

## Comments received on the SA Scoping Report- January to March 2013.

Organisation	Comments Received
Environment Agency	<p data-bbox="488 233 2051 331">Thank you for consulting us on the Sustainability Appraisal (SA) scoping report which will be used to appraise the LLDC's emerging Local Plan. We welcome the opportunity to comment on the key issues, baseline data and proposed objectives. Our response is structured according to your consultation questions.</p> <p data-bbox="488 368 2051 432">Please note we have not been able to provide comments on the Habitats Regulation Assessment scoping report. However, if there are specific areas you would like our help with please let me know.</p> <p data-bbox="488 469 2051 533">Overall we thought the scoping report had a good coverage of the key issues. We have suggested some changes or additions to improve the scope of the SA. Hyperlinks are inserted to help direct you to relevant data sources.</p> <p data-bbox="488 569 2051 633"><b>(a) – Are there any key emerging plans, initiatives and environmental protection objectives that you consider should be identified as part of the assessment process?</b></p> <p data-bbox="488 670 2051 906">Although the Water Framework Directive (2008/98/EC) is listed in Appendix A under International Plans, the Thames River Basin Management Plan (TRBMP) which is the regional strategy for implementing the WFD is missing from the Regional and Sub-regional plans section. This should be included because the LLDC area is part of the spatial plan for the Thames Catchment area. The LLDC waterbodies are classified in the Thames RBMP in terms of their current water quality status as a result of initial investigations. The Thames RBMP outlines proposed actions (measures) needed for water bodies to achieve good status and prevent deterioration. Actions may be carried out by a range of 'co-deliverers' including local planning authorities and developers.</p> <p data-bbox="488 943 2051 1075">2015 is identified as the deadline by which waterbodies in the UK would need to reach good ecological status or potential under the WFD. However, RBMPs run in six-yearly cycles and 2015 represents the start of the second phase of the River Basin Management Plan. 2027 is the final deadline for reaching good status under WFD.</p> <p data-bbox="488 1112 2051 1377">The recently published Thames Estuary 2100 plan (TE2100) should be identified as a relevant plan under the Regional and Sub-regional plans section of Appendix A. The River Lee and Lee Navigation in the LLDC area are tidally influenced and the TE2100 plan puts forward actions to ensure the flood defences are fit for purpose both now and in the future. The LLDC area falls within two policy units: Isle of Dogs and Lea Valley (P5) and Royal Docks (P4) of Action Zone 3 (see pages 115-132). The vision for the Isle of Dogs and Lea Valley area is to have a flood defence system that can provide an increasing level of protection against climate change with defences integrated with new developments wherever possible. The vision for the Royal Docks is to modify the layout of defences and integrate them into new developments where possible also improving their appearance with environmental enhancements and amenity space. It</p>

## Comments received on the SA Scoping Report- January to March 2013.

is essential the TE2100 plan recommendations and actions are integrated within this Sustainability Appraisal to help ensure the Local Plan is TE2100 compliant.

The National plans section should include the Environment Agency's Groundwater Protection: Principles and Practice (GP3, dated November 2012) because the LLDC area is affected by a legacy of previous industrial development and potential contamination. This document outlines our position on how developments should protect our groundwater through appropriate location, mitigation and the appropriate steps to investigate and remediate land contamination. The Thames Catchment Flood Management Plan should also be listed as a regional plan. Alongside the TE2100 this sets the overall approach to flood risk management for the whole River Thames catchment, including the River Lee and Thames Estuary.

Waltham Forest carried out and published both Level 1 and Level 2 Strategic Flood Risk Assessments which need to be identified and listed under the Local Plans section of Appendix A. The Level 2 SFRA represents the most up-to-date spatial assessment of flood risk in Waltham Forest. We also noticed that the boroughs Surface Water Management Plans (SWMPs) were not included on the Local list. The SWMPs in most cases contain the most up-to-date spatial data and recommendations on 'local' flood risk e.g. surface water, groundwater, sewer flood risk.

**(b) – Can you recommend any important information sources to supplement the baseline data we have collated?**

### B.5 Water

The boroughs SWMPs were not included as relevant baseline data showing spatially how the areas are affected by surface water flood risk (critical drainage areas and local flood risk zones). This needs to be included because the boroughs SFRA's are unlikely to have been updated to include this information. For Waltham Forest the Preliminary Flood Risk Assessment has been used and we would have thought the level 2 SFRA would be a more appropriate source of baseline data for this borough.

### B.12 Minerals and Waste

The baseline data shows selected data for household waste production and recycling in each borough. Baseline data for Commercial and Industrial waste production is important because a large element has to be treated the same as household waste and will be counted towards targets for recycling and the Waste Hierarchy. It is likely that this area will generate a significant quantity of commercial and industrial waste. Commercial and Industrial waste production data is available from the 2010 Defra survey (Defra website) and Construction 3

Demolition and Excavation Waste could be extrapolated from the Environment Agency's survey of Welsh plant (Building the Future 2005-06).

## Comments received on the SA Scoping Report- January to March 2013.

There should also be data for hazardous waste arising or construction and demolition waste. Data on hazardous waste is available from our website (Hazardous Waste Interrogator). Please note there is also the Datashare service available from our website – this also has datasets for Natural England, Forestry Commission, English Heritage and Canals and Rivers Trust.

### **(c) – Do you agree with the sustainability issues we have identified? Are there additional issues that both the assessment and the local Plan should consider?**

On the whole the scoping report has identified most of the key issues, however, we have made comments on how these can be improved through revisions and missing elements that should be included.

#### 5.3.5 Water

The first bullet recognises the River Lee, Lee Navigation along with smaller watercourses and ponds which may impose constraints on new developments. Although we welcome this inclusion we think this issue should be revised to reflect the Thames RBMP. This bullet should state what the current water quality status of these rivers are in the Thames RBMP (e.g. 70% of our rivers have poor ecological status), summarise the main reasons for failure and suggest that future development can contribute to ensuring these rivers achieve good ecological potential through sustainable development measures, restoration and enhancement. A positive relationship can exist between developments and waterways. Watercourses can be an important asset / key feature in developments and we think this potential positive relationship should be highlighted, rather than seen as a ‘constraint.’

We are pleased that you have identified fluvial and tidal flood risk as a key issue for the LLDC area. However, this bullet should also recognise surface water and groundwater flood risk using the boroughs Surface Water Management Plans as the baseline for this characterisation.

The area also has a network of flood defences in order to manage the risk of fluvial and tidal flooding and some of these are in poor condition. As with all significant infrastructure, these require maintenance, repair and replacement over their lifetime and associated with that there is a residual risk of overtopping and failure of the defences. Flood defence infrastructure and the need to ensure these are maintained, repaired and replaced should be identified as a key issue for the LLDC area. This also reflects the actions and recommendations in the TE2100 plan.

The fourth bullet needs to recognise that the LLDC area falls within a ‘water stressed’ area identified in our 2008 document ‘Water resources in England and Wales – current state and future pressures’ to help characterise the existing water resource situation. This means that in London and the South East there is high population with high water demands and limited water availability – it does not reflect water companies ability to supply water. Grey water recycling

## Comments received on the SA Scoping Report- January to March 2013.

is from washing water e.g. showers and washing machines, not from rainwater. Water efficient fixtures and fittings should also be noted as examples of how developments can reduce water use.

The fifth bullet states that new development should be encouraged to use Sustainable Drainage Systems to manage runoff and further reduce flood risk. We don't believe this is strong enough because this doesn't reflect the evidence in the SWMPs or the requirements of the London Plan policy 5.12 / Floods and Water Management Act 2010. New developments should be 'required' to use Sustainable Drainage Systems to reduce runoff and ensure there is no increase in flood risk.

It is good that the last bullet identifies that groundwater quality should be protected. However this doesn't describe the character or importance of this groundwater. Our maps show that the LLDC area is underlain by a secondary aquifer which stores groundwater (e.g. the Lambeth Group – clay, silt and sand) and Source Protection Zones 1 and 2 indicate the presence abstraction points for water supply at Old Ford and Stratford Box.

### 5.3.6 Soil and Land Quality

We thought the last bullet 'any contaminated land encountered' was too passive and we'd prefer this to state that the LLDC area will be assessed for contamination and where it is found the soil and groundwater will be remediated.

### 5.3.7 Air Quality

The air quality section should mention encouraging sustainable construction particularly through site waste management plans to reduce particulate pollution and source materials locally.

### 5.3.8 Energy and Climate Change

This section misses out adaptation to climate change which is just as important as mitigation measures e.g. through reducing carbon footprint and energy use through renewables. There should be an additional bullet summarising the importance of adaptation to climate change through flood risk resistance and resilience measures, green infrastructure and sustainable construction techniques e.g. ensuring populations keep cool during rising temperatures by locating houses at the correct orientation, using insulation, shutters, shading etc.

### 5.3.9 Biodiversity, Flora and Fauna

We support this section and particularly welcome the last bullet point stating that opportunities, where possible, should be sought to develop and enhance a network of public open space, green grid infrastructure and the blue ribbon network within the LLDC area. We also welcome the statement that existing habitats such as water features should be retained but would also add there is an opportunity to create new habitats as well as protecting the existing ones.

We support the statement that 'there is a need to consider Biodiversity Action Plan commitments.'

## Comments received on the SA Scoping Report- January to March 2013.

### 5.3.12 Minerals and Waste

The Waste Hierarchy starts with reduce, then reuse and then recycle. Bullet three should be revised to reflect the Waste Hierarchy by inserting 'reduce' before reuse.

### 5.3.16 Housing

Bullet five on 'housing regeneration' should also include retrofitting for climate change and water resource reduction.

### **(d) – Are there any changes you consider should be made to the proposed assessment objectives and indicators?**

On the whole we think the proposed objectives, targets and indicators cover the key issues well. However, we recommend some changes to table 6-1 SA Objectives, Indicators and Targets as follows:

#### 7. To encourage sustainable economic growth, inclusion and business development

Improving the resilience of businesses and the economy to extreme events (which may be associated with climate change) e.g. fluvial, tidal or surface water flood risk, will enable businesses to bounce back quicker. Climate Local is a Local Government Association initiative which was launched in June 2012 enabling the Councils that sign up to share information about their local climate change priorities and actions to reduce carbon emissions and be resilient to a changing climate. LLDC could consider (based on a climate change risk assessment of their area) what local priorities and actions are needed to protect the economy (and other sectors) and, for example, encourage businesses to commit to some or all of these actions. We suggest the sub-objective 'support the development of green industries and a low carbon economy' should include 'resilience to climate change.' We are unsure at this stage how this could be measured however targets could be to 'increase the number of businesses committed to reducing carbon emissions and building in resilience' and/or 'the number of green industries.'

#### 9. To protect and enhance biodiversity

The data contained in the Thames RBMP on the current classification of waterbodies will be a useful way of measuring (as an indicator) the sub-objective to 'protect and enhance the area's water bodies (e.g. River Lee, Lee Navigation) to achieve good ecological potential.' The current status of the River Lee and Lee Navigation could be a useful indicator e.g. 'low', 'moderate', 'good', as these reflect in part the ecological health of these watercourses. The targets should include 'waterbodies within the LLDC area reaching good ecological status or potential.' The source of this data is Annex B of the Thames RBMP. The watercourses within the LLDC are assigned a unique reference number and are currently classified as follows:

- River Lee, from Tottenham Locks to the Tideway (GB106038077852) - current status is moderate.

## Comments received on the SA Scoping Report- January to March 2013.

- River Lee Navigation, tidal section (GB70610068) - current status is moderate.
- Regents Canal, lower section (GB70610510) - current status is moderate.

All these watercourses are classed as heavily modified and the target is to reach good ecological potential by 2027. We are currently progressing with the second phase of the River Basin Management Plans by looking in detail at what locally specific actions are technically and financially feasible. The target related to this objective should be that the LLDC waterbodies will reach good ecological potential by 2027. Furthermore there should be no deterioration in a current water body status as a result of development or policy approach.

12. To protect and enhance the quality of water features and resources and reduce the risk of flooding

We support the sub-objective 'Reduce and manage flooding.' The indicators only refer to fluvial flooding and we think there should also be indicators on tidal and surface water flood risk e.g. the distribution of areas at risk from surface water flooding. The data source would be (at present) the boroughs Strategic Flood Risk Assessments and Surface Water Management Plans until LLDC collate this data for their Local Plan. Targets could include 'reduction in fluvial, tidal and surface water flood extents;' 'all developments safe from the impacts of flooding and not increase the risk of flooding elsewhere' and 'all development include sustainable drainage systems reducing runoff rates.'

In line with our earlier comment, there should also be a sub-objective on maintaining (through replacement or repair) flood defences to ensure an appropriate level of flood protection is achieved for existing and new developments. Some of the existing flood defences are in poor condition or will require upgrading in the future to fit with climate change predictions (see TE2100 plan). The target would be for flood defences providing an adequate level of protection for the lifetime of developments taking into account climate change.

We support the sub-objective to improve the quality of waterbodies with a target included to 'protect, enhance and restore all bodies of surface water and groundwater with the aim of achieving 'good' ecological/chemical status by 2015.' 2015 should be amended to 2027 as the final deadline laid out in the Water Framework Directive. As mentioned for objective 9 above the indicator could be the current classification of the waterbodies from Annex B of the Thames RBMP.

The sub-objective on reducing discharges to surface and groundwater is good though we thought this should also mention the potential for harmful discharges (e.g. polluted runoff from car parks, roads). This ensures the water quality aspect of discharges is recognised as well as the quantity of runoff which could increase flood risk.

The sub-objectives on 'encourage sustainable use of water resources' and 'encourage the inclusion of flood mitigation measures such as SuDs' could be stronger by 'requiring' rather than 'encouraging' and there is evidence to support this approach. The average water consumption in 2008-09 across the boroughs of Hackney, Newham, Waltham Forest and

## Comments received on the SA Scoping Report- January to March 2013.

Tower Hamlets was 160 litres per person per day which was higher than the national average of 148 litres per person per day. There is more data available in the individual London Borough 'State of the Environment Report' factsheets on our website. Furthermore, the SFRA/SWMPs demonstrate the area is at risk from fluvial, tidal and surface water flood risk. The Floods and Water Management Act is setting the direction for Local Authorities to be assessing and ensuring all developments adopt SuDs to reduce runoff and alleviate pressure from the sewer network.

13. To limit and adapt to climate change

The only sub-objective on adaptation is 'to require the inclusion of SuDs in new development.' We suggest objectives, indicators and targets are included which focus on adapting to the impacts of climate change, for example, flood risk resilience measures, green infrastructure, water efficiency and sustainable construction techniques to reduce the impact from rising temperatures. The Planning and Climate Change Coalition guidance (April 2012) stresses that mitigation and adaptation are two vital components of a holistic and coherent response to climate change and that adaptation is sometimes regarded as a secondary priority.

**(g) Do you have any further suggestions regarding the scope of the SA and the proposed approach to appraise the Local Plan?**

We find it easier to understand matrices when there is some explanation as to why the impact is considered positive, negative or neutral i.e. brief commentary. Where negative impacts are identified a more detailed explanation of how the impact will be avoided, offset or mitigated is helpful, especially in terms of how the Local Plan strategic sites or issue-based policies will be revised to ensure this happens.

Section B.17 Transboundary Issues in Appendix B Baseline Data

The fluvial flood risk in Hackney Wick also affects the London Borough of Hackney and a smaller area of the London Borough of Tower Hamlets. Hackney's Level 2 SFRA identified a possible flood alleviation scheme involving a sheet piled flood defence along the Lee Navigation in both boroughs, with a compensatory flood storage area upstream in Hackney Marshes. Surface water flood risk and the measures to manage this may also be a transboundary issue e.g. surface water runoff from one borough having an impact on a neighbouring borough. LLDC will need to work in partnership with the neighbouring boroughs to ensure flood risk is reduced for future generations. The baseline data can be sourced from the boroughs SFRA and SWMPs.

### **Conclusion**

We have suggested changes to some of the key issues identified and objectives based on available evidence. It's important that the Thames RBMP, TE2100 and SWMPs feature within the Sustainability Appraisal baseline data, key

## Comments received on the SA Scoping Report- January to March 2013.

	<p>issues and SA objectives, indicators and targets. We hope you find our comments helpful and welcome any feedback you may have. If you have any queries or require clarification on any of our comments please do not hesitate to contact me.</p>
English Heritage	<p>Thank you for consulting English Heritage on the Corporation's Strategic Environmental Assessment and Sustainability Appraisal (SEA/SA) draft Scoping Report for the emerging Local Plan. As the Government's Statutory Advisor on the Historic Environment, English Heritage has the following comments to make:</p> <p>The National Planning Policy Framework (NPPF), paragraph 126, requires Local Planning Authorities to set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area. The SA Scoping Report helps fulfil this duty by ensuring that impacts on heritage assets and the wider historic environment can be effectively identified, mitigated against and monitored over the lifetime of the plan. With this in mind we have the following suggestions to make that will strengthen the scoping report in regard of the historic environment.</p> <p><i>5.3 Key Sustainability Issues and Opportunities</i></p> <p>Overall the Local Plan should seek to conserve and enhance the significance of all heritage assets. This includes the development of a positive strategy to broaden understanding and access to the historic environment (e.g. achieved through dissemination of archaeological investigations), and improve the conditions of heritage assets by enabling a reduction in the number of assets 'at risk' (as identified by the English Heritage's Heritage at Risk (HAR) Register). The current wording suggests the assets at risk should be conserved and enhanced 'where possible'. This approach is considered not to be sufficiently robust as contrary to the NPPF.</p> <p>On considering the details provided the range of heritage assets is limited. The heritage baseline should be broadened to include designated and non-designated heritage assets. For example the Boroughs which fall within the Local Plan area have identified locally listed buildings. There is also key baseline data on the historic environment, principally non-designated, held on the Greater London Historic Environment Record (GLHER). The significance of this information and the assets it identifies should be captured in the appraisal process. In addition it is important to identify and understand the setting of all heritage assets. As expressed in the NPPF the setting of a heritage asset can contribute to its significance. This important issue needs to be captured in the appraisal of the Local Plan. This includes opportunities to enhance and better reveal the significance of heritage assets, which can often be achieved through responsive developments within the setting of heritage assets.</p> <p>It should be noted that the Newham's Archaeological Priority Areas (APA) are being reviewed, with an expectation of it being completed in March 2013. In the meantime we would advise that APAs do exist in other Boroughs and which do cover the Local Plan area. They are often titled differently. For example in Tower Hamlets the Borough defines APAs as Areas of Archaeological Importance.</p>

## Comments received on the SA Scoping Report- January to March 2013.

### 6.2 Development of the Sustainability Objectives SA Objective and Sub Objectives 11

Indicators & Targets – We would advise that the number of heritage assets on the English Heritage’s HAR Register should be instead of number of conservation areas and listed buildings.

The target for this indicator should be to reduce the number of assets on the HAR Register, and not to ensure no additional assets are added.

A new indicator which could be added relates to Conservation Area Appraisals and Management Plans (CAA/CAMP). The target could be for all relevant Conservation Areas to have up to date CAA/CAMPs, which are then used to inform the Local Plan.

The terminology used needs to be aligned with the NPPF. For example the term *historic assets* is used in the ‘targets’ section. This should be heritage assets which are clearly defined in the NPPF. *Appendix A - Analysis of Relevant Plans, Programmes and environmental Protection Objectives*

There are a number of additional documents that should be included when considering the historic environment. These are listed below:

- Planning (Listed Buildings and Conservation Areas) Act 1990
- The PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide – March 2010 (it should be noted that this is still valid and not replaced by the introduction of the NPPF and remains until a replacement is published).
- English Heritage’s Guidance on the *Environmental Assessment, Sustainability Appraisal and the Historic Environment* (2010) (<http://www.englishheritage.org.uk/publications/strategic-environ-assessment-sustainability-appraisalhistoric-environment/>). This document should be carefully reviewed as part of developing the SA for the Local Plan.
- A Research Framework for London Archaeology (2002) (<http://www.englishheritage.org.uk/professional/advice/our-planning-role/greater-london-archaeologyadvisory-service/about-glaas/research-frameworks/>)
- Relevant Conservation Area Appraisal and Management Plans; and where available Borough Heritage Strategies.

#### *Appendix B – Baseline Data B.10 Cultural Heritage*

Reflecting our comments above in response to the issues and opportunities, the range of heritage assets considered is limited. In addition to locally listed buildings not captured, the baseline data should also include details from the GLHER. This Record contains a wealth of information such as non-designated heritage assets. Overall it acts as an invaluable archaeological and historic resource both above and below ground. It is constantly being up dated as new investigations and discoveries are being identified, partly due to the recording and dissemination of field work. This information can be useful for both plan making and development management purposes.

In developing appraising the Local Plan through the SEA/SA process, we would strongly support the involvement of the Borough’s own conservation staff. They are often best placed to advise on local heritage matters. In the meantime we

## Comments received on the SA Scoping Report- January to March 2013.

	<p>welcome our continued involvement in the SDEA/SA and Local Plan, and look forward to working with the Corporation in address any concerns raised.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by you. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, where English Heritage consider it appropriate to do so.</p>
<b>Highways Agency</b>	<p>Thank you for your letter dated 4 February 2013 regarding the <b>London Legacy Development Corporation Local Plan - Draft Scoping Report: Strategic Environmental Assessment/Sustainability Appraisal and Habitat Regulations Assessment.</b></p> <p>The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport.</p> <p>The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.</p> <p>We have reviewed the consultations and do not have any comment at this time.</p>
<b>Natural England</b>	<p>Thank you for your consultation on the above dated 04 February 2013.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England has read the four documents that are part of this consultation, and we have responded below.</p> <p><b>a. Are there any key emerging plans, initiatives and environmental protection objections that you consider should be identified as part of the assessment?</b></p> <p>Natural England recommends the inclusion/amendment of the following:</p> <p><b><i>The Natural Environment and Rural Communities Act (2006)</i></b></p> <p><a href="http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx">http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</a> Section 41 of the NERC Act 2006, lists species and habitats of principal importance that local authorities must have</p>

## Comments received on the SA Scoping Report- January to March 2013.

regard for. Many of which are identified in the London and Olympic Park BAPs, and are relevant for the plan.

**Natural Environment White Paper (2011):** <http://www.defra.gov.uk/environment/natural/whitepaper/>

The NEWT has a close focus on promoting high quality natural environments, expanding multi-functional green infrastructure networks and initiating landscape-scale action to support ecological networks. The White Paper specifically seeks to: protect core areas of high nature conservation value; promote corridors and „stepping stones“ to enable species to move between key areas.

**Biodiversity Strategy for England (2011):** <http://www.defra.gov.uk/publications/2011/08/19/pb13583-biodiversity-strategy-2020/>

This seeks to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks with more and better places for nature for the benefit of wildlife and people. Strategy also proposes introduce a new designation for Local Green Areas to enable communities to protect places that are important to them.

**Making Space Nature (2010):** <http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf>

A report into the state of England’s wildlife sites, led by Professor John Lawton and published in September 2010, which showed that England’s wildlife sites are fragmented and vulnerable to change. The report makes the following key points for establishing a strong and connected natural environment: that we better protect and manage our designated wildlife sites; that we establish new Ecological Restoration Zones; and that we better protect our non-designated wildlife sites.

**Olympic Park Biodiversity Action Plan/ Revised Queen Elizabeth Olympic Park BAP (in progress).**

<http://www.london2012.com/mm/Document/Publications/Sustainability/01/24/08/11/olympic-park-biodiversity-action-plan.pdf>

The UK Biodiversity Action Plan (UK BAP) was published back in 1994, and was the UK Government’s response to the Convention on Biological Diversity (CBD), which the UK signed up to in 1992 in Rio de Janeiro. Action plans for the most threatened species and habitats were set out to aid recovery, and national reports, produced every three- to five-years, showed how the UK BAP was contributing to the UK’s progress towards the significant reduction of biodiversity loss called for by the CBD.

The Olympic Park Biodiversity Action Plan (now being revised as the QEOP BAP) was a planning requirement and established the biodiversity targets for the Olympic Park. This included the requirement to create 45 hectares of new habitat (which will eventually mature to meet a quality standard of SBI Grade 1 or better) to replace the loss of previously designated sites of natural conservation importance on the Park, as well as action plans for 28 species or

## Comments received on the SA Scoping Report- January to March 2013.

species groups, including plants, invertebrates, fish, amphibians, reptiles, birds and mammals.

**London's Natural Signature and Lea River Valley Natural Landscape Area:**  
[http://www.naturalengland.org.uk/Images/01-execsummary\\_tcm6-14408.pdf](http://www.naturalengland.org.uk/Images/01-execsummary_tcm6-14408.pdf)  
[http://www.naturalengland.org.uk/Images/11-lea\\_tcm6-14418.pdf](http://www.naturalengland.org.uk/Images/11-lea_tcm6-14418.pdf)

Since a lack of widespread awareness of the underlying nature of London has been a major cause of the gradual erosion of London's natural character – through for example the culverting and canalising of rivers and the felling of native woodlands – as well as of the neglect of those remnants of natural landscapes which appear to have no obvious amenity value, there is a clear demand for a succinct and evocative way of distilling and expressing this essence. The Natural Signatures are a means of encapsulating and evoking the key natural characteristics of the Natural Landscape Areas.

**London Plan - All London Green Grid Supplementary Planning Document and Area Framework for Lee Valley and Finchley Ridge:**  
<http://www.london.gov.uk/publication/all-london-green-grid-spg>  
<http://www.london.gov.uk/sites/default/files/AF01%20Lee%20Valley%20and%20Finchley%20Ridge.pdf>

The concept of a "green grid" – an integrated network of green and open spaces together with the Blue Ribbon Network of rivers and waterways – is at the centre of the London Plan's approach to the provision, enhancement and management of green infrastructure. This network of spaces functions best when designed and managed as an interdependent „grid". The ALGG SPG aims to promote the concept of green infrastructure, and increase its delivery by boroughs, developers, and communities, by describing and advocating an approach to the design and management of green and open spaces to deliver hitherto unrealised benefits. These benefits include sustainable travel, flood management, healthy living, and creating distinctive destinations; and the economic and social uplift these support.

**Olympic Park Green Infrastructure Strategy/Revised Queen Elizabeth Olympic Park Green Infrastructure Strategy (in progress)**

This strategy provides justification for the provision of all green spaces in the area of the Planning Application including open space, biodiversity areas and playspace.

**A Strategic Plan for the Waterways (in progress)**

Currently being developed by the London Legacy Development Corporation and Canal & River Trust, which will cover the rivers and canal networks within the London Legacy area. The Strategic Plan looks at 9 separate character areas and identifies potential use by types of activity and audience. Each of the Character Areas has been approached with the following aims: context of the Lower Lea Valley; create a strong sense of place and focus for the waterways; fully explore the added value of the waterspace; flood storage/attenuation and wildlife value; broad boating use; sports and recreation; integrate the use and appearance of the different areas of waterspace.

## Comments received on the SA Scoping Report- January to March 2013.

### **b. Can you recommend any important information sources to supplement the baseline data we have collated?**

1. The Local Wildlife Sites within the London Legacy area should be specifically mentioned:

- Bow Back Rivers
- Eastway Cycle Track and Bully Point Nature Reserve
- Lea Valley
- London's Canals
- River Thames and Tidal Tributaries
- The Greenway and Old Ford Nature Reserve

There is baseline biodiversity data available for the Olympic Park site. This data should be analysed and detailed as part of the baseline evidence for *Biodiversity, Flora and Fauna*. Greenspace Information for Greater London (GIGL) will also have relevant baseline data for the London Legacy area.

3. “*West Ham and East Ham*” in Newham (within LL boundary) are identified as deficient in access to nature under the GLA’s Area of Deficiency dataset.

### **c. Do you agree with the sustainability issues we have identified? Are there additional issues that both the assessment and the Local Plan should consider?**

In order to comply with the planning requirement to deliver the Olympic Park BAP targets, the SA should clearly identify the adopted BAP and GI objectives that need to be delivered. We understand that the QEOP BAP and GI Strategy are currently under review, and as part of this review it is important that the wider boundary of the London Legacy area is not forgotten. The QEOP BAP and GI Strategy has the potential to not only deliver targets within the QEOP area, but also guide biodiversity delivery, especially the *Built Environment* part of the BAP, for the rest of the LL area. Natural England is satisfied with the conclusions reached so far on the LLDC Local Plan Habitats Regulations Assessment, dated December 2012.

### **e. Are there any changes you consider should be made to the proposed assessment objectives and indicators?**

1. Natural England now promotes the use of ANGSt standards rather than Box and Harrison Nature Conservation Area standard. Natural England’s „standards for accessible natural greenspace“ (ANGSt) provides a basis to ensure new and existing housing has appropriate access to nature. More information can be found on Natural England’s publication, „*Nature Nearby, Accessible Greenspace Guidance*“ (March 2010), available on our website, publication reference NE265.

**Comments received on the SA Scoping Report- January to March 2013.**

	<p>2. Biodiversity Action Plan Priority Habitats and Species indicators and targets should reflect the targets set out in the relevant BAPs, Natural England recommends the use of the following targets and indicators 1) the achievement of BAP targets and 2) the area and condition of BAP Habitats/Species.</p> <p>3. An indicator and target should be set to ensure the favourable condition and management of Local Wildlife Sites, a useful indicator and target is: the area and number of LWS in favourable condition</p> <p>4. Green infrastructure in the built environment clearly supports the objectives under the Olympic Park BAP (now being revised), and the London Legacy sustainability agenda. Natural England recommends using targets and indicators such as number of planning applications which deliver green roofs, green walls, Sustainable Urban Drainage Systems and rainwater gardens.</p> <p><b>f. Do you have any comments regarding the approach to assessing the strategic alternatives?</b> Natural England has no comments to make regarding this question.</p> <p><b>g. Do you have any further suggestions regarding the scope of the SA and the proposed approach to appraise the Local Plan?</b></p> <p>Natural England has no comments to make regarding this question. We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.</p>
<p><b>Transport London</b></p>	<p><b>for</b></p> <p>Thank you for the opportunity to comment on the Local Plan scoping report and appendices. TfL will be pleased to offer any further assistance in providing information or analysis to support the progress of the LLDC Local Plan.</p> <p>The following comments make a few minor observations on the submitted scoping reports and pointers to further published documents which may be of relevance, and therefore together relate to questions A, B, C and E.</p> <p><b>SEA / SA Scoping Report</b></p> <p>5.3.5, 5.3.12 and 5.3.13 These sections make no reference to the potential for use of water for leisure, freight, waste or construction. Improvements have been made at Three Mills Lock to enable larger barges to enter the area's waterways network, and were actively used for the construction of the Olympic Park.</p> <p>5.3.13 Transportation:</p>

## Comments received on the SA Scoping Report- January to March 2013.

Bullet 1: Comment - “The LLDC area appears to be well connected strategically by transport infrastructure and public transport links, making the area relatively accessible.” The strategic infrastructure is established, or has been enhanced to support the Olympic Games, with the minor exception of routes north of Stratford towards Waltham Forest. As point 6 notes the local links are often poor – sometimes a result of the barriers of transport infrastructure such as roads and railways.

Bullet 2: Comment - “Stratford regional and international, Pudding Mill Lane DLR, Hackney Wick London Overground stations are located within the LLDC area.

### 6. SA Objectives and Sub-Objectives

#### 5 Sustainable Access

Targets: This could include some reference to modal shift measures, for example to increase walking and cycling, or decrease use of private vehicles, in line with such initiatives as included in the submitted LCS site-wide travel plan.

### Appendix A

#### P37 Mayor’s Transport Strategy:

As well as the headline goals, note that MTS section 5.11 and proposal 47 relate to the 2012 Games Legacy. Further to this, “Leaving a Transport Legacy” was produced in March 2012 – see p 71 for Monitoring.

<http://www.london.gov.uk/priorities/london-2012/better-transport-networks/creating-transport-legacy>

TfL will be continuing to undertake monitoring of the transport legacy of the 2012 London Games – which will partly relate to London-wide measures and opportunities to change travel behaviour, while there may be some local information and analysis that will be of use to LLDC, and TfL will be pleased to share this with you.

TfL’s recent Travel in London reports are linked below.

See Section 5.9 of TIL 4 (2011) for an overview of 2012 Games monitoring.

<http://www.tfl.gov.uk/assets/downloads/corporate/travel-in-london-report-4.pdf>

TIL 5 (2012), with a spotlight on the 2012 Games.

<http://www.tfl.gov.uk/assets/downloads/corporate/travel-in-london-report-5.pdf>

### Appendix B

**Comments received on the SA Scoping Report- January to March 2013.**

	B13- The 2011 census information is being released.
--	---