

Date: 17<sup>th</sup> July 2009  
Our ref: BO5/2-10/12



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Dear Helen,

**RE: LDF Core Strategy Submission Draft London Borough of Hackney**

Thank you for consulting Natural England on the proposed submission of the Hackney Core Strategy.

Firstly, as you are aware I provided comments on the previous drafts on 19th March and 26<sup>th</sup> May 2009. The Core Strategy appears to be improved on the previous drafts, although some comments do not appear to be fully reflected in the proposed submission.

Therefore in relation to the proposed Core Strategy submission Natural England has the following comments to make:

Strategic objectives

Tackling climate change – although Natural England supports the inclusion of an objective relating to climate change, this objective focuses on mitigation. We would encourage the Council to place more explicit emphasis on climate change adaptation which is also important.

***Chapter 8: Cleaner, Greener and Safer Places***

Open Space Network Policy 26/Appendix 2

Natural England's London region is currently developing green infrastructure principles in order to help Councils, developers and others to understand the multifunctional nature of GI and to aid planners in designing GI to maximise its benefits. These principles are:

**Natural Signature:** The greenspace network designed and managed to reflect or echo the extant or former natural landscape: providing a stronger sense of place, enhanced biodiversity and more robust ecological connections.

**Natural Resilience:** Promoting urban greening and making space for water: providing flood management and urban cooling through natural environment interventions for climate change adaptation.

**Natural Health Service:** People easily routed into local natural greenspace from their homes and work places: providing opportunities for physical activity, relaxation and healthy living.

**Natural Play:** Spaces which are wildlife-rich and occasionally 'wild' in nature: providing scope for the imaginative play that is essential for healthy child development.

**Natural Connections:** People engaged in outdoor recreation and education, and volunteering for the natural environment: providing a reason to care about local environmental quality and their planet's future.

We would encourage the Council to consider whether these principles are reflected within the Core Strategy, including within Appendix 2, and within future LDDs. We would also strongly encourage the Council to reflect these principles when planning and designing green infrastructure in the Borough and considering planning applications/ Masterplans etc.

Additionally, although Appendix 2 is useful in demonstrating how open spaces can deliver multifunctional benefits, we recommend that the Council goes further by explicitly stating in the main body of the Core Strategy (preferably within the Open Space Policy) that new and existing open spaces and other environmental features should be designed to be multifunctional and provide multiple benefits and services and should not be seen as a number of mono-functional spaces which are linked together, as this does not represent fully functional green infrastructure.

Map 8.1 – it is not clear whether this map includes the GLAs Areas of Deficiency in Access to Nature. We recommend that these are included on this map or an additional map.

#### Core Strategy Policy 27; Biodiversity

We welcome the reference to encouraging development to include measures that contribute to the borough's biodiversity. However, we are of the opinion that this wording should be strengthened. For example, the policy could state that all development will be expected to demonstrate how it will contribute to the natural environment, including biodiversity (or similar). Additionally, reference to Biodiversity by Design etc is welcomed. However it may also be beneficial to include a paragraph on the type of contributions to the natural environment that developments could make in addition to signposts to other documents in order to help developers to comply with this policy.

In addition to the documents outlined in our previous letter, the Council may also wish to reference the following in order to help developers to comply with this policy:

- Biodiversity and the Built Environment, UK Green Building Council, 2009
- Improving Londoners' Access to Nature: London Plan (Consolidated with Alterations since 2004) Implementation Report, Mayor of London, 2008
- Parks, People and Nature: A guide to enhancing natural habitats in London's parks and green spaces in a changing climate, Mayor of London/Natural England, 2008

#### ***Climate change and environmental sustainability***

We welcome the inclusion of Paragraph 9.12, although we suggest that the first line is amended to 'opportunities to enhance existing and create new green infrastructure....'

#### Overarching principles

We welcome the inclusion of an overarching principle 'encourage development of new green infrastructure'. This states that new green public and private green spaces lower energy demand and therefore help to reduce CO<sub>2</sub> emissions.

Although green infrastructure can help to reduce energy demand, it also plays a vital role in helping to adapt to the impacts of climate change such as flood storage, providing shading and reducing the urban heat island effect (as recognised in paragraph 9.12). This should be made explicit in the principle.

Additionally, infrastructure is wider than green spaces, private gardens and natural landscape features and also includes other environmental features such as SUDS, green roofs and walls

etc. Green infrastructure should be designed and managed as a multifunctional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and needed to underpin sustainability. This should also be made explicit in the overarching principle.

### **Sustainability Appraisal Report**

The comments above are in addition to the recommendations set out in the SA report which we generally concur with. We recommend that the points above are addressed along with the recommendations set out in the SA report.

### **Habitats Regulations Assessment**

We have no further comments to make with regards the Habitats Regulations Assessment.

I hope you find our comments useful. If you have any further questions about this letter or require further information please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in blue ink that reads "LWalduck".

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