Dear Mrs Yvonne Wright,

I have signed a statement of common ground with the Council that shows agreement on parts of the draft Local Plan in Chapter 11. However, there are other elements that have not been addressed and unfortunately, we did not reach agreement on.

These other elements are in my original submission and in further written statements attached.

I am representing a number of local and community groups who are concerned about the loss of biodiversity in Hackney as well as further afield:

- Hackney Green Party contact Meryn Cutler meryn.cutler@gmail.com
- Tree Musketeers contact Russell Miller rm@km551818.demon.co.uk
- Millfields User Group Harry Hewat harry@harryhe.co.uk
- East West Bank Nature Reserve nino.hunter@gmail.com / Parimal.p.Makwana@gmail.com
- Stoke Newington Common User Group contact Liz Collings liz@rcollings.co.uk
- London Fields User Group contact Dean Wei deancwei@gmail.com
- Wildlife Gardeners Of Haggerston contact Gideon Corby Wildlifegardenersofhaggerston@gmail.com

Best wishes,
Gideon Corby
10. LP46 Protection and enhancement of green infrastructure – Is the policy sound? In particular:

a. Is it appropriate for all new development to enhance the network of green infrastructure and watercourses across the borough etc as set out in part A of the policy?
   • Yes, it is appropriate. We are entering what a consensus of scientists have termed ‘The Sixth Mass Extinction’ as momentous a process as the Climate Crisis. [https://www.pnas.org/content/114/30/E6089.short](https://www.pnas.org/content/114/30/E6089.short)
   • Small developments with appropriate habitat can act as stepping stones to create green corridors.
   • Small developments that consider appropriate lighting can enhance green corridors or neighbouring habitat.
   • Small developments can provide roosting / nesting facilities with one or two bricks or boxes.
   • Just as gardens individually do not amount to much, when combined across a landscape, small developments can have a major impact.
   • It is easier for developers to know that they must always consider green infrastructure even just specifying bat/moth friendly external lighting, for example, rather than having to work out whether a particular development need to consider.

   e. How have ‘other open space’ been defined and is this justified?
   • Hackney’s definition of open space does not include private gardens or biodiversity.
     o Private gardens should be protected. ‘Gardens, including front gardens, are at particular risk in the borough and have been under increasing pressure from development over recent years. While development in one garden may have only a small impact, the cumulative effects of reduced garden space (at a local and regional level) is significant, for example by collectively reducing the amount of permeable surfaces to deal with increasing risks of surface water flooding, by reducing biodiversity and ecological connectivity, and by impacting on the overall open and green character of the borough.’ (Islington draft LP).
     o London Plan 2016: Policy 3.5: ‘Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.’
   • Hackney supports sport and recreation but not biodiversity in glossary definition of open space.
     o Biodiversity should be included in definition. Please include, ‘opportunities to protect and develop biodiversity within the area, in particular along the River Lee and Regent’s Canal’.
g. Is it reasonable to require living roofs on major development schemes that include roof plates over 100sqm?

- Sustainable drainage is encouraged in London Plan. Living roofs especially using a combination of blue/green features are cheaper than conventional underground SuDs to build and maintain even when including the need to support the extra weight of the roofs.
- The new development at Marion Place, Homerton currently going through planning, is an example of the multiple benefits, including lower cost to the developer, of blue green roofs.

h. The Council has suggested an addition to Part E relating to the quality of living roofs. Is this justified and necessary for soundness? Is it appropriate for the roofs to be in accordance with a specification that is not within a development plan document?

- If a living roof is of poor quality it fails to serve its function. The quality of material and depth must be made clear early on to ensure the building structure can bear the weight of the living roof.
- The specification of living roofs will be within the BAP and biodiversity advice notes which we hope will be a Supplementary Planning Document.
11. LP47 Biodiversity and sites of importance of nature conservation – is the policy sound? In particular:

d. Is the requirement for all new major development to include a biodiversity survey of the site justified?
   - Yes, biodiversity surveys are necessary to establish what is currently on site and in the vicinity of a site.
   - Without a survey Net Gain cannot be calculated.
   - A survey can prevent protected species such as bats from being harmed during development.
   - A survey can help with mitigation and/or enhancement conditions.

e. Are the Council’s suggested changes for part D and the supporting text relating to eaves height justified and necessary for soundness?
   - An eaves height of 5m would increase the number of available developments where this condition could be imposed. This can be a cheap enhancement for small developments.
   - Birds and bats may roost below 5m however there is an increased chance of predation by domestic cats and other interference.

f. Are any other suggested changes necessary for soundness?
   - Mention of the BAP and biodiversity advice notes would help planning officers and developers find what, when and how to fulfil policy.
   - ‘Green infrastructure enhancements will be considered at an early stage in the design process. Sites with a low existing green infrastructure value represent particular opportunities to increase green infrastructure functions and will be pursued in the planning process.’ (Islington draft LP).

13. LP49 Green chains and green corridors – Is the policy sound? Is it necessary to include reference to watercourses, natural buffer zones and specific lighting within this policy?

   - Refer to watercourses in LP52
   - Refer to lighting in LP52 or here or in LP46. Include a reference to BAP for details of lighting (and noise and shadowing).

14. LP51 Tree management and landscaping – Is the policy justified, effective and consistent with the London Plan and national policy? How are ‘landscape features’ and ‘trees of amenity value’ etc proposed to be assessed and is this clear within the Plan? Are ‘landscape features’ defined in the Plan?

   - Refer to BAP for details as policy on trees will surely be tightening in near future.
15. LP52 Waterways, canals and residential moorings - Are any suggested changes necessary for soundness?

- Ponds should be included along with ‘Waterways, Canals, Residential Moorings’ (Draft London Plan, Policy SI17 B, D Protecting and enhancing London’s waterways).
- The natural habitat and setting of the waterways and their riparian areas must be protected and enhanced. The Lea and Regent’s Canal are being transformed into blue / green wildlife corridors under the guidance of the Canal and River Trust. This project will increase both the populations and species of wildlife within Hackney. The habitat value of waterways is a key element of their future management. Draft London Plan 8.6.2.
- The Lea and Regent’s Canal allow residents a route to reach Islington and Stratford on foot and away from roads. It is possible to walk to Woodberry Wetlands and Walthamstow Wetlands over Hackney Marshes via the canal and river. These are community assets that are only now receiving the attention they deserve. Open spaces, particularly those planned, designed and managed as green infrastructure – provide a wide range of social, health and environmental benefits, and are a vital component of London’s infrastructure. Connectivity across the network of open spaces is particularly important as this provides opportunities for walking and cycling. Green spaces are especially important for improving wildlife corridors. (Draft London Plan 8.4.1)
- The Draft London Plan recognises ‘the cross-borough nature of some forms of green infrastructure’ and ‘proposals to enhance open spaces to provide a wider range of benefits for Londoners will be encouraged’. (Draft London Plan 8.4.1) To realise these aims, the Council will support habitat creation and landscaping improvement along the Lea and Regent’s Canal.
- Development Alongside Waterways and Canals: ‘Development proposals should consider the potential impact of indirect effects to the site, such as noise, shading or lighting. Draft London Plan 8.6.3.
- Residential Moorings: Proposals for residential moorings and associated facilities must not:
  - ‘Use The Lea and Regent’s Canal as an extension of developable land in London, nor should parts be a continuous line of moored craft.’ 9.17.2 Draft London Plan
  - ‘Pollution from vessels should be minimised in terms of emissions from vessels and related land-side infrastructure. This includes the requirement in this policy to consider providing on-shore power at wharves and moorings along The Lea and Regent’s Canal and its basins.’ 9.17.3 Draft London Plan