



Comments submitted by eCountability Ltd on the draft London Plan – consultation deadline 2 March 2018

eCountability Ltd is a business active in environmental research and policy delivery in the Greater London area.

Registered address: Chancery Cottage, Kentisbeare, Cullompton, Devon, EX15 2DS.

The company is willing to participate in the Examination in Public.

Comments submitted by Mr Bill Butcher, Director.

Please correspond by email: bill.butcher@ecountability.co.uk

Policy GC3 Creating a Healthy City

We **support** this policy. We have developed, in partnership with several research organisations, a considerable evidence base that underlies the importance to health of policy GC3 E on improving access to green spaces and the provision of new green infrastructure.

Policy D1 London's form and characteristics

We **support this policy**. We regard the following sections of the policy as being of particular importance, in that they deliver part of the commitment in the government's 25 Year Environment Plan to ensure high environmental standards for new builds:

D1 A7 Conveniently located green and open spaces

D1 A8 Active travel

D1 A9 Noise and poor air quality mitigation

D1 B1 Local context

D1 B3 Sustainability standards

D1 B5 Urban greening opportunities

These policies can be described collectively as supporting the delivery of ecosystem services, including cultural services (e.g. outdoor recreation, amenity, access to nature) and regulating services (e.g. mitigation of poor air quality, noise, flood risk from surface water). All of these services, which flow from green infrastructure in the city context, are essential to people's wellbeing. Many of them will be under extreme pressure in the lifetime of the London Plan through the effects of climate change.

Policy GC2 Delivering good design

We support this policy. Its full implementation through Development Plans is essential to deliver Policy D1.

Policy D8 Tall buildings

We support this policy, but recommend an additional clause 3 d, for the views of greenspace from the tall building, and the net effects of the building in obstructing views of greenspace as seen by

residents, workers and hospital patients in nearby buildings be taken into account in consideration of environmental impact.

There is strong evidence that views of greenspace from inside buildings make a significant contribution to mental health, illness recovery speed and employment productivity. A policy is therefore needed to ensure that the net effect of building construction is positive for this important parameter on people's wellbeing.

Policy G1 Green Infrastructure

We **support** this policy, but believe it is insufficient to deliver the aim of the green infrastructure approach to deliver the multiple objectives as set out in supporting text 8.1.1. Furthermore, the current draft policy does not align with the objective of environmental net gain as set out in the government's 25-year Environment Plan.

The natural capital accounts developed for London's Public Parks give the collective picture for a part of the greenspace resource. They need to be developed into a strategic assessment of ecosystem service benefits to London people delivered by London's network of parks and green spaces. This would identify areas of deficiency in the supply of services, in relation to local demand, and enable the identification of priorities for greenspace protection and management, and the creation of new greenspace. This strategic framework would then guide further development of the All London Green Grid, and the roll out of evidence-based, joined up Area Frameworks.

We recommend an additional clause G1 D that would require major and minor housing and infrastructure developments to **demonstrate net gain** in the delivery of ecosystem services from green infrastructure affected by the development. This requirement would give significant drive towards the Plan's overarching aim of achieving Good Growth.

Policy G6 Biodiversity and access to nature

We believe that this policy should be **strengthened** to ensure full compliance with the National Planning Policy Framework and to implement the government's 25-year Environment Plan, published in January 2018.

In particular:

Policy B 4) should be extended to include commitments to ensuring no net loss, or net gain where appropriate, of priority habitats and species.

A new policy B 6 should be added to require developers, in respect of major housing and infrastructure developments and other developments in areas near protected sites, priority habitats or priority species, to access the best available evidence base on biodiversity, to allow an informed decision to be made on whether to grant planning permission.

Work commissioned by the GLA in 2016 found that up to 18% of planning applications in Greater London could have an adverse effect on biodiversity, while only 1% made use of a data search from the capital's environmental records centre, Greenspace Information for Greater London. A recommendation of this report was that planning authorities should publish online maps of areas close to protected sites, priority habitats and priority species, within which access to biodiversity evidence would need to be demonstrated by the applicant for minor housing and infrastructure developments.

It is important that this policy is extended to these selected “Minor” (in the sense of planning application type coding) applications, as the cumulative effect of these applications may far exceed the impacts of “Major” developments. For example, in the London Boroughs of Ealing, Southwark and Camden, the number of “Minor” housing applications exceeded “Major” applications in 2014 by a ratio of around 25 to 1, while the area covered by these respective application types in the Borough of Ealing was around 19 to 1.

The current draft policy, which is essentially a continuation of the current London Plan biodiversity policy, has not proved adequate to protect and conserve biodiversity, does not align with the National Planning Policy Framework or the government’s 25-year Environment Plan. The recommendations outlined here will align with these national frameworks and plans and be significantly more likely to deliver the Mayor’s commitment to environmental protection than the current draft wording. This is especially important within the context of Policy GG4, which requires that more homes are delivered; this policy will accelerate the rate of housing construction and increase the risks of environmentally damaging development in the absence of a more targeted and spatially resolved biodiversity policy.

Policy S11 Improving air quality

We **support** this policy, as it is completely unacceptable for poor air quality to cause thousands of premature deaths in London each year, and good planning is an important part of the solution.

We recommend that the wording of clause A3 is strengthened, so that Developments are required to demonstrate net positive impact on air quality, not merely to propose methods. The role of the creation of new greenspace and improvements to quality of existing greenspace from the air quality perspective should be mentioned.

Ends