstrated that this eventuality has been anticipated within the Plan. Compensation for lost street-level greenspace through the provision of less-accessible areas or features will likely lead to a reduction in levels of access to greenspace. This in turn may exacerbate inequalities in access to the well-being benefits provided by greenspace in certain areas, as well as reduce ecological connectivity. We would like to see this risk fully mitigated in the final London plan.

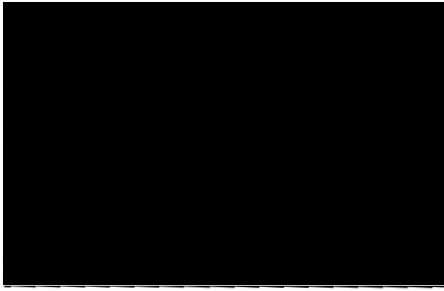
The scale of required development within London will cause its character to evolve over time. However, in order to maintain a sense of place and protect London's townscape, continuity of character should be supported. In new areas of development, distinctive and biodiverse green infrastructure can play a key role in establishing a sense of place, and can support the Healthy Streets approach.

The role of strategic walking routes, including the Thames Path National Trail, Green Chain and Capital Ring, in providing access to nature, as well as contributing towards the Mayor's ambition to increase the permeability of London to travel by foot, deserves full recognition within the plan. In particular, continued support for the extension of the Thames Path National Trail to join with the English Coast Path, is vital to ensure that the recreational benefits of this asset are fully realised.

Our comments span a broad range of issues, and we have not referred to all in this letter. Please consult our full response below, which provides detailed comments *and* recommendations on a policy by policy basis, which we hope will be incorporated into a revised version of the new London Plan. We have also provided comments on the draft Habitats Regulations Assessment (HRA) and Integrated Impact Assessment (IIA), which can be found in Appendices 1 and 2 respectively.

Thank you for the opportunity to provide input to the London plan. Please contact Chris Baines (Chris.Baines@naturalengland.org.uk) if you require further clarification of any points made.

Yours sincerely



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## Natural England response to the consultation on the draft London Plan 2017

Policy	Natural England's response
<p><b>Planning London's Future</b></p>	
<p>GG1 – Building strong and inclusive communities</p> <p>Page 12</p>	<p>We welcome the emphasis on building inclusive communities, and would like to highlight the vital role that well-designed green infrastructure, including high quality public greenspace, can play in facilitating social integration, creating a sense of place, and increasing the permeability and inclusivity of neighbourhoods.</p> <p><b>Recommendation:</b>  <i>We recommend that Paragraph 1.1.4 is amended to read ; 'Delivering good quality, affordable homes, better public transport connectivity, accessible, <b>green</b> and welcoming public space, a range of workspace in accessible locations, and social, physical and environmental infrastructure that meets London's diverse needs is essential if London is to maintain and develop strong and inclusive communities.'</i></p>
<p>GG2 – Making the best use of land</p> <p>Page 14</p>	<p>We support the measure within Paragraph D of this policy to ensure that planners protect designated local conservation sites, and promote the creation of new green infrastructure and urban greening. However, it is our opinion that the current national policy context (NPPF, paragraph 109) and drive to secure environmental net gains through planning (25 Year Environment Plan), and a growing number of commitments from organisations and Boroughs provide a clear and strong rationale for embedding a biodiversity net gain approach for all development within London. Our comments on Policy G6 provide our detailed thoughts on this matter, however we believe that this approach could be strengthened by referring to biodiversity net gain within this policy.</p> <p><b>Recommendation:</b>  <i>We recommend that Point D of this policy is amended to read: '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 <b><u>which contribute to securing net biodiversity gains</u></b>'.</i></p> <p>We support the emphasis of development on brownfield sites, however this approach could be strengthened by clarifying that <i>'development and densification should be directed towards land of</i></p>

	<p><i>least environmental value, which contributes least to the provision of essential ecosystem service benefits.</i>, including provision of biodiversity, physical and mental well-being, integrated water cycle management, and adaptation to climate change impacts.</p> <p>We welcome the recognition in Paragraph 1.2.6 of the objective to deliver 50% greenspace across London. Achieving this in the context of substantial growth in housing demand will be a significant challenge. Please refer to our comments on policies H1, H2 and G5, which relate to the interaction between development and the achievement of this green cover target.</p>
<p>GG3 – Creating a healthy city Page 16</p>	<p>Access to greenspace and nature is vital to maintain mental and physical health, and therefore a deficiency in access to either greenspace or nature has the capacity to exacerbate existing health inequalities. We support point E of this policy, which acknowledges the role that greenspace can play in maintaining and improving health by promoting the improvement and provision of new green infrastructure.</p> <p>With increased density, existing and new greenspaces will need to be designed to accommodate greater numbers of people as well as working for biodiversity. Please refer to our comments on Policy D6.</p>
<p>GG4 – Delivering the homes Londoner’s need Page 18</p>	<p>Natural England recognises the need to significantly increase the delivery of homes in London. Achieving the target of 65,000 new homes per year across London, whilst at the same time increasing overall green cover to over 50%, increasing access to nature and greenspace, enhancing ecosystem service provision, and providing a net gain in biodiversity constitutes a significant challenge.</p> <p>We believe that the recommendations we provide for policy within Chapters 2, 4 and 8 in particular are integral to ensuring that these and other environmental targets are not compromised by meeting anticipated housing demand.</p> <p>We note the new emphasis on the use of small sites for housing provision, and would like to highlight that adequate consideration should be given to the environmental impacts of development of these sites, which may cumulatively have a very significant effect on ecosystem service provision, including biodiversity and access to nature. Please refer to our comments on Policy H2 for our recommendations on this matter.</p>

<p>GG5 – Growing a good economy</p> <p>Page 20</p>	<p>Economic activity within London and elsewhere is ultimately dependent on a healthy and resilient natural environment that provides amongst other things adequate supply of fresh water, clean air and green space, which are vital for ensuring the health and well-being of employees. Safeguarding and enhancing the provision of these benefits is therefore vital to ensure continued and growing economic activity within London, and this is recognised within the natural capital approach outlined in London Environment Strategy.</p> <p><b>Recommendation:</b> We recommend that this policy include additional text which references the value of green infrastructure to London’s economy, and which makes provisions to ensure that the estimated economic benefits of green infrastructure are fully taken into account by Boroughs when making planning decisions.</p>
<p>GG6 – Increasing efficiency and resilience</p> <p>Page 22</p>	<p>We support the Mayor’s aim for London to be more efficient and resilient. As per our comments on Policy GG5, a healthy and resilient natural environment is key to achieving the aims of this policy.</p> <p><b>Recommendation:</b> As per the Environment Agency’s response to this policy, we recommend that paragraph 1.5.5 highlights the role of green infrastructure in securing a zero carbon city, which would also contribute to achieving green cover targets, and would support the policies in chapter 8.</p>
<p><b>Spatial Development</b></p>	
<p>SD1 – Growth Corridors and Opportunity Areas (OAs)</p> <p>Page 28</p>	<p>Protecting biodiversity, enhancing ecosystem service provision and improving access to greenspace often require effective cross-boundary collaboration, and solutions can often be identified at a strategic level. Therefore opportunities for the provision of strategic green infrastructure should be fully embedded within this policy. We <b>recommend</b> that SD1 A 1 b) includes green infrastructure (GI) i.e. ‘assist in delivering specific infrastructure requirements, including green infrastructure that unlock the capacity for new homes and jobs’. This policy identifies specific interventions necessary for the social and economic sustainability of given Opportunity Areas. Environmental sustainability, including the protection, provision and enhancement of green infrastructure, warrants equal consideration as the key third element of sustainable development.</p> <p>Planned GI provides a major contribution to sense of place, health and well-being, access to nature and community cohesion, and, as an essential function of strategic urban planning, we believe it is</p>



crucial that this policy also identifies specific opportunities where the provision of green infrastructure in Opportunity Areas would significantly ameliorate or improve access to greenspace, maintain or enhance the flow of essential ecosystem service benefits, and/or significantly enrich biodiversity. Maintaining a vision of London as a National Park City provides a strong impetus to plan for strategic green infrastructure.

Natural England is keen to continue its contribution to shaping OA's (examples include: Old Oak/Park Royal, Thamesmead, Croydon and Lee Valley) but would like to underline that it is vital that Green Infrastructure opportunities are recognised and delivered in all OA's. Local GI strategies, local plans and OA Masterplans should recognise the need to incorporate GI and access to nature as a key element of delivering 'good' growth.

**We recommend:**

- 1) An additional paragraph under point A. 6) of this policy to read '*ensure that Opportunity Areas contribute to the provision of strategic green infrastructure, making sure that this is fully considered throughout the master-planning process*'
- 2) An additional paragraph of supporting text under paragraph 2.1.5 to read '*The provision of appropriately located green infrastructure is integral to creating sustainable, healthy and vibrant places to live. Development through the Opportunity Area framework should make a substantial contribution to the provisions of green infrastructure by planning for GI provision at a strategic level. This wider view gives OAPFs a unique opportunity to provide new green infrastructure which makes the greatest contribution to the wider objectives of alleviating deficiency in access to nature and greenspace, improving the coherence of London's ecological network, and improving the flow of other ecosystem service benefits. Planners involved in Opportunity Area planning should refer to the All London Green Grid when making decisions relating to the provision of strategic green infrastructure. This would support the objectives of Policy G1*'.
- 3) A review of the sections of supporting text relating to specific growth corridors, with reference to the All London Green Grid, to identify specific opportunities for OAs to make substantial contributions to wider environmental objectives through the provision of strategic green infrastructure.

**Lee Valley OA**

We note that paragraph 2.1.31 references the Epping Forest SAC, but not the Lee Valley SPA and Ramsar site. Therefore **we recommend** that this paragraph is amended to read: '*Planning*

	<p><i>frameworks should include an assessment of any effects on the <b>Lee Valley Special Protection Area and Ramsar site</b>, and Epping Forest Special Area of Conservation and appropriate mitigation strategies.’ Please refer to our response to the draft Habitats Regulations Assessment (Appendix 1) for our full thoughts on this Lee Valley SPA.</i></p>
<p>SD2 – Collaboration in the Wider South East</p> <p>Page 57</p>	<p>Natural England welcomes the GLA acknowledgment that collaborative working across the WSE or the City Region is essential to fully address the opportunities and challenges faced by the whole area over the next 25 years. We feel it is essential that London and the WSE must think and plan land use strategically and spatially to safeguard landscapes, biodiversity and access to nature whilst accommodating the growth agenda. We believe that this cross border landscapes scale approach to environmental forward planning should be more strongly reflected in the policy wording within the London Plan. Natural England is keen to help facilitate and shape thinking with the GLA and other WSE organisations (including Protected Landscapes (National Parks and Areas of Outstanding Natural Beauty)) around this opportunity. We feel that the London Plan can and should set the tone for this wider collaborative conversation to safeguard and plan for the future of the natural environment both within London and across the WSE and that this role plays strongly to the Mayors aspiration to become a National Park City.</p> <p><b>Recommendation:</b>  <i>E The Mayor will work with WSE partners to find solutions to shared strategic concerns such as: strategic planning <b>and management of landscapes and green infrastructure</b>, barriers to housing and infrastructure delivery (including ‘smart’ solutions - see also paragraph 9.6.7); factors that influence economic...’</i></p>
<p>SD3 – Growth Locations in the Wider South East and beyond</p> <p>Page 61</p>	<p>Natural England supports the Mayor’s aspiration to work with relevant WSE partners, Government and other agencies to realise the potential of the wider city Region. We believe that it is essential that the natural environment and related environmental infrastructures is recognised explicitly as a core aspect of this strategic infrastructure planning and investment and is central to London and the WSE helping the City Region realise it full potential.</p> <p><b>Recommendation:</b>  <i>A The Mayor will work with relevant WSE partners, Government and other agencies to realise the potential of the wider city region and beyond through investment in strategic infrastructure (<b>including environmental/green infrastructure</b>) to support housing and business development in growth locations to meet need and secure mutual benefits for London and relevant partners.</i></p>

<p>SD4 – The Central Activities Zone</p> <p>Page 66</p>	<p>We note that the target for a 5% increase in green cover in the CAZ within the current London Plan (2016) has been lost. We <b>recommend</b> that a similar aspiration is carried through to this plan. The central London Business Improvement Districts have led by example, undertaking green infrastructure audits and subsequently delivering identified GI interventions benefitting people, the environment and the local economy. The GI delivery addresses local priorities such as surface water flooding, air quality, health and well-being, providing habitat using features like rain gardens, retrofitting living roofs and green walls, and greening healthier walking routes. These interventions have demonstrated that an increase in green cover is eminently achievable even within exceedingly high density environments within the CAZ. We <b>recommend</b> that these initiatives are encouraged through additional supporting text within this policy.</p>
<p>SD7 – Town Centre Network</p> <p>Page 81</p>	<p>It is our opinion that this policy could contribute to green infrastructure provision, by including measures to encourage the creation or enhancement of GI along cycling and walking routes.</p> <p>Given that the plan encourages densification around areas with high levels of public transport provision, it is likely that maintaining and enhancing access to greenspace within these areas will be crucial. Following the examples presented by Greening the BIDs there are many opportunities for greening within town centre that can provide environmental benefits and support the local economy.</p>
<p><b>Design</b></p>	
<p>D1 – London’s form and characteristics</p> <p>Page 98</p>	<p>Natural England supports the measures to maximise urban greening through development design within this policy. We would also <b>recommend</b> an additional measure under B of this policy to make provisions for development design to seek opportunities for the incorporation of features to support biodiversity, including swift bricks, bat boxes and house sparrow terraces.</p> <p>When taken together, the form of London’s buildings and open spaces generate a distinctive landscape character. The design of new development within London, and the construction of tall buildings in particular, has the capacity to impact upon the London’s landscape character.</p> <p><b>We recommend:</b></p> <ul style="list-style-type: none"> <li>- 1) An amendment to the text of B.1 to read ‘<i>Development design should... respond to local context and the wider character of London’s landscape by delivering buildings and spaces</i></li> </ul>

	<p><i>that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions,</i></p> <ul style="list-style-type: none"> <li>- 2) An amendment added to the end of paragraph 3.1.2 to read ‘...Creating a comfortable pedestrian environment with regard to levels of sunlight, shade, wind, and shelter from precipitation is important. <b>The Landscape Institute’s <a href="#">Townscape Character Assessment methodology</a> and Natural England’s <a href="#">‘London’s Natural Signatures’ report provide useful resources to inform these evaluations, and planners should therefore be referred to these documents.</a></b></li> </ul>
<p>D2 – Delivering good design Page 102</p>	<p>Existing and newly provided greenspace will need to be designed to cater to higher densities of people whilst minimising impacts on biodiversity. Please refer to our comments on Policy D6 below for our recommendation on this matter.</p>
<p>D6 – Optimising housing density Page 117</p>	<p>Existing greenspace and newly provided greenspace will need to be designed to cater to higher densities of people, providing very high levels of accessibility whilst minimising impacts on biodiversity. Good design can drive both better use of green space, and better resilience of biodiversity within greenspace to additional recreational pressure. Therefore, we <b>recommend</b> that an additional paragraph is incorporated into the supporting text below 3.6.5 to read: ‘<i>The capacity for existing greenspace to absorb increased pedestrian density should be assessed through development, and design alterations made where necessary to improve accessibility and minimise the impact of recreational disturbance on biodiversity. New greenspace provided through development should also be designed so as to support high accessibility whilst also providing high levels of biodiversity.</i></p> <p>We acknowledge that the scale of development needed to meet housing demand is likely to lead to the changes in the character of certain areas within London. The emphasis on small sites through this Draft Plan in particular may lead to increased density of housing. However, continuity of or improvements in character (where this would not be to the detriment of established local - communities) should be sought wherever possible. We would encourage the Plan to consider the use of the <a href="#">Townscape Character Assessment</a> methodology where there are concerns about changes in character resulting from densification.</p>
<p>D7 – Public realm</p>	<p>We support part H of this policy, which makes provisions for development proposals to incorporate green infrastructure into the public realm to support rainwater management through sustainable</p>

<p>Page 122</p>	<p>drainage, reduce exposure to air pollution, manage heat and increase biodiversity. We would like to highlight that incorporating features of biodiversity interest into public spaces may encourage people to spend greater amounts of time in these areas, facilitating increased social integration and creating a sense of place, and <b>recommend</b> that this is listed as a benefit under part H.</p> <p>Part K of this policy makes provisions for the use of meanwhile sites as temporary public realm. As per our comments on Policy H4, we support the use of meanwhile sites for community greenspace or allotments.</p> <p>We support part L of this policy, which ensures that there will be space provided for green infrastructure within carriageways.</p>
<p>D8 – Tall buildings</p> <p>Page 126</p>	<p>We agree with the text in Paragraph 3.8.8 relating to the impact of tall buildings on bird flight lines. In order to avoid ambiguity we <b>recommend</b> that this text is instead grouped with other environmental considerations in C.3.c of the policy under ‘environmental impact’.</p> <p>We support the measure outlined in C.1.a to consider the long-range visual impacts of tall buildings, which have the capacity to affect landscape character, to be taken into consideration during plan making.</p>
<p>D13 – Noise</p> <p>Page 139</p>	<p>Demolition and construction-related noise has the capacity to result in impacts on wildlife, particularly in proximity to sites which support noise sensitive species. Suitable, evidence-based mitigation should therefore be undertaken in instances where noise impacts on wildlife are anticipated. Therefore we welcome the reference in paragraph 3.13.1 to internationally important nature conservation sites, however we <b>recommend</b> an amendment to the text to read ‘<i>Consideration of existing noise sensitivity within an area is important to minimise potential conflicts of uses or activities, <b>including</b> in relation to internationally, <b>nationally and locally</b> important nature conservation sites which contain noise-sensitive species. <b>In such circumstances, appropriate measures should be sought to fully mitigate any anticipated impacts which cannot otherwise be avoided</b>’.</i></p>
<p><b>Housing</b></p>	
<p>H1 – Increasing Housing Supply</p>	<p>Natural England recognises the need to increase housing supply in London to meet anticipated housing demand.</p>

<p>Page 144</p>	<p>Natural England notes and supports the absence of references to types of sites which would typically be expected to harbour high levels of biodiversity as suitable for housing development within this policy. However, we <b>recommend</b> a cross-reference to Policy G6 within the supporting text of this policy to clarify that there should be a general presumption against development on SINC land.</p> <p>Development on the listed types of brownfield sites within this policy is in many cases likely to lead to lower impacts on biodiversity than development on greenfield sites, and Natural England is therefore broadly in favour of this emphasis for development. However we would like to highlight that in some contexts brownfield sites support high levels of biodiversity and should therefore be appropriately surveyed.</p> <p>We <b>recommend</b> an addition to this policy stating that development should be directed towards brownfield sites of least environmental value, as would be in line with Paragraph 111 of the NPPF.</p> <p>Note: our comments on Policy G6 support the inclusion of a biodiversity net gain approach for development within London. If Policy G6 is amended to include this measure, we <b>recommend</b> that the supporting text of this policy include a cross-reference to the amended policy to ensure that all housing development result in a net gain in biodiversity (please see out comments on Policy G6 for further detail).</p>
<p>H2 – Small sites</p> <p>Page 152</p>	<p>Natural England acknowledges the contribution that small sites can make to the provision of housing in the right circumstances. However, we have a number of concerns regarding the impact the emphasis on the use of small sites on biodiversity and ecosystem service provision.</p> <p>Cumulatively, the emphasis on the use of small sites for housing may result in the loss of a substantial area of vital street level greenspace. Whilst the supporting text for this policy makes a provision to ensure no net loss of overall green cover, with its current wording we are concerned that compensatory provision of green roofs and street trees will result in a significant net loss of <i>publically accessible street-level</i> greenspace. In particular, publically accessible SINC, pocket parks and amenity greenspace may be susceptible to loss through this policy.</p> <p>Green roofs have the capacity to provide a wide variety of environmental benefits, including supporting biodiversity, mitigating the urban heat island effect, and decreasing run-off rates, and as such we would generally support their use. However their relative inaccessibility and remoteness in</p>

relation to pedestrians at street-level means that they are often not of equivalent value in relation to the provision of vital mental and physical well-being benefits derived from ambient street-level greenspace. Furthermore, street-level greenspace facilitates far greater habitat connectivity for terrestrial species, and therefore the proliferation of roof-level green space in order to compensate for the loss of street-level greenspace may result in a substantial net decrease in accessibility to greenspace, mental well-being, and connectivity for terrestrial species. We **recommend** that a new measure is incorporated into Policy H2 to ensure that in areas where there is an existing deficiency in these benefits, Boroughs should consider carefully whether this type of compensation is appropriate by weighing the relative need for and deficiency in benefits provided by different types of green infrastructure, and like-for-like (in terms of accessibility) compensation should instead be sought wherever possible.

In limited circumstances, well designed and maintained, high quality greenspace, as part of a strategic green infrastructure intervention can provide a more useable and appealing space for the community which could offset a spatial loss. This should generally only be considered where the new greenspace would provide a net gain in biodiversity, accessibility and ecosystem service provision.

Regardless of the nature of compensatory green cover provided, developments on small sites should aim to maintain existing features that are rich in urban wildlife, especially birds and invertebrates that frequent scrubby, early succession woodland and open mosaic habitat.

The design of any new development on small sites should aim to include:

- high quality publicly accessible greenspace wherever possible;
- specific habitat creation in response to existing species and to attract other species e.g. bespoke living roofs and walls (where appropriate in line with our advice above), bird and bat boxes incorporated into built structures, rain gardens, wildlife ponds, nectar rich planting within accessible greenspace and planting of native species.

These features will contribute towards providing a net gain in biodiversity through development (please refer to our comments on Policy G6). Layouts should aim to retain or enhance connectivity of habitat and walking routes.

In light of the removal of the KPI for loss of SINC land for development, we are also concerned that the impact of the developmental plans on loss of SINC would not be effectively assessed, and there would therefore be no impetus for future revision of policy if necessary.

	<p>Furthermore, in the absence of a measure for Boroughs to include a presumption against garden development through local planning policy, as is included in Policy 3.5 of the current London Plan (2016), there is significant scope for garden greenspace to be lost under current policy. Given that private gardens currently constitute approximately <a href="#">30% of existing greenspace in London</a>, this focus is therefore likely to work against the achievement of the Mayor’s target to achieve 50% green cover across Greater London as outlined in the Draft London Environment Strategy unless adequate compensatory green cover provision is assured in all cases. This is especially important when considering that Policy G5 – Urban Greening Factor applies only to major development. The Wildlife Trust, Greenspace information for Greater London and the GLA have undertaken a <a href="#">study assessing the impact of the loss of garden land</a>, which notes that between 2005 and 2008, the contribution of residential development to loss of garden greenspace was relatively small . Under this policy it is possible that its contribution will grow substantially</p> <p>In order to ensure that development on small sites results in no net loss of accessible greenspace, and a net gain in ecosystem services and biodiversity and where possible (as would be in line with Policy 109 of the NPPF), we propose the following amendments to this policy:</p> <ul style="list-style-type: none"> <li>- A clarification should be added to state that <i>‘publically accessible, street-level, ambient greenspace and green features should generally be preferred as compensation for loss of greenspace to inaccessible, non-street level greenspace, especially in areas where deficiency in access to nature and greenspace is already high or where connectivity for terrestrial species is already low’</i></li> <li>- This measure should be outlined within the policy box, in order to avoid ambiguity as planning decisions are made</li> <li>- A cross-reference to Policy G1 should be made within the supporting text, to state that <i>‘Boroughs should take into account the relative need for and deficiency in benefits provided by different types of green infrastructure when considering compensatory greenspace provision, and like-for-like (in terms of accessibility) compensation should be sought wherever possible’</i></li> </ul>
<p>H4 – Meanwhile use</p> <p>Page 160</p>	<p>Natural England believes that there is an opportunity to support the use of suitable meanwhile sites, which can exist for a number of years before development begins in earnest, as locations for community greenspace or allotments. In the intervening period between planning permission and construction these sites may contribute towards providing habitat connectivity and promoting community involvement in the management of greenspace, as would be in line with Environment Strategy policies 5.2.1c and 3.1.1f. As such we would encourage the addition of text to support this</p>



	aim within this policy. Examples of where this has been done include ‘the Skip garden’ at King’s Cross and Mobile City Garden Stratford.
<b>Social Infrastructure</b>	
S1 Developing London’s social infrastructure Page 202	We welcome the recognition of green infrastructure as a part of Social infrastructure in Paragraph 5.1.1. As GI is capable of acting as the setting for many aspects of social infrastructure we <b>recommend</b> that Policy S1 includes a further point to read ‘ <i>H: Green infrastructure should be considered a delivery vehicle to meet aspects of social infrastructure</i> ’.  5.1.5: Alternative uses could include specific reference to green infrastructure use such as open space and community gardens.
S2 - Health and social care facilities Page 204	The health and well-being benefits of green infrastructure could be better reflected within this policy. Integrating healthcare facilities with green infrastructure can enable use of greenspace for health walks, green gyms and quiet reflection.  <b>We recommend:</b> - An addition to paragraph 5.2.8 to state that green infrastructure incorporated around healthcare facilities can enable uses which can support recovery.
S5 Sports & Recreational facilities Page 214	5.5.2 Replacement of grass pitches with artificial grass pitches could impact on the function of GI in some areas. In such cases, the margins and boundary areas should be designed and managed to mitigate for this by providing biodiversity, flood alleviation or other benefits depending on the context.
S7 – Burial space Page 219	5.7.4 and 5.7.5 - We support the integration of woodland or parkland burial grounds into the wider accessible green infrastructure.
<b>Economy</b>	
E1 – Offices Page 224	As with other forms of development, green infrastructure should be included in office areas wherever possible, building on the work of Greening the BIDs. Options include retrofitting (or incorporating into new builds) pocket parks, green roofs and walls, healthier walking routes and rain gardens. Interventions have indicated benefits such as <a href="#">employee satisfaction and desirability of premises</a> .

E5 - Strategic Industrial Locations (SIL) Page 239	Some of the SIL are close to sites of high environmental value including Lee Valley, and Wandle Valley Regional Parks. Environmental considerations should be enshrined in the development and operation of the SILs.
E11 - Skills and opportunities for all Page 263	We <b>recommend</b> that this policy references expanding opportunities to develop skills for creating and maintaining green infrastructure, as would routinely be provided by development through emerging urban greening measures, in order to retain a high quality resource.
<b>Heritage and Culture</b>	
HC1 – Heritage conservation and growth Page 268	<p>We support the inclusion of landscapes within this policy together with the recognition of the role of this in place-making.</p> <p>We are pleased to see historic hedgerows and ancient woodland included in the list of heritage assets within paragraph 7.1.2, and we <b>recommend</b> that <b>veteran and ancient trees</b> are added. Including a reference to the <a href="#">Ancient Woodland inventory</a> could also assist planners in identifying larger areas of ancient woodland.</p>
HC2 – World Heritage Sites Page 278	We welcome the inclusion of setting and buffer zones for world heritage sites.
HC5 – Supporting London’s culture and creative industries Page 287	<p>We welcome the inclusion of space for cultural events. <b>We recommend</b> these be included in strategic green infrastructure plans.</p> <p>Meanwhile spaces can also be ‘greened’ to provide a pleasant accessible open space where events can take place.</p>
HC6 – Supporting the night-time economy Page 292	When opening up greenspace to 24 hour use care should be taken to respect the existing wildlife habitats. For example, limiting lighting where appropriate to retain dark corridors for wildlife.
<b>Green Infrastructure and Natural Environment</b>	
G1 - Green infrastructure Page 302	Natural England supports the inclusion of this policy, but notes that the scope of this policy has not been enhanced in relation to Policy 2.18 of the current London Plan (2016), to which it is functionally similar, and therefore the new policy does not reflect the scale of ambition set out in the Draft London Environment Strategy.

We support the measure to direct development plans and Opportunity Area Planning Frameworks to identify GI assets and consider additional interventions. However, as a regional planning document, the London Plan should identify and support specific opportunities for cross-boundary connected green infrastructure provision, particularly across areas undergoing significant development or regeneration, such as in growth corridors. We advise that the Plan defines areas where high quality green infrastructure could be created to provide maximum benefit in terms of ecosystem service provision, access to greenspace, and connectivity for wildlife, particularly in relation to Opportunity Areas as outlined in Chapter 2 of the draft Plan. Please refer to our comments on policy SD1 for further comments and recommendations on this issue.

We welcome the wording to 'protect' green infrastructure, but would like to see greater detail and guidance for Boroughs regarding the circumstances in which development which may harm existing GI should be refused, such that development will not result in the loss of ecosystem service benefits provided by GI. In particular, this policy should clearly define the term 'unacceptable loss' [of the benefits of existing local green infrastructure], as used in Proposal 5.1.1b of the London Environment Strategy. As per our recommendations for Policy G6, we believe that the plan should establish a biodiversity net gain principle for all development, and this should similarly apply to other benefits provided by GI wherever possible to provide 'environmental' net gain. As such, it is our opinion that both a net loss in biodiversity and a net loss in ecosystem service provision should not be deemed acceptable.

Boroughs should consider how the provision of new green infrastructure, including in circumstances in which development resulting in unavoidable loss of existing green infrastructure, particularly on small sites, creates the need for compensatory provision, will affect the local need for, deficiency in and access to various benefits provided by different kinds of green infrastructure, and that a like-for-like replacement (in terms of accessibility) should be sought wherever possible.

Certain kinds of GI may require management after their creation in order to maintain levels of ecosystem service provision, however no provisions are currently made for management of newly created GI. It is our opinion that the draft Plan should include Policy wording to ensure that newly created GI secures an appropriate source of funding for management in line with Environment Strategy Policy 5.3.1 through either developer contributions or securing investment from elsewhere. Please refer to our comments on Chapter 11 for our recommendations on this matter.

	<p><b>We recommend:</b></p> <ul style="list-style-type: none"> <li>- 1) An additional section of policy to read ‘<i>Development plans should make provisions to ensure increased delivery of the benefits of green infrastructure through development. A net loss in the provision of benefits provided by green infrastructure through development should not generally be considered acceptable.</i>’</li> <li>- 2) Additional supporting text stating that ‘<i>When making provisions for the creation of new green infrastructure, including through green infrastructure strategies, and in circumstances where unavoidable loss of existing green infrastructure creates the need for compensatory provision, Boroughs should support those types of green infrastructure which would be most appropriate to local circumstances, taking into account the need for, deficiency in, and access to the full range of benefits provided by green infrastructure within the area.</i>’</li> </ul> <p>Please also refer to the Environment Agency’s response to this policy, including in regards to the adoption of best practice principles for net gain approaches.</p>
<p>G2 – London’s green belt</p> <p>Page 303</p>	<p>We support the proposals to improve the quality and function of the green belt. However we would also <b>recommend</b> that recognition should be given to the fact the greenbelt extends beyond the GLA boundary into the wider City Region. As such it is important to plan and consider its management and opportunities for improved delivery of biodiversity and natural capital at the landscape scale. London Boroughs need to work closely with neighbouring planning authorities to ensure this join up and to realise where strategic opportunities for environmental gains exist.</p> <p>There is an opportunity through the WSE and GLA forum (noted in SD2, SD3) to consider strategic management of and investment in greenbelt, protected landscapes and other strategic green infrastructure. This is particularly relevant in light of future plans for public investment in land management that delivers ‘public goods’. A strategic approach to help maximise this opportunity should be considered. Natural England would be keen to help facilitate this conversation.</p>
<p>G3 – Metropolitan Open Land</p> <p>Page 304</p>	<p>We support the proposals to improve the quality and function of MoL. Were the Plan to include a measure to support net gains in biodiversity, as per our response to policy G6, this may have the capacity to drive significant investment into MoL for enhancement of GI and provision of ecosystem services.</p>

<p>G4 – Local green and open space</p> <p>Page 305</p>	<p>We support the measures in this policy to protect greenspace, create new greenspace and address deficiency in access to greenspace. However we note that the content of this policy is functionally similar to Policy 7.18 of the current London Plan (2016), and could be significantly improved in order to better reflect the objectives and proposals in the draft London Environment Strategy.</p> <p>We strongly recommend that greater weight is given to the consideration of accessibility in relation to greenspace, and that when providing compensation for lost greenspace, publicly accessible, street-level greenspace should generally be provided in preference to inaccessible or less accessible areas particularly in areas deficient in access to greenspace. This is particularly important given that accessibility is vital for community involvement in greenspace management and improvement (as per Environment Strategy proposal 5.1.1f).</p> <p>We support the use of bespoke green roofs where they would provide the greatest benefit in terms of ameliorating local needs for and deficiencies in ecosystem service provision, including biodiversity value, hydrological considerations, mental well-being, accessibility for play space, gardens and food growing. .</p> <p><b>We recommend:</b></p> <ul style="list-style-type: none"> <li>- 1) Part E.2 is re-worded to clarify that green infrastructure should be planned for in all circumstances, particularly in areas with the potential to undergo substantial change.</li> <li>- 2) The policy clearly set out types of sites to be included in a protected greenspace network and afforded protection from development (in addition to green belt land and MoL).</li> <li>- 3) An amendment to part D of this policy to read '<i>The loss of green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision, <b>particularly in terms of accessibility</b>, should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.</i>'</li> </ul> <p>Please also refer to the Environment Agency’s response to this policy, particularly in regards to the potential for cross-boundary joint green infrastructure strategies.</p>
<p>G5 – Urban greening</p> <p>Page 308</p>	<p>Natural England strongly supports the measures included in this policy for major development to contribute to urban greening. Measures such as this are vital in ensuring that the target to increase green cover in London to over 50%, as outlined in the draft London Environment Strategy, are met. However, the policy should be significantly strengthened as, in its current form, the policy does not</p>

guarantee that development will contribute to an increase,, and indeed has the capacity to lead to a net loss of, green cover because the policy does not take account of baseline green cover, and therefore could conceivably result in a net loss of green cover even if the development in question were to attain a high green factor score. In limited circumstances, well designed and maintained, high quality greenspace can provide a more useable and biodiverse space which could offset a spatial loss. This should generally only be considered where the new greenspace would provide a net gain in biodiversity, accessibility and ecosystem service provision.

We are also concerned that the Urban Greening Factor only applies 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 advise that this policy is amended so that development on small sites also contributes to a *net gain in green cover wherever possible*.

Furthermore, whilst the scoring system in this Policy ranks semi-natural habitats highly, the value of a given green cover type is highly dependent on local context factors such as existing levels of ecosystem service provision, deficiencies in access to greenspace, and the distribution of priority habitats and species. Therefore the policy should provide greater detail about the factors Boroughs should consider as they develop their own greening factor models. In particular, the policy should state that the factors outlined in Sections B.2, B.3 and B.4 of Policy G6, relating to greenspace deficiency, habitat creation in an urban context, and priority species and habitats, should be integrated during the formulation of a Borough-level greening factor model. It may also be useful to suggest sources of evidence to be used to ensure that green cover options which cater to local biodiversity and greenspace priorities will be favoured above those which would be less appropriate or surplus to requirements in a local context, and how these considerations may be factored into an Urban Greening Factor calculation.

We would also like to highlight that creation of high quality, publically accessible greenspace should be provided in preference to inaccessible greenspace, and that this is reflected in the scoring regime set out in Table 8.2. Existing features of biodiversity interest should also be retained where possible in line with the mitigation hierarchy outlined in Policy G6.

**We recommend that:**

- The policy is reviewed to ensure that development also provide a net gain in green cover on site. One possible solution would be to incorporate additional supporting text is under 8.5.4 to

	<p>read: <i>'In addition to meeting the target score, development should also provide an overall net gain in the area green cover on site.'</i></p> <ul style="list-style-type: none"> <li>- Further guidance is provided in the supporting text under 8.5.4 to describe how local context factors will be taken into account through the provision of priority habitats within the calculation.</li> <li>- That the policy is reviewed to ensure that adequate consideration is given to the issue of accessibility in relation to newly provided greenspace</li> <li>-</li> </ul>
<p>G6 – Biodiversity and access to nature Page 311</p>	<p>We support the measures in this policy which relate to alleviating deficiency in access to nature, protecting SINCs and protecting and creating other new habitats. However, we consider that the Policy could be significantly strengthened in order to facilitate the achievement of the objectives set out in the London Environment Strategy.</p> <p>A number of organisations within London have adopted a biodiversity net gain approach, including the London Legacy Development Corporation and Transport for London and initiatives such as Greening the BIDs have demonstrated that a significant scope for additional greening in even high density urban environments (<a href="#">Natural England, 2013</a>), which could be used to support gains in biodiversity. A net gain approach would be consistent with Chapter 1 of the recently published 25 Year Environment Plan which states that the government will <i>'embed an 'environmental net gain' principle for development, including housing and infrastructure'</i>. For London to be declared the first National Park City, it is our opinion that gains in biodiversity should be an integral part of this.</p> <p>Natural England strongly advises that policy wording is included which ensures that all development within London (major and minor) should result in a net gain in biodiversity, as would be consistent with Paragraph 109 of the NPPF and the 25 Year Environment Plan.</p> <p><b>Key recommendation:</b> Policy G6 is a suitable location to draw together policy from the Spatial Development, Housing and GI &amp; Natural Environment chapters by establishing a net gain principle for all development. We recommend that point D of this Policy is amended to read <i>'All development should result in a net gain in biodiversity. To ensure that this is delivered, biodiversity enhancement should be considered from the start of the development process.'</i> We also recommend that this measure is cross-referenced in policies GG2, H1 and H2 to ensure that it is fully embedded within planning policy.</p>

We strongly support the protection afforded to SINCs, which are integral to maintaining functioning ecological networks within London, as well as facilitating continued public access to nature. In particular, we support the use of the mitigation hierarchy as described in Section C of this policy, in order to minimise harm to SINCs as far as is possible.

SSSIs, SACs, SPAs, and LNRs harbour some of London's greatest biodiversity, and whilst it is a legal requirement to avoid significant harm to such sites, planning policy should ensure that site protection is considered at the earliest possible stage in the planning process. Please see our recommendations below.

For many residents of London, gardens play a vital role in providing access to nature, as well as maintaining ecological and climate resilience. However gardens may be vulnerable to infill development on small sites. Please refer to our comments on Policy H2 for additional comments on this issue.

Natural England believes that green corridors and other proposals outlined in the All London Green Grid (ALGG) could help improve access to nature, if their potential contribution is fully considered as part of OAPFs and the 'growth corridor' framework described in Policy SD1 of the Plan. This would also contribute to fulfilling Proposal 5.1.1c of the London Environment Strategy. Please refer to our comments on Policy SD1 for further detail.

We also note that this Chapter of the Plan contains no specific measures for increasing community involvement in the improvement and management of London's greenspaces, as would otherwise contribute to fulfilling Proposal 5.1.1f of the London Plan.

**Recommendations:**

- Establish a biodiversity net gain approach for all development, as described above ('key recommendation')
- We strongly recommend that the policy makes provisions for potential impacts to SSSIs, SACs, SPAs and LNRs to be considered at the earliest possible stage of the planning process. In order to provide clarity to both developers and local policy-makers it should also be stated that development proposals should be refused where they will result in an adverse impact on European sites, either alone or in-combination with other plans or projects, or result in significant impacts to nationally designated sites. This would contribute to protecting a core



	<p>network of nature conservation sites as described in Policy 5.2.1 of the London Environment Strategy</p> <ul style="list-style-type: none"> <li>- An additional section of this policy under B to read '<i>6) consider how existing and newly created habitats can secure funding for appropriate management, and seek opportunities for community involvement in management activities</i>'</li> <li>- As per the Environment Agency's response, under paragraph 8.6.2, we recommend adding to the last sentence to emphasise the role of development plans and proposals in considering opportunities for restoring and creating linkages between sites of nature conservation importance, and thereby reducing habitat fragmentation.</li> </ul>
<p>G7 – Trees and woodlands</p> <p>Page 313</p>	<p>We support the measures included within this Policy to protect trees and woodlands, including veteran and ancient trees, and to ensure that any lost trees are adequately replaced, taking into account the benefit that the original trees provided.</p> <p>In order to promote the maintenance and expansion of London's urban forest as described in Proposal 5.1.1e of the draft London Environment Strategy, we believe it would be beneficial to seek both opportunities for natural regeneration of wooded habitats in suitable locations, and to support the management of London's existing woodland resource (as per Natural England's response to the London Environment Strategy). Therefore we <b>recommend</b> additional text be added to section B of this policy, in order to direct Development plans to provide suitable locations for natural regeneration of wooded habitat and to propose measures to manage the existing woodland resource effectively.</p> <p>Please also refer to the Forestry Commission response to this policy.</p> <p>As per the Environment Agency's response, we also <b>recommend</b> that an additional policy for '<b>River Protection and Restoration</b>' is included here. This would provide higher recognition of the importance of London's river habitats and wildlife than currently afforded by the waterways policies of Chapter 9. Please refer to the Environment Agency's response to this policy for further detail.</p>
<p>G8 – Food growing</p> <p>Page 315</p>	<p>Natural England supports the measures outlined in this policy.</p> <p>Temporary use of meanwhile spaces for food-growing may also have the capacity to contribute to ecological resilience and public health. Please refer to our comments on policy H4 for further detail.</p>

<p>G9 – Geodiversity</p> <p>Page 316</p>	<p>Natural England strongly supports the inclusion of policy to protect London’s geodiversity. However, we note that the policy is functionally similar to policy 7.20 of the current London Plan (2016), with the exception that Boroughs are no longer required to investigate additional sites that may be of value in the local area and afford them the appropriate level of protection in LDFs.</p> <p><b>We recommend that:</b></p> <ul style="list-style-type: none"> <li>- This policy makes provisions for Boroughs to investigate additional sites to be afforded the protection of LDFs.</li> <li>- This policy includes text to ensure that development proposals which may have a significant negative effect on SSSIs designated for geological interest be resisted.</li> </ul>
<p><b>Sustainable Infrastructure</b></p>	
<p>SI1 – Improving air quality</p> <p>Page 320</p>	<p>Air pollutants such as NOx can have significant impacts on the ecological integrity of natural and semi-natural ecosystems through a number of pathways including eutrophication. However, the benefits of reducing air pollution on biodiversity are often overlooked. Therefore we <b>recommend</b> that reduction in harm to biodiversity and improving ecological integrity are also listed as additional benefits of reducing air pollution within Paragraph 9.1.1.</p> <p>Certain types of green infrastructure have the capacity to mitigate air pollution, both by acting as direct physical barriers between sources and receptors of air pollution, and by actively removing pollutants from the air (e.g. street trees, hedges and green walls). We <b>recommend</b> additional text in paragraph 9.1.3 which supports the use of green infrastructure as a means of reducing and mitigating air pollution impacts.</p>
<p>SI 4 – Managing heat risk</p> <p>Page 334</p>	<p>Natural England supports the measure to in this policy to reduce the amount of heat entering a building through the use of green roofs and walls. We would like to suggest that, under B.2, the policy should also reference the use of street trees to reduce internal temperature through shading, and the use of other vegetated surfaces including natural and semi-natural vegetation types, where these replace hard surfaces such as concrete or tarmac, in reducing ambient external air temperature.</p> <p>Large areas of greenspace, especially those including tree cover have been shown to have a cooling effect beyond the greenspace itself (ref <a href="#">Green infrastructure and the Urban heat Island</a> – Forest Research; <a href="#">Natural England Research Report NERR057</a>)</p>

<p>SI 5 – Water infrastructure</p> <p>Page 336</p>	<p>Abstraction from rivers and groundwater aquifers already has detrimental impacts on our natural environment, including some of our most precious rivers and wetlands. Increased demand for water will exacerbate these impacts, or add new environmental pressures where new resources need to be developed to meet the demand.</p> <p>This policy highlights the need to improve water infrastructure so as to reduce the frequency of water usage restrictions during droughts. However, there is insufficient recognition of the fact that reducing water demand at all times (not just during drought) can reduce pressure on our rivers and wetlands and improve ecosystem health, thereby increasing the resilience of the natural environment to drought and climate change, and providing a higher quality natural environment for us all to enjoy.</p> <p>In order to fully recognise the positive impact that reducing demand for water can have on biodiversity we <b>recommend</b> the following measures:</p> <ul style="list-style-type: none"> <li>- Part D.1 relating to development plans and the Thames River Basin Management Plan should read '<i>promote the protection and improvement of the water environment, <b>including through measures to reduce demand for water, in line with the Thames River Basin Management Plan, and should take account of Catchment Plans</b></i>'</li> <li>- E.1 should read '<i>Development proposals should seek to improve the water environment, <b>taking into account the impact of climate change in exacerbating the impact of demand for water through abstraction and its impacts on biodiversity and the wider natural environment, and ensure...</b></i>'</li> </ul> <p>We support measure E.2 which seeks to reduce the number of misconnections between foul and surface water networks, which has a significant impact on freshwater ecosystem health within London.</p> <p>The formation of the Water Resource South East water expert group further highlights the need for biodiversity to be considered strategically on a similar scale (please refer to our comments on policies SD2 and SD3 for our full response on this matter). Water resource management has clear impacts on biodiversity and designated sites through changes in water quantity and quality, and as such the implications of water resource management decisions on biodiversity in the wider region should be fully considered.</p>

<p>SI 8 – Waste capacity and net waste self-sufficiency</p> <p>Page 347</p>	<p>In addition to the criteria listed under part D of this policy, development proposals for new waste sites should also be evaluated against their impact on biodiversity, and designated sites in particular. We therefore <b>recommend</b> an addition to part D of this policy in order to ensure that biodiversity is taken into account as part of proposals for new waste sites.</p>
<p>SI12 – Flood risk management</p> <p>Page 359</p>	<p>Natural England has a key role to play in landscape scale flood-risk management, and would be suitably placed to provide advice on integrating management with the objective of conserving and enhancing biodiversity. As such Natural England would be eager to collaborate with the named bodies in A on landscape scale flood-risk management issues.</p> <p><b>Recommendation:</b> The text in A is amended to read: <i>‘Current and expected flood risk from all sources across London should be managed in a sustainable and cost effective way in collaboration with the Environment Agency, <b>Natural England</b>, the Lead Local Flood Authorities, developers and infrastructure providers’.</i></p> <p>Flooding is a clear risk for residents living within flood zones, however where appropriate natural flood management techniques should be used to maintain and enhance the integrity of natural hydrological systems, recognising that in certain environments flooding is a natural process which maintains ecological integrity. Natural flood risk management methods can contribute significantly to improving flood resilience whilst also enhancing the coherence of the natural water cycle within London. Therefore we <b>recommend</b>, as per the Environment Agency’s response, that this policy includes a measure to encourage development proposals to integrate natural flood management features which create recreational areas and habitats.</p>
<p>SI13 – Sustainable drainage</p> <p>Page 361</p>	<p>Sustainable drainage systems can make a substantial contribution to enhancing biodiversity, improving the water quality and ecological integrity of watercourses and increasing green cover, , and would therefore complement green cover objectives as well as biodiversity policies in Chapter 8. Therefore, as per the Environment Agency’s response, <b>we recommend</b> that point D of this policy read <i>‘...address issues of water use efficiency, river water quality, <b>and enhances biodiversity, amenity and recreation.</b>’</i></p> <p>We support the measure in B for development to achieve greenfield run off rates, but <b>recommend</b> that the policy refers to best practice guidance such as the <a href="#">CIRIA SuDS Manual</a>. We also <b>recommend</b> that a measure is included to encourage Boroughs to work across administrative</p>

	<p>boundaries at the catchment scale, in order to devise strategies which support the provision of the right scale and type of sustainable drainage systems in the most appropriate locations.</p> <p>It is important for SuDS to be appropriately maintained so as to safeguard their function. Therefore we <b>recommend</b> that this policy incorporates the following text: <i>'Boroughs should seek to identify appropriate sources of funding for the maintenance of SuDS'</i>.</p>
<p>SI14 – Waterways – strategic role</p> <p>Page 363</p>	<p>Natural England welcomes the text of Paragraph 9.14.2, which describes the broad range of ecosystem services provided by rivers, and the diverse habitats which they often support.</p> <p>Please also refer to the Environment Agency's response to this policy.</p>
<p>SI16 – Waterways – use and enjoyment</p> <p>Page 371</p>	<p>Natural England supports the protection and enhancement of the Thames Path National Trail through planning policy, however we do not believe that the benefits of this recreational asset have been fully recognised. Please refer to our 'additional comments' under 'Transport' below for our full thoughts on this matter.</p>
<p>SI17 – Protecting London's waterways</p> <p>Page 373</p>	<p>London's waterways contain within them a significant amount of priority habitat, and are vital for ensuring the ecological integrity of a number of designated sites. Furthermore, the Thames recommended Marine Conservation Zone (rMCZ) is currently under consideration and may be designated in the near future. In addition to our comments on policy G7 recommending a new policy relating to river protection and restoration, we consider that this policy should provide greater clarity regarding the value, protection and enhancement of London's waterways.</p> <p>Whilst we support measures to refuse development proposals to impound or constrain waterways, we consider that this policy should emphasize the role for Boroughs in providing a strong policy direction to protect and enhance the biodiversity value of waterways within their development plans. Therefore we <b>recommend</b> that this policy incorporates the following text: <i>'Boroughs should plan positively for the protection and enhancement of biodiversity associated with waterways, working across administrative boundaries at the catchment scale as far as possible. Boroughs should identify parts of the river network where river restoration, including biodiversity improvements, will be sought'</i>.</p> <p>As per the Environment Agency's response, we also <b>recommend</b> that this policy is strengthened to support opportunities to:</p> <ul style="list-style-type: none"> <li>• Improve water quality, thus meeting Thames River Basin Management objectives,</li> <li>• De-culvert rivers, and restore them to a more natural state.</li> </ul>

<b>Transport</b>	
T2 – Healthy Streets Page 403	<p>We welcome the text to support the use of greening within new development in paragraph 10.2.4, however we believe that given the substantial physical and mental well-being benefits of access to nature and greenspace, the definition of the Healthy Streets approach should more fully encapsulate the use of greening and biodiversity.</p> <p>Appropriate creation of greenspace may increase the attractiveness of travel routes and further encourage travel by foot or bicycle. Any reductions in on-street parking provision as a result of the drive to shift away from reliance on cars may free-up street space, which could be used for additional greenspace such as wildflower verges, pocket parks or rain gardens.</p> <p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>- 1) We recommend that ‘Greenspace’ is included as a Healthy Street Indicator in order to fully recognise the benefits of greenspace in ensuring that streets have a positive effect on the health and well-being of residents.</li> <li>- 2) An addition to paragraph 10.2.4 to read ‘<i>Measures which improve Londoners’ experience of individual streets, including greening, to encourage them to live active lives should be embedded within new development, <b>taking advantage of any opportunities to green any redundant road space</b></i>’.</li> </ul>
T3 – Transport capacity, connectivity and safeguarding Page 406	<p>We support the measure in part B for Development Plans to safeguard, protect and enhance the Walk London Network. However, please refer to our ‘additional comments’ below for our detailed thoughts on this matter.</p> <p>Please also refer to our response to Policy G6 which recommends the inclusion of policy to ensure that all development result in a net gain in biodiversity. We <b>recommend</b> that text is included within this policy to ensure that transport infrastructure projects, including the projects listed in this policy.</p>
T5 – Cycling Page 414	<p>The planning use class system used as a basis for section F and Table 10.2 of this policy does not include greenspace and parks. In light of the high density development proposed in the plan, existing and new greenspace should be designed to support high levels of accessibility (whilst also minimising impacts to biodiversity). Therefore, we <b>recommend</b> that Table 10.2 is amended to include</p>

	<p>a section for parks to ensure that these areas are fully used as recreational destinations and can be easily accessed.</p>
<p>Additional comments</p>	<p>Natural England welcomes and supports the measures for the protection and enhancement of the Thames Path outlined in Policies T3 and SI16, but believe that its importance as a National Trail and the value it provides to residents and visitors has not been fully recognised. <a href="#">The ORVal Tool</a>, a model used to estimate the value of greenspace and walking routes, indicates that the Thames Path National Trail has a recreational value significantly greater than £20m, placing it well beyond the threshold for assets deemed to be of ‘very high’ importance, the highest category in the model. In addition, Natural England is currently working to extend the Thames Path National Trail to link to the English Coast Path, which when completed will be the longest continuous coastal path in the world (2700 miles). This underscores the value of the Thames Path National Trail as a vital recreational asset for the Capital.</p> <p>Outer London Boroughs have a statutory duty to publish Rights of Way Improvement Plans that should highlight local needs and opportunities to improve existing paths and more formally promoted walking routes. These plans can help to integrate access to greenspace within the Outer London Boroughs providing links to strategic routes such as the Green Chain and the Capital Ring. As such their importance and statutory nature should be highlighted. .</p> <p><b>Recommendation:</b></p> <p>Therefore it is our opinion that an additional policy should be included within the Transport section of the Plan in order to i). Recognise the importance of and substantial benefits provided by strategic walking routes, particularly the Thames Path National Trail and ii). Make provisions for the protection and enhancement of strategic walking routes within the capital including the Thames Path National Trail, Green Chain and Capital Ring.</p> <p>Furthermore, it has been noted that crossing the River Darent via the Thames path currently requires a 9km diversion upstream, which greatly hinders the function of this section of the Path. Proposals have been made for a bridge to connect the Path on either side of the river, however this has not received attention in some time. We believe that for the function and use of the Thames Path National Trail to continue to be improved, it is important for this issue to be addressed. Natural England would be happy to engage on this issue further with the GLA.</p>

<b>Funding the London Plan</b>	
Overview Page 440	We concur with the acknowledgement in paragraph 11.0.3 that there is a significant need to invest in green infrastructure. We would also like to highlight that where necessary to facilitate the flow of ecosystem service benefits from existing and new green infrastructure, funding for the long-term management of green infrastructure should be sought, and this should be emphasized within this chapter of the plan.
Enabling infrastructure Page 448	<p>We welcome Paragraphs 11.1.45 – 11.1.51 relating to securing funding to manage and upgrade green infrastructure, and acknowledge the work which has already been undertaken by the Mayor and others in relation to quantifying ecosystem service benefits published in the Natural Capital Account. However, we note that this section does not include any specific measures to ensure that the economic benefits described in the Account are effectively integrated with planning decisions. In the absence of this integration, it is unlikely that the economic benefit of green infrastructure will be fully considered, and may therefore lead to continued degradation. We therefore <b>recommend</b> the addition of a measure to encourage Boroughs to refer to the Natural Capital Account in their development plans and SPDs for strategic infrastructure provision.</p> <p>Furthermore, many types of green infrastructure require funding for management in perpetuity in order to safeguard their function and benefit. We would welcome a commitment from the Mayor to explore potential funding models, including through land value capture, to secure greater funding for newly provided green infrastructure through development in perpetuity.</p>
<b>Monitoring</b>	
Key Performance Indicators and Measures Page 458	We note that in relation to the current London Plan (2016) the Draft New London Plan contains a reduced number of Key Performance Indicators (KPIs). In particular, the measure for no net loss of designated Sites of Importance for Nature Conservation (SINCs) will no longer be monitored as a KPI. 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 SINC space will be under greater pressure for development. Whilst Policy G6 contains protective measures for SINCs, in the absence of this 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



	<p>necessary. We therefore <b>recommend</b> that the plan be assessed against the objective of no net loss of SINCs, and that this is included as a KPI within this section.</p> <p>Furthermore, we note the removal of the measures relating to the restoration of streams and rivers (KPI 23 in the current London Plan). We <b>recommend</b> that this is brought forward into the new Plan.</p>
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## **Appendix 1 – Natural England’s response to Habitats Regulations Assessment (HRA)**

As a high-level spatial Plan, the London Plan sets Borough-level housing targets but does not allocate specific sites. It is therefore appropriate for the HRA to assess only the scope for impacts which may arise directly or indirectly as a result of those broad housing targets which could not otherwise be adequately mitigated for through local spatial development and development management policy. As such, Natural England is in general agreement with the conclusions of the HRA, however we have a few specific concerns which we would like to see addressed.

In relation to the air pollution impact pathway, the draft HRA refers a number of times to mitigation measures in the as yet not adopted Mayor’s Transport Strategy (MTS). Currently the MTS constitutes only a list of potential options for reducing and mitigating air pollution, and there is therefore no certainty that these measures will be implemented. The precautionary principle embedded within the Habitats Regulations (2010) as amended requires that greater certainty is provided that adverse effects will be avoided. As such, we consider that greater clarity is needed regarding the availability of options to mitigate and reduce air pollution outlined in the MTS in relation to the timing of housing brought forward within the plan, which if unavailable at this time may have the capacity to lead to air pollution impacts. This detail should be included in a revised version of the HRA.

We strongly support the recommendations laid out in Sections 7.5.1 and 7.6.1 of the HRA which make provisions for i). The Plan to be revised to direct the London Boroughs of Waltham Forest, Redbridge (and also possibly Newham and Enfield) to participate as appropriate in the mitigation strategy for Epping Forest SAC, and ii). to acknowledge that monitoring of progress with the delivery of these housing targets in tandem with the success of the solution to improve air quality and recreational activity in the SAC may trigger a need to revise the targets in the future, although there is no specific reason to believe that the strategy would not be able to address the impacts of anticipated development.

In relation to Lee Valley SPA, we note that the plan states in Section 8.5 that ‘*Recreational disturbance is therefore not considered an issue for growth in London since Walthamstow Reservoirs are currently considered an underused recreational resource and is thus has been opened up to the public as part of the carefully planned Walthamstow Wetlands project*’. However, contrary to this assertion, we do not consider that the opening of Walthamstow Wetlands to the public prohibits the possibility of current and future recreational disturbance impacts under the policies in the Plan. Given the increased accessibility of the site, recreation is now being monitored, and the outcome of this survey may inform future mitigation. Therefore **we recommend** that this text is re-drafted to acknowledge that recreational disturbance may have the capacity to

result in a likely significant effect on the SPA in the absence of appropriate mitigation. Sources of appropriate mitigation should also be identified in Section 8.5.

## **Appendix 2 – Natural England’s comments on the Integrated Impact Assessment (IIA)**

Natural England supports the inclusion of Objective 20, which is *‘to protect, connect and enhance London’s natural capital (including important habitats, species and landscapes) and the services and benefits it provides’*. However, we note that a number of policies which would clearly affect the viability of this objective have been marked as ‘n/a’. In particular, the effects of policies SD1 and H1 have been marked as ‘n/a’ in this respect. We suggest that the assessment is reviewed with regards to our comments on these policies above.