

**A City for All Londoners  
Consultation  
December 2016**

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## **SUMMARY**

The RSPB's aspiration is for a greener, cleaner and wildlife-rich city which mitigates and adapts to climate change and provides a healthier environment for all Londoners.

We warmly welcome the aspirations and the leadership shown in the Mayor's City for All Londoners document and very much look forward to working with the Mayor as the London Plan and Environment Strategies are further developed. We are keen to offer our expertise and support where we can.

We have provided key recommendations below. Further points are highlighted in our main response.

**Water:** Include water as a topic within future Drafts of the London Plan and supporting strategies. Design new homes to the highest standards of water efficiency and embark on a programme of retrofitting. Actively promote uptake of Sustainable Urban Drainage systems within London.

**Green Spaces:** Ensure that intensification of development does not result in loss or damage to designated green spaces or wider semi-natural and natural habitats of nature conservation value. Commit to an overall enhancement of London's biodiversity. The review of the London Plan and supporting Strategies offers a key opportunity to plan for biodiversity at a landscape-scale.

**Brownfield land:** Brownfield land of high environmental value should be protected from development. Provide guidance on when a brownfield site should be considered of high environmental value. Ensure all brownfield sites being considered for development are supported by an up to date ecological survey and assessment.

**Zero carbon:** We strongly support the overall ambition to ensure London is zero carbon by 2050 and for net-zero energy retrofitting. The Mayor must publish his detailed road map for reducing carbon immediately to achieve this ambition. This must be delivered in harmony with nature.

**Energy:** The Mayor should substantially increase the uptake of energy efficiency and rapidly roll-out renewable technologies such as rooftop solar. Deliver biodiverse green roofs alongside rooftop solar schemes.

**Climate Change Adaptation:** It is critical London adapts to the climate change effects it is already facing. The Mayor should take immediate adaptation action to help build a resilient city now and into the future.

**Housing:** New homes should be designed to mitigate and adapt to climate change and create new networks of biodiversity and green infrastructure. Build houses to the highest sustainability standards. Biodiversity protection and enhancement and connection to nature must be an integral part of future housing policy. Retrofit biodiversity enhancements into existing housing developments – a holistic, coordinated approach to retrofitting buildings (e.g. in respect of energy efficiency, biodiversity, SuDs etc) would be most beneficial.

**Transport:** Prioritise developments in locations that reduce the need to travel first to eliminate emissions from the transport sector. Prioritise modal shift, electrification and other technologies over the use of biofuels for road transport.

**Health:** Incorporate, nature and green spaces within new and existing communities in London to support improved health and wellbeing.

## INTRODUCTION

1. The Royal Society for the Protection of Birds (the RSPB) is the charity that takes action for wild birds and the environment. We are the largest wildlife conservation organisation in the country with over one million members. We own or manage 151,954 hectares of land for nature conservation on 213 reserves throughout the UK. Our 350 hectare Rainham Marshes nature reserve is located on the boundary of London and Thurrock.
2. We believe that sustainability should be at the heart of decision-making. The RSPB's policy and advocacy work covers a wide range of issues including planning policy, climate change, energy and water. As well as commenting on national planning policy issues, the RSPB's professional conservation and planning specialists engage with over 1,000 cases each year throughout the UK, including development plans and individual planning applications and proposals. We thus have considerable planning experience. The RSPB also makes over 100 planning applications a year on its own reserves and estate.
3. We believe we have a moral imperative to save nature – nature is important in its own right as well as being crucial to people's quality of life and providing important life-support systems.
4. The State of Nature Report 2016 (launched on 14<sup>th</sup> September 2016) gives us the clearest picture to date of both the long-term and recent trends in our native species – over half (56%) of UK species have decreased since 1970. The UK has lost significantly more nature over the long term than the global average. All four countries of the UK rank in the bottom quarter of countries assessed in the Biodiversity Intactness Index. Urbanisation (including loss of green space such as parks, allotments and gardens and loss of wildlife-rich brownfield sites) is one of the key drivers for change in our nature – the report states that 7% of urban species are threatened with extinction from Great Britain. This highlights the need to ensure that all opportunities to protect and enhance biodiversity are supported.
5. We are supportive of a number of the aims and ambitions set out in the document recognising that the detailed delivery and implementation mechanisms will be key.
6. This submission provides our response to *A City for all Londoners* document (henceforth known as the document). Our submission is structured in accordance with the chapter

headings and subheadings in the document. We have also provided some overarching, general comments below.

7. We very much look forward to working further with the Mayor and partners as the Draft London Plan and supporting Strategies are drafted.

## **GENERAL COMMENTS**

### **CONSIDER THE WIDER ENVIRONMENTAL IMPACTS FROM LONDON AND ITS CITIZENS**

8. The Mayor should not only consider reducing emissions within the boundaries of Greater London, but to also take into account the wider impacts that the activities of Londoners have on the UK and global environment, particularly with respect to significant resource demands driving environmental degradation such as water scarcity and biodiversity decline in the agricultural landscape.

## **WATER**

### **WATER SUPPLY**

9. Water is not directly dealt with in the document. Given the importance of water supply and wastewater treatment to people and the environment we strongly recommend that water be incorporated in future Drafts of the London Plan and supporting strategies.
10. London takes its water from a water stressed region and this will get worse with climate change. The Thames catchment is classed as 'water stressed' meaning that sometimes there is not enough water to meet human and environmental needs and this will increase in future (both the likelihood and size of deficits are predicted to increase significantly by 2040)<sup>1</sup>. The "Water supply and resilience and infrastructure" Environment Agency advice to Defra report produced in October 2015 referred to an estimate for the monthly cost of non essential use restrictions for London alone at £7 – 10 billion.
11. At the same time London is also performing very poorly on leakage, water consumption per head and metering. For example, Londoners use an average of 157 litres water a day (above the national average of 149 litres) <http://www.ccwater.org.uk/savewaterandmoney/averagewateruse/>.
12. The barrier to delivery of improvements has been a lack of focus and investment, particularly on demand management by Thames Water. We strongly recommend that the Mayor influences Thames Water to prioritise demand management (to make London more resilient) and also works more closely with Thames Water and London Boroughs on some of the behavioural aspects around water consumption. All new homes should be designed to the highest standards of water efficiency and a programme of retrofitting put in place.
13. The Mayor could show leadership by looking at water efficiency and reuse in buildings the Mayor is responsible for.

### **WASTEWATER TREATMENT AND SURFACE WATER DRAINAGE**

14. Whilst the Thames Tideway Scheme will effectively deal with the worst of the main sewers discharging into the Thames, it doesn't deal with the capacity of the subsidiary network or the

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<sup>1</sup> Water Resources Long-term Planning Framework' <http://www.water.org.uk/water-resources-long-term-planning-framework>

risk of surface flooding from blocked drains. Sustainable Drainage Systems (SuDs) have to be part of the solution.

15. The Mayor should consider the opportunity to use SuDs to deliver other benefits and push for Boroughs to deliver multi-functional SuDs schemes, such as:
  - Access to nature for the city's residents, which has proven mental and physical health benefits.
  - Homes for wildlife and opportunities for biodiversity enhancement.
  - Sustainable drainage and rainwater harvesting.
  - Reducing air and noise pollution.
  - Opportunities for recreation and improved health.
  - Reducing the urban heat island effect.
  - Increasing the understanding of the value of water amongst Londoners.
16. Currently, the Greater London Authority has a tool that allows them to target the best places in London for SuDs. While some London Boroughs are already using the tool, it should be actively promoted to the remaining Boroughs.
17. Opportunities to retrofit SuDs should also be sought using soft and hard landscaping.

## PART 1: ACCOMMODATING GROWTH

18. The document sets out the Mayor's proposed strategy to accommodating growth.

### PROTECTING THE GREEN BELT AND OTHER DESIGNATED GREEN SPACES

19. The RSPB does not generally comment on Green Belt policy. We do, however, support **more positive use of London's Green Belt in respect of biodiversity protection and enhancement and access to nature** in line with the aims of the NPPF.
20. We are keen to ensure that intensification of development does not result in loss or damage to the most important sites for wildlife and are pleased that designated green spaces will be protected. We strongly recommend that protection is extended to wider semi-natural and natural habitats of nature conservation value which are not conferred protection. Furthermore, there should be a commitment to overall enhancement of London's biodiversity.

### INTENSIFICATION OF DEVELOPMENT

21. The RSPB accepts that there is a significant need for new housing in the UK. However, we believe that the quality and location of this housing is just as important as the quantity. In particular, we believe that new housing developments should be delivered in harmony with nature. Urban areas take up just 7% of the UK's land but are home to 80% of the UK's population. Finding space for nature to co-exist is a big but achievable challenge. It is estimated that 47% of Greater London is green<sup>2</sup>. 33% is vegetated green space according to surveyed habitat information<sup>3</sup>, excluding an additional 14% which is estimated to be vegetated private, domestic garden green space<sup>4</sup>. It is important that these existing green spaces are retained and improved as well as creating new habitats for wildlife. The natural environment and green infrastructure must be taken into account at all stages of the

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<sup>2</sup> Greenspace Information for Greater London, 2015

<sup>3</sup> Figure calculated from GiGL habitat dataset (December 2013).

<sup>4</sup> Figure taken from 'London: Garden City?' report (Greenspace Information for Greater London, London Wildlife Trust and Greater London Authority, 2010)

development process from the strategic identification of locations for development through to development master planning. This is crucial so existing sites of nature conservation value / green infrastructure are protected and opportunities are sought for enhancement alongside new development.

22. The National Planning Policy Framework (NPPF) includes a number of strong policies and principles for conserving and enhancing the natural environment. This includes an expectation that the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity. **Opportunities to incorporate biodiversity in and around developments should be encouraged.**
23. Furthermore, Section 40 of the Natural Environment and Rural Communities Act, 2006 places a duty on all public authorities in England to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. Thus, there is a statutory basis for planning to seek to minimise impacts on biodiversity and provide net gains where possible. In addition, biodiversity maintenance and enhancements through the planning system have the potential to make a significant contribution to the achievement of Biodiversity 2020 targets.
24. We are committed to ensuring that well-located new housing developments deliver biodiversity enhancements. This ensures space for nature is protected and enhanced (protecting nature for its own sake) whilst providing opportunities for people to engage with nature which can in turn improve individual health and wellbeing. In the urban context, we are particularly interested in enhancements for our priority bird species including swifts, as well as our All Nature priority species stag beetle and shrill carder bee.
25. Recognising the extent of intensification of development which will be necessary in London, it will be important that scope is given to retrofitting biodiversity enhancements into existing developments. Biodiversity enhancements can be delivered through a variety of design measures such as SuDs and green roofs, however, it is important that designers have access to ecological expertise to ensure that positive outcomes are achieved for biodiversity. We also recommend that in developing green roofs consideration is given to delivery of complementary uses such as solar panels.
26. We understand that the Mayor is investigating the use of offsetting or Green Space Factor schemes potentially as a means for new developments to incorporate urban greening. We provided evidence on offsetting in our response to the London Assembly Housing Committee's investigation into Encouraging Biodiversity Enhancement into New Housing Developments and would be keen to discuss future approaches further.
27. The use of biodiversity offsets has the potential to contribute to positive biodiversity outcomes under specific conditions. However, if used inappropriately it could also make things considerably worse. That offsetting biodiversity loss is risky is evidenced by the fact that there are no systems in the world that have been able to demonstrate no net loss of biodiversity, and a wealth of studies showing (often considerable) net losses. The results of Defra's biodiversity offsetting pilot projects highlight the considerable evidence gaps that still remain, particularly with regard to offset delivery and management.
28. Biodiversity offsetting should only ever be used for projects that have rigorously applied the mitigation hierarchy and must always be a measure of last resort (i.e. after all efforts to avoid or mitigate harm through appropriate location and design have been exhausted). Re-creating or restoring complex natural processes is inherently difficult and full of risk. As such, in-situ conservation is always preferable.
29. Biodiversity offsetting is not appropriate in all circumstances, in particular where the risk of offset failure is high and/or where offsetting is infeasible such as in the case of threatened species or in effect 'irreplaceable' habitats such as ancient woodland and limestone pavements. Part of the development of any offsetting system must include a systematic,

evidence-led assessment of the feasibility of restoring or creating habitats successfully, including for the species/species communities dependent on them.

30. A significant improvement in the current level of ecological capacity/expertise within local planning authorities should be viewed as a pre-requisite to implementing a successful system of biodiversity offsetting. In the absence of sufficient ecological capacity and expertise, there is a serious risk that the mitigation hierarchy will be undermined resulting in worse biodiversity outcomes. In addition, without ecological expertise, local planning authorities will also struggle to maximise any potential benefits from the strategic location of offsets in line with conservation priorities.
31. Our view, informed by the results of Defra's biodiversity offsetting pilot programme is that any offsetting system should be mandatory for all developments and should sit within a clear and consistent national framework that sets minimum values for nationally important habitats and species. A key question-mark over the application of such a system in London is whether there is sufficient space to deliver compensation close to the point of impact.

## **PROVIDING NEW RIVER CROSSINGS AND INFRASTRUCTURE**

32. In providing new river crossings and supporting infrastructure, the Mayor should look for opportunities to incorporate green infrastructure and biodiversity enhancements. We draw the Mayor's attention to the Swift Flowing Thames project which is a multi-partner project with the objective of creating opportunities for swifts and sand martins along the river corridor.
33. The importance for biodiversity of the river itself should be recognised and taken account of in any such developments.

## **CONVERTING SURPLUS INDUSTRIAL LAND FOR HOUSING / ACCELERATE DEVELOPMENT IN OVER 40 OPPORTUNITY AREAS AND IN OTHER INTENSIFICATION AREAS**

### **BROWNFIELD LAND OF HIGH ENVIRONMENTAL VALUE**

34. We understand that the Mayor wishes to make use of surplus industrial land and maximise development on brownfield Opportunity Areas. Paragraph 111. of the NPPF is clear that planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land) **provided it is not of high environmental value**. The RSPB recognises that redeveloping brownfield land can provide opportunities for sustainable development, reduce pressure on the Green Belt and other undeveloped land, and offer chances to promote economic regeneration (of particular significance in London). However, some brownfield sites are havens for wildlife and support some of the UK's most scarce and threatened species. In many cases they provide the last 'wild space' in urban areas for local communities, allowing them access to nature and consequently improving the communities health and wellbeing. It is clearly important that brownfield land of high environmental value (in biodiversity terms) is properly defined and understood. This will help ensure that paragraphs 17 and 111 of the NPPF are interpreted correctly.
35. Further London guidance could be provided to ensure that planning practitioners fully understand how to determine if a brownfield site is of high environmental value (in biodiversity terms). As a minimum this could incorporate the definition provided by Wildlife and Countryside Link<sup>5</sup> - i.e. a site is of high environmental value (in biodiversity terms) if:

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<sup>5</sup> <http://www.wcl.org.uk/docs/Brownfield%20high%20environmental%20value%20FINAL%20June%2015.pdf>

- *It contains priority habitat(s) listed under section 41 of the Natural Environment and Rural Communities Act 2006*
- *The site holds a nature conservation designation such as Site of Special Scientific Interest, or is selected as a local wildlife site.*

36. The RSPB also requests that all brownfield sites being considered for development be supported by an up to date ecological survey and assessment undertaken by a recognised expert (for example, a Chartered Member of the Institute of Ecology and Environmental Management). Any revisions to policy could include specific reference to brownfield land recognising the prominence given to this for redevelopment and to ensure that the best brownfield sites are protected for wildlife.

## **OPPORTUNITIES OFFERED BY LARGE-SCALE DEVELOPMENT**

37. Well-planned, well-designed new large-scale housing in the right location also offer an opportunity to reduce greenhouse gas emissions in the longer term, minimise vulnerability to and provide resilience to the impacts of climate change as well as supporting the delivery of renewable and low carbon energy. Section 10 of the NPPF (Meeting the challenge of climate change, flooding and coastal change) already provides a strong policy steer in this regard.
38. Furthermore, new large-scale housing developments should support the creation, enhancement and management of new networks of biodiversity and green infrastructure, delivering a net benefit in biodiversity and comply with the full suite of environmental policies set out in the NPPF. **The review of the London Plan and supporting strategies offers a key opportunity to plan for biodiversity at a landscape scale.**
39. The RSPB is currently in partnership with Barratt Developments to find ways of designing and landscaping its new housing developments and green spaces in a nature friendly way. This will involve building features such as nest bricks for swifts into plans for new homes, and wildlife-rich green spaces. Further information will be provided as the partnership develops which could be used to inform good practice on planning for new large-scale developments and we would be happy to share further details with the Mayor.

## **BUILDING NEW ZERO-EMISSION, RESILIENT DEVELOPMENTS / ENCOURAGING THE USE OF MORE EFFICIENT, LOW-EMISSIONS VEHICLES AND OVERALL LESS CAR AND VAN USE**

40. We support building new zero emissions, resilient developments and expect all new developments to meet these standards alongside the highest standards of sustainability in respect of other areas such as water efficiency. However, the Mayor should consider the opportunities for new developments to be negative carbon, not just zero carbon, to help make up for the fact that there are many heritage buildings in London, which will never achieve zero carbon. We provide further comments under Part 4 of this response - Environment, Transport and Public Space.
41. We agree with the support given to the use of more efficient, low-emissions vehicles and overall less car and van use. We provide further comments under Part 4 of this response.

## **OTHER COMMENTS**

42. We are pleased the Mayor recognises the need for the city to remain green and healthy as it grows. We request that protection and enhancement of wildlife is also recognised as a requirement of a green and healthy city.

## **PART 2 HOUSING**

43. The Housing Chapter does not reference protection and enhancement of biodiversity which should be seen as a key contributor to quality of life. We expect biodiversity protection and enhancement (including connection to nature) to be an integral part of future housing policy and a key consideration when planning for new homes.
44. The comments we provide in respect of housing under Part 1 above are also relevant here. We also make the following points:

## **DEVELOPMENT OF SURPLUS PUBLIC LAND FOR HOUSING**

45. We recognise that the Mayor wishes to make best use of surplus public land for housing. However, we wish to ensure that our national network of protected areas (such as SSSIs), where they are in public ownership, will continue to be protected from any future public land disposal. This reflects the very strong presumption against developing SSSIs in primary legislation and the National Planning Policy Framework.
46. We also wish to ensure that other environmental designations that are or will be underpinned by SSSIs will continue to be protected from development. In the context of nature conservation, we define 'other environmental designations' as all legally designated sites including SPAs, SACs, Ramsar sites, National Nature Reserves (including potential or candidate sites); or sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation and listed or proposed Ramsar sites.
47. The Mayor should exclude SSSIs and other environmental designations from the disposal of future public land. This will ensure the public and others can continue to enjoy these special places but will also avoid the need for costly, protracted planning and legal cases where authorities seek to dispose of public land of high environmental value – which is likely to meet with significant public opposition.
48. Furthermore, we would urge the Mayor to provide scope for the public (including NGOs such as the RSPB) to engage with any proposals for land disposal, particularly where land proposed for disposal has existing or potential nature conservation value. It is vital that the public continues to have a voice on land use decisions, particularly where 'wild spaces' provide access to nature and support community health and wellbeing.

## **OTHER COMMENTS**

- When planning for new housing developments, housing and landscape designers should have access to independent ecological expertise to ensure that positive outcomes are achieved for biodiversity.
- The future management and maintenance of new housing developments may act as a barrier to delivery of biodiversity enhancements (particularly where different developer partners take on the development of different phases). Helping developers to understand the longer term cost savings of inclusion of biodiversity enhancements would help break down this barrier.



- Scope for retrofitting biodiversity enhancements into existing developments must form part of future biodiversity policy. A holistic, coordinated approach to retrofitting buildings (e.g. in respect of energy efficiency, biodiversity, SuDs etc) would be most beneficial.
- Developing a more comprehensive (and mandatory) strategy for protecting and enhancing biodiversity near housing developments is likely to have many complementary social benefits including improved health and wellbeing and reduced health inequalities.
- Local planning authorities must be properly resourced in order to properly consider biodiversity through the planning system and must have access to independent ecological expertise. See work undertaken by the Association of Local Government Ecologists<sup>6</sup> for further information on the impact of resourcing.

49. An example of the approach we are taking to deliver nature-friendly housing is our partnership with Barratt Developments PLC. We joined forces with Barratt developments to set a new benchmark for nature-friendly housing developments. This was the first national agreement of its kind in the UK. The partnership's flagship scheme for 2,450 homes at Kingsbrook, Aylesbury will include a major new urban fringe nature reserve as well as nature-friendly elements in the built environment. A range of biodiversity enhancements are expected to be delivered at Kingsbrook including: SuDs (swales and detention ponds); hedgehog highways in fences, flower-rich grasslands in public open spaces, native tree planting including the rare black poplar, fruit trees in gardens and swift bricks. Kingsbrook was recently the 2016 winner of the prestigious Big Biodiversity Award – large-scale permanent category.

## **PART 3 ECONOMY**

### **STRATEGIC INVESTMENT PROGRAMME**

50. We support a Strategic Investment Programme for the Capital which will incorporate water, energy and green infrastructure. We are pleased that investment programmes will be low carbon and resilient to the impacts of climate change.
51. Investment in Green Infrastructure should include the future costs of management and maintenance in the long term. Consider whether to incorporate green and blue infrastructure (i.e. The Thames and its tributaries, lakes, ponds and canals).
52. A framework for delivery of green infrastructure established at a pan-London level should help design and support delivery of biodiversity enhancements at the habitat/landscape-scale.
53. Local planning authorities should also be encouraged to have biodiversity aims at the forefront during the design of new and improvement of existing green infrastructure.
54. There is obvious value in looking at green infrastructure holistically (ensuring that multiple benefits can be fully captured), however, there is potential for tensions if outcomes are not aligned – for example where land use changes would adversely impact on biodiversity sites. This could be overcome by having a multi-disciplinary team involved in the development of such a network. Such a team should include project ecologists, building and landscape architects, NGOs (such as the RSPB and The Wildlife Trusts who can bring wider knowledge of wildlife and community engagement), specialist designers of biodiversity enhancement

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<sup>6</sup> Association of Local Government Ecologists (November 2013): Ecological Competence in English Planning Authorities. What is needed to deliver statutory obligations for biodiversity. See here: <http://www.alge.org.uk/publications-and-reports>

features (such as green roofs/walls and SuDs) as well as practitioners from other sectors such as health.

55. The existing Green Infrastructure Task Force would be a good place to start (re: drawing together a network of experts). The recent report *Natural Capital: Investing in a Green Infrastructure for a Future London*, prepared by the GLA on behalf of the Task Force has a number of helpful recommendations on green infrastructure in London (we do, however, draw attention to our points on biodiversity offsetting as set out above).
56. A holistic green infrastructure framework would provide a clear steer to local planning authorities to support the preparation of local green infrastructure strategies.
57. The future management of a holistic green infrastructure network will be critical. A unified approach to green infrastructure management across London would ensure that the wildlife benefits of green infrastructure are fully built into management prescriptions.
58. The provision of a new holistic green infrastructure framework for London could refresh the existing All London Green Grid (ALGG) providing a briefer vision and strategy for green infrastructure for London with a set of detailed projects (making use of the existing ALGG document) at the back.

## **QUALITY OF LIFE**

59. We are pleased that the document recognises that quality of life in London will increasingly be defined by the environment and the way that the city and the businesses that operate there respond to climate change. Quality of life should include scope to protect and restore biodiversity, providing access to high quality green infrastructure (including urban green space) alongside development and the ongoing provision of ecosystem services and natural capital benefits. Contributing to quality of life should be seen as a positive opportunity for business not as a burden or something to react to.
60. Climate change is one of the greatest long-term threats to wildlife, and the RSPB has campaigned for ambitious climate action at national, sub-national and international levels including the UK Climate Change Act 2008 and the Paris Agreement in 2015. We are pleased that London is a member of the C40 Cities and is taking leadership to address climate change. We believe London has a unique opportunity to show wider leadership on climate change and could work to constructively influence Government – for example, by calling for reinstatement of the zero carbon homes standard.

## **PART 4 ENVIRONMENT, TRANSPORT AND PUBLIC SPACE**

### **APPROACH TO THE ENVIRONMENT**

61. While we support the overall strong environmental messaging throughout the document, we look forward to seeing a more detailed Draft Environmental Strategy in spring 2017.

#### **Integration**

62. We agree with the premise of seeing multifunctional benefits from environmental protection and enhancement and with the value of planting appropriate native tree species along streets.

#### **Enhancing the environment**

63. **Nature-based approaches:** We support the reference to nature-based approaches to drainage as a positive option to alleviate flood risk, and offer a reminder that nature-based approaches can be used for climate resilience as well.

64. **Carbon offsetting:** carbon offsetting should be treated as a last resort when it is really not possible to reduce emissions onsite. It is important it always provides additionality (i.e. ensuring that the offsite measures would not have taken place anyway) and should always be limited to energy efficiency and low carbon energy provision, not tree planting where emissions reductions are temporary and reversible. Tree planting can have biodiversity and emissions reductions benefits but these should not be offset against important emissions reductions achieved by reducing fossil fuel use.

### **Low-carbon economy**

65. We agree that all businesses should take the steps needed to lower their carbon emissions. The Draft London Plan and supporting strategies should provide further detail on this proposal in order to provide guidelines to businesses on how they are expected to lower their carbon footprint.

## **A HEALTHY, RESILIENT, FAIR AND GREEN CITY**

66. **Road Transport and building emissions:** Ultimately, reducing the need to travel at all through careful planning is the best way to eliminate emissions from the transport sector (the Mayor should consider mixed use developments providing housing and employment opportunities together). However, we also support efforts to de-incentivise high-polluting vehicles such as charging and ultra low emissions zones.
67. We support the shift to green buses (hybrid or zero emission); however it is important to prioritise modal shift, electrification and other technologies over the use of biofuels for road transport. Many types of biofuel can result in emissions increases relative to conventional fossil fuel petrol and diesel, or deliver at best meagre emissions savings. The reliance on large areas of land for crops can also have severe negative environmental impacts.
68. In order to support the Mayor's vision for improved air quality and to provide carbon dioxide emissions reductions, we support all new buildings in London becoming air quality positive (this means they will have to contribute actively to a progressive reduction in the total amount of London's emissions and associated exposure).
69. Urban greening measures such as green walls and green roofs can play a role in improving air quality and opportunities should be sought to incorporate these into new development. As mentioned earlier, such features should also be designed to deliver biodiversity enhancements.
70. We support the proposed asks to the UK Government of:
- A 21<sup>st</sup> Century Clean Air Act.
  - Reform of Vehicle Excise Duty to incentivise the purchase of greener, cleaner vehicles.
  - Diesel scrappage scheme.
  - Government not watering down air quality standards currently set by EC after UK has withdrawn from the EU.

## **A RESOURCE-EFFICIENT CITY – ZERO CARBON BY 2050**

71. Climate change is the greatest long term threat to wildlife with an estimated 10% of the world's species pushed to the brink of extinction with every degree centigrade rise in global temperatures (compared to pre-industrial averages). Emissions need to be reduced urgently but in a way which avoids further degradation of biodiversity. As the capital, London has an important leadership role in addressing some of the biggest challenges our urban environments pose to mitigating climate change. We therefore support the overall challenges

and opportunities that the document identifies in relation to energy and the overall ambition to ensure London is zero carbon by 2050.

72. The RSPB's 2050 Energy Vision outlined a number of priorities for achieving very high levels of renewable energy by 2050 in harmony with nature. The key recommendations that are very relevant to London are the need to substantially increase energy efficiency measures and to invest in wide and rapid roll out of technologies such as rooftop solar installations. We would be pleased to discuss with the Mayor how our Energy Vision peer-reviewed mapping methodology could be used to help identify suitable sites for renewable and low carbon energy.
73. We welcome the proposed Mayor's detailed roadmap for reducing carbon. This must be published as soon as possible in order to meet the ambition of being a zero-carbon city by 2050. In the meantime, rapid mitigation action should proceed immediately alongside the development of the roadmap and not wait on its publication. Any delay reduces the chances that the city will meet its emission reduction targets. All roadmap scenarios should also take into account obligations and commitments to protect the natural environment (including avoiding direct, indirect or cumulative impacts on recognised nature conservation interest) and look for opportunities for enhancement where possible.
74. Embracing a low carbon energy system required to meet the zero carbon goal will require a fundamental rethink of London's overall energy strategy. We support developing a positive vision for a sustainable, low carbon energy system.
75. **Mitigation and Adaptation:** We agree that to mitigate future climate change effects, Londoners must use resources more effectively and efficiently, reduce reliance on fossil fuels and other unsustainable materials, develop a circular economy to reduce waste, and reduce dependency on cars. However, to address the changes that are already being experienced in London, such as warmer, wetter winters and hotter, drier summers, as well as extreme weather events, we must also adapt to the climate change effects we are already facing. Taking immediate adaptation action will help to build a resilient city now and into the future.
76. Whilst building resilience is critical in respect of new developments, improving the resilience of existing developments and infrastructure will also be important.

### **Heating our homes**

77. We support the Mayor's intention to shift London from a reliance on gas boilers to renewable heat options. We agree that innovative uses of London's waste heat opportunities should be adopted as the norm and welcome progress already made where waste heat is already adopted in parts of London.
78. When considering alternative heat generation options, where utilisation of waste heat is not an option we would recommend that London encourages a focus on the electrification of heat. We would like to see strong support for ground and air source heat pumps for heating, as widely adopted by homeowners in Germany and Scandinavia. While ground source and air source heat pumps can be seen as less effective, if coupled with energy efficiency improvements, the level of heating required in a home is reduced thus making heat pumps much more viable.
79. Reversible air source heat pumps also allow for heating and cooling. This technology therefore appears to be appropriate and efficient in urban areas where both energy issues and resilience to a changing climate must be addressed, avoiding the need for two separate systems.
80. Burning woodfuel (biomass) should not be incentivised because many forms of bioenergy deliver questionable emissions savings or can even result in emissions increases. The type of feedstock used and the way it is harvested can also have detrimental impacts on the

natural environment. The limited available supply of sustainable biomass also means that it should be targeted towards the hardest to decarbonise sectors – aviation and heavy industry.

### **Better buildings**

81. **New buildings:** We strongly support the Mayor's intention to ensure all new homes built in London are zero carbon. Indeed we would support the development of net negative emissions buildings and developments where renewable energy generation is incorporated into the development to assist with emissions reductions across the city, where retrofitting measures are challenging to achieve (e.g. heritage buildings). We support the use of innovative building techniques and materials in new construction that will enhance efficiency to create better buildings and to better control energy costs for Londoners.
82. The major barrier to zero-carbon homes is often quoted to be the additional cost to base build, but these costs<sup>7</sup> have been demonstrated to only contribute to minimal increases in house prices. Furthermore, when considering the need to balance affordability and quality of new housing stock, it must be remembered that by requiring very high levels of energy efficiency, and the installation of renewable generating capacity, London will be ensuring that houses are affordable to live in.
83. **Retrofitting:** Additionally, as a dense urban environment with a significant amount of old housing stock, we agree that a priority for London should be the retrofitting of existing building stock. We are pleased to see the ambition to aim for net-zero-energy retrofitting and to tackle a wide range of energy improvements (not just energy efficiency) needed as part of a flagship scheme for Londoners.
84. The major barrier to retrofitting of existing buildings is availability of capital and willingness of Londoners to take action. It cannot be assumed that if the funding issues are addressed action by householders will follow; many issues from trust of installers to the simple inconvenience of installation work can prevent action by householders who might in principle agree with the need for change. Concerted action will be needed to transform societal attitude towards home improvements relating to energy.
85. A substantial amount of work has been done over the years to look at the behavioural science behind why people choose to act or not act, including by the UK Government's Behavioural Insights team. Further work has been done recently specifically on the issue of energy efficiency uptake in the US, the resulting report from the American Council for an Energy-Efficiency Economy (ACEEE) can be found [here](#). The GLA may find it useful to consider the findings of this and how it might apply in the London context when designing new policies.
86. In the recent '[Future low carbon investment in the UK](#)' report, we highlighted that by taking advantage of the city's underutilised rooftops, London could become the world's largest solar park and generate 23% of its power needs, and support an estimated 6,400 full time jobs a year until 2030. We suggest that the Mayor could also play a constructive role in influencing improvements in the national policy framework relating to both solar retrofitting and energy efficiency improvements to building stock.

### **Energy for Londoners**

87. We support the creation of the Energy for Londoners flagship scheme to cover energy supply and efficiency. More must be done to generate a cohesive plan to increase green energy and energy reduction and provide clear avenues for building retrofits and efficiency programmes. The Energy for Londoners scheme must ensure the most efficient home systems are achieved, including the adoption of ground source and air source heat pumps.

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<sup>7</sup> <https://protect-eu.mimecast.com/s/RKwKBsKAqxc7>

## CYCLING AND WALKING

88. To successfully encourage additional cycling and walking the Healthy Streets initiative must make good on its ambition to ensure these are easier, safer and more accessible options. Only then, will the full benefit of reduced traffic and decreased air pollution be seen. We welcome the suggested measures and would like to see these stay prominent and clear in the full London Plan, not just the Environmental Strategy.
89. We note the aim to deliver a pedestrianised Oxford Street. In taking forward this vision we strongly recommend that the space, of this and other similar such schemes under consideration, be designed for people and wildlife and opportunities taken to 'green the grey', for example, through use of SuDs features. The current image (of a pedestrianised Oxford Street) included in the document does not represent a scenario where urban greening is optimised.

## PUBLIC SPACE

90. We recommend undertaking an audit of public spaces to see how well London's public space delivers a range of environmental services. These might include:
- Access to nature for the city's residents, which has proven mental and physical health benefits.
  - Homes for wildlife and opportunities for biodiversity enhancement.
  - Sustainable drainage and rainwater harvesting
  - Reducing air and noise pollution
  - Opportunities for recreation and improved health
  - Reducing the urban heat island effect
  - Increasing the understanding of the value of water amongst Londoners
91. **Higher density:** We would expect all new high density developments to be built to the highest standards of design and sustainability.
92. **Inclusive nature and access to nature:** It is important that all residents, including children and the elderly, have access to nature (see our comments under Part 5 for more details). To provide this, we must protect, enhance and improve access to green space. In terms of new development/redevelopments, consider incorporating multi-level green spaces into new, higher density developments (whilst seeking to protect existing spaces of high value to nature conservation) using architectural design styles and seek to include green roofs.
93. Access to nature and the development of green infrastructure should also be incorporated into affordable housing initiatives to ensure that everyone has access to natural spaces and that an increase in green infrastructure does not price individuals out of their homes.

## GOOD ARCHITECTURE AND DESIGN

94. We support the aim to keep built and landscape design standards high in the built environment. Every opportunity should be taken to link landscape features into new buildings and neighbourhoods – for example, including landscape features as part of SuDs in streets and walkways. All green spaces / greenery should be designed to deliver multiple benefits (e.g. for wildlife and access to nature, to support sustainable drainage and to reduce the urban heat island effect). A unified approach to green infrastructure management across London should be adopted – this would ensure that the multi-functional benefits of green infrastructure (including for wildlife) are built into management prescriptions.
95. We have produced Guidance on maximising the potential of Sustainable Drainage Systems for people and wildlife – see here: [https://www.rspb.org.uk/Images/SuDS\\_report\\_final\\_tcm9-338064.pdf](https://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf)

## PART 5 A CITY FOR ALL LONDONERS

### A FAIRER MORE EQUAL SOCIETY

96. We note that the Mayor will publish a new equality framework, which will include a detailed analysis of London's equality challenges. We recommend that this includes analysis of easy access to high quality green space and access to nature, to inform future policy around improving areas of deficiency.

### HEALTHY LONDON

97. We are pleased that health considerations will run throughout future Mayoral policies and supporting strategies (e.g. in respect of issues such as air quality, quality housing, healthy streets, and access to vibrant public spaces).
98. The Good Growth sub-section of Part 1 of the document mentions the importance of access to green space on physical and mental health. The future of a healthy London is interwoven with a greener, sustainable London. In the Mayor's Manifesto childhood obesity is outlined as a major issue confronting London. Improving access to and protecting high quality green spaces is one way to improve childhood health. It can also help support people's general wellbeing and reduce health inequalities.

### Social Benefits of Protecting and Enhancing Biodiversity near Housing Developments

99. Incorporating nature in and around where we live not only improves the natural environment and biodiversity, but is also good for our health and wellbeing. The social benefits of nature are receiving more recognition in scientific literature.
100. For example, obesity is a growing burden on the NHS and it has been shown that those with easy access to nature are three times more likely to participate in physical activity and 40% less likely to become overweight or obese<sup>8</sup>. The Monitor of Engagement with the Natural Environment's (MENE) Annual Report from 2013-14 survey highlighted that 45% of people asked, stated that one of the main reasons they went into the natural environment was for health or exercise. A further 29% said they visited the natural environment to relax and unwind<sup>9</sup>. **This highlights the importance of having accessible natural environments around housing developments to both support exercise regimes but also to support people's mental health and wellbeing.**
101. The benefits of nature on people's mental health are widely reported within scientific literature, however, recently it has become apparent that the quality of the natural environment may be more important than the quantity of it. People are twice as likely to report low psychological distress when living close to quality green space compared with those living near low quality green space<sup>10</sup>. **Therefore, it is important not only to plan for easy access to green spaces in our living environment but also to improve the quality of these green spaces – incorporating greater levels of biodiversity in our green spaces could be one way to achieve this.** This will not only improve mental health outcomes and general wellbeing but it will help to create new habitats for biodiversity across the UK and in particular in our urban areas.
102. Accessibility to green spaces around housing developments is not only important for reducing health inequalities but there are links between economic deprivation and limited access to nature, which could then lead on to health inequalities<sup>11</sup>.

<sup>8</sup> Wells, N.M., Ashdown, S., Davies, E.H.S., Cowett, F.D. and Yang, Y. (2007) Environment, design and obesity. Bowler, D.E., Buyung-Ali, L.M., Knight, T.M., and Pullin, A.S. (2010). *A Systematic review of the evidence for the added benefits to health of exposure to natural environments*. BMC Public Health, 10: 456-466.

<sup>9</sup> MENE: Annual report from the 2013-2014 survey v2. <http://publications.naturalengland.org.uk/publication/6579788732956672?category=47018>.

<sup>10</sup> Francis, J., Wood, L.J., Knuiman, M., and Giles-Corti, B. (2012) Quality or Quantity? Exploring the relationship between Public Open Space attributes and mental health in Perth, Western Australia. *Social Science and Medicine* 74: 1570 – 1577.

<sup>11</sup> Allen, J. (2013) *Health Inequalities and Open Space*. Presentation. UCL Institute of Health Equity.



103. Integrating new and improving existing green spaces around housing developments will help improve health and wellbeing outcomes and will help to reduce social inequalities in the local communities it supports. A recent report by Natural England<sup>12</sup> found that if people lose their access to convenient, quality greenspace this could lead to a reduction in physical activity. This could then lead to an additional 374 deaths per year, with an economic cost of £434 million per year; with a further 2,300 additional cases of life-limiting diseases equating to an additional £23.6 million per year. A further article from the University of Exeter has also estimated that green spaces are worth £2.2bn to public health in England, again through providing opportunities for physical exercise<sup>13</sup>. Therefore, providing access to good quality green spaces that are biodiversity rich is likely to be important not only for individual physical health and wellbeing but our health economy as well. If we also took into account the mental health benefits that nature could provide, the economic benefits of nature could be even higher than the above estimates.
104. Over the last ten years we have been looking at how connected children are to nature and the importance of this for their health and for how this relates to pro-nature and pro-environment behaviours<sup>14</sup>. Our 2013 study on connecting to nature<sup>15</sup> found that only 21% of children had a level of connection to nature that we view as a realistic and achievable target for all children. Through our wider research, we know that greater levels of connection to nature correlate with better self reported health and engagement with pro-nature or pro-environment behaviours. Therefore, we need to ensure there are good quality green spaces in housing developments and near schools to allow children to develop healthy connections with nature.
105. The World Health Organisation claims 16,000 Britons die each year as a result of air pollution ([Ambient air pollution: a global assessment of exposure and burden of disease](#)). Increasing cycling and walking facilities with associated green infrastructure would improve London's air quality and environment while encouraging Londoners to be more active.
106. Extreme weather events are increasing in frequency and the Mayor's Office acknowledges the contribution densification adds to increased temperatures. Incorporating more green space would help reduce the heat island effect and allow for better absorption of heavy rainfalls which have added extra burdens and costs to the Capital's emergency services, notably the extra call-outs placed upon the Fire Service to respond to flooding.

<sup>12</sup> ROLLS, S., FORDHAM, R. & SUNDERLAND, T. 2016. Investigating the potential increase in health costs due to a decline in access to greenspace: an exploratory study. Natural England Research Reports, Number 062.

<sup>13</sup> White MP, Elliott LR, Taylor T, Wheeler BW, Spencer A, Bone A, Depledge MH, Fleming LE, Recreational physical activity in natural environments and implications for health: A population based cross-sectional study in England, *Preventive Medicine* (2016), doi: [10.1016/j.ypmed.2016.08.023](#)

<sup>14</sup> The Impact of Children's Connection to Nature: A Report for the Royal Society for the Protection of Birds (RSPB). (2015). [http://www.rspb.org.uk/Images/impact\\_of\\_children%E2%80%99s\\_connection\\_to\\_nature\\_tcm9-414472.pdf](http://www.rspb.org.uk/Images/impact_of_children%E2%80%99s_connection_to_nature_tcm9-414472.pdf)

<sup>15</sup> Connecting with nature: Finding out how connected to nature the UK's children are. (2013) [http://www.rspb.org.uk/Images/connecting-with-nature\\_tcm9-354603.pdf](http://www.rspb.org.uk/Images/connecting-with-nature_tcm9-354603.pdf)